



Committee: PLANNING POLICY CABINET ADVISORY GROUP

Date: TUESDAY, 17 FEBRUARY 2026

Venue: HYBRID: LTH OR VIA TEAMS

Time: 2.30 P.M.

A G E N D A

1. **Apologies**

2. **Minutes**

To receive as a correct record the minutes of the meeting held on 13th January 2026 (previously circulated).

3. **Items of Urgent Business**

To consider any such items authorised by the Chair and to consider where in the agenda the item(s) are to be considered.

4. **Declarations of Interest**

To receive declarations by Councillors of interests in respect of items on this Agenda.

Councillors are reminded that, in accordance with the Localism Act 2011, they are required to declare any disclosable pecuniary interests which have not already been declared in the Council's Register of Interests. (It is a criminal offence not to declare a disclosable pecuniary interest either in the Register or at the meeting).

Whilst not a legal requirement, in accordance with Council Procedure Rule 9 and in the interests of clarity and transparency, Councillors should declare any disclosable pecuniary interests which they have already declared in the Register, at this point in the meeting.

In accordance with Part B Section 2 of the Code Of Conduct, Councillors are required to declare the existence and nature of any other interests as defined in paragraphs 8(1) or 9(2) of the Code of Conduct.

5. **Consultation Response to the Draft National Planning Policy Framework Consultation** (Pages 3 - 82)

- **Appendix A:** Questions on proposed reforms to the National Planning Policy Framework and other changes to the planning system

6. **Authority Monitoring Report (AMR) Update** (Pages 83 - 87)

7. **Public Consultation on the Draft Forest of Bowland National Landscape Management Plan 2026-2031** (Pages 88 - 99)
- **Appendix 1:** Lancaster City Council's response to the Forest of Bowland National Landscape Draft Management Plan consultation
8. **Date of the next meeting**
- Tuesday 24th March 2026, 13:30 – 16:00 at Morecambe Town Hall or via Teams.

ADMINISTRATIVE ARRANGEMENTS

(i) Membership

Councillors Sue Tyldesley (Chair), Louise Belcher, Dave Brookes, Keith Budden, Andrew Otway, Jean Parr, Joyce Pritchard, Sandra Thornberry and Paul Tynan

(ii) Substitutes

Councillors Claire Cozler and Paul Newton

(iii) Queries regarding this Agenda

Please contact Eric Marsden, Democratic Support - tel: 01524 582000, or email: emarsden@lancaster.gov.uk.

(iv) Changes to Membership, substitutions or apologies

Please contact Democratic Support email democraticsupport@lancaster.gov.uk.

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Planning Policy Cabinet Advisory Group – 17 February 2026

Item 1: Consultation Response to the Draft National Planning Policy Framework Consultation

1.0 Introduction

- 1.1 On 16 December 2025, the Government’s Ministry of Housing, Communities and Local Government (MHCLG) published a consultation on a revised version of the National Planning Policy Framework (NPPF). A new, draft NPPF was published alongside the consultation questions. The consultation is substantial in terms of detail and length, comprising 225 questions.
- 1.2 The consultation will close on 10 March 2026. In order for the City Council to respond appropriately, the Planning Policy Cabinet Advisory Group (PPCAG) will consider the suggested responses that are appended to this report. Members of the Planning Regulatory Committee have been invited to the meeting to participate.
- 1.3 Section 2 of this report sets out the key issues arising from the draft NPPF, and Section 3 discusses the potential main considerations for the Lancaster District.

2.0 Key Issues Arising from the Draft NPPF

- 2.1 The MHCLG set out in the consultation that the Government’s aim to reform the planning system requires a “*fuller and more definitive update of national planning policy*”. This means that the draft revised version of the NPPF is much more than a series of amendments; it is a radical restructuring to create a more “*rules-based*” approach to planning policy interpretation, local plan preparation and planning application decision-making.

Overview

- 2.2 The proposed revisions aim to achieve three principal objectives, which are:
 - To ensure national planning policy is accessible and understandable for everyone who uses it;
 - To establish a comprehensive suite of national policies on general planning matters which will apply across the country, to avoid these matters being repeated or deviated from in locally-produced plans – in so doing helping to speed up their preparation and preventing an unnecessary increase of different standards that can complicate development; and,
 - To make the policy which it contains more ‘rules-based’ and certain, and so more capable of supporting timely and consistent planning – especially in those

places where development is most desirable, where national policy should provide for a default “yes” to the principle of development.

- 2.3 One of the much-anticipated changes was to be the inclusion of a series of statutory national decision-making policies within the NPPF. This would have avoided the need for the inclusion of generic decision-making policies within Local Plans. However, Government announced late last year that the national policies within the draft NPPF would be non-statutory (although this decision will be kept “*under review*”). Even though the national policies are non-statutory, they are worded to set expectations for all development proposals. The consultation makes it explicit that the decision-making policies “*should not be repeated in development plans*”.
- 2.4 The Draft NPPF appears to achieve its aim in being more accessible. The decision to remove continuous paragraph numbering and replace it with topic-based numbered policies should make the NPPF more usable and simpler to reference. Separating ‘plan-making’ and ‘decision-making’ content is equally as effective.
- 2.5 A continuing theme throughout is the delivery of much-needed housing and commercial development. The Government seeks various policy levers to make this happen, including a permanent presumption in favour of “*suitably located development*”; a default ‘Yes’ to develop proposals around well-served railway stations; greater focus on urban and suburban densification to make the most out of land; stronger support for rural social and affordable housing; and supporting “*small and medium*” housing sites.

The Plan-Making Framework

- 2.6 The draft pre-empts the reintroduction of the tier of regional planning. New Spatial Development Strategies (SDS) will be produced by strategic planning authorities (i.e. combined authorities, etc), and they will set a positive vision for future growth for at least 20 years at a sub-regional scale. These SDSs will be expected to be “*genuinely strategic in nature*” and will not repeat the district-wide content of Local Plans.
- 2.7 The changes to the local plan system have been well-trialed in advance of the draft NPPF. There is an expectation that local plans should be prepared and adopted within 30 months of publishing a Gateway 1 assessment, and that plans should cover a period of not less than 15 years from the adoption date (although the consultation also seeks views on an alternative period of 10 years). Preparation of any subsequent local plan should commence within 5 years following adoption.
- 2.8 Another plan-making change is the introduction of Supplementary Plans. These allow local planning authorities to “*set design expectations or allocate specific sites for development outside the local plan cycle, while remaining part of the development plan*”.
- 2.9 A key policy within the NPPF is Draft Policy PM6, which sets the general principles for plan-making. The policy states that local plans should “*not replicate, substantively*

restate or modify (the) national decision making policies unless directed by other policies in the draft Framework”.

- 2.10 Policy PM8 favours the reuse or updating of an existing local plan evidence base, as opposed to the commissioning of wholly new evidence “*where possible*”. The purpose of policy is to ensure that the evidence base is “*relevant, proportionate and sufficiently up to date*”.
- 2.11 There are stronger expectations that the local planning authority shall engage proactively and regularly to identify and address cross-boundary matters. This includes scenarios where the district’s development needs cannot be wholly met within the plan area. This replaces the previous ‘duty to co-operate’. Demonstration of “*effective cooperation*” is anticipated via statements of common ground between the authorities.
- 2.12 The NPPF also requires authorities to “*promote greater clarity*” at the plan-making stage regarding developer contributions. Local plans are expected to include the levels of expected affordable housing contributions (expressed as a single figure, and not as a range); be realistic about the level of contribution, thus reducing the need for viability assessments at the decision-making stage; and be clear so that developers can account for the contribution when agreeing the price paid for land. Local plans should also agree the circumstances for contribution review for those developments that cannot achieve the requirements within the local plan.
- 2.13 Policy PM13 stipulates that quantitative standards set through local plan policies should be limited to “*infrastructure provision, affordable housing requirements, parking, and design & placemaking*”. Standards should not seek to cover matters that are already addressed by the Building Regulations (other than accessibility standards or water efficiency). This policy limits the ability to set local standards for energy efficiency.
- 2.14 Finally in the plan-making section, there are a series of draft policies regarding the examination of plans. The revised tests for plan ‘soundness’ include an expectation that SDSs should meet housing need except in exceptional circumstances; and that local plans should positively plan for growth and change, and should be positive, appropriate, realistic, consistent and in conformity with any adopted SDS for the area. The key change in this policy is that existing requirement for plans to be “*justified*” has been replaced with the wording “*appropriate*”, and “*effective*” has been replaced with “*realistic*”. This aims to encourage local planning authorities to take a more proportionate approach to plan-making.

Decision-Making Policies

- 2.15 The stronger focus on proportionality continues in the decision-making paragraphs. There is an expectation (Policy DM1) that proposals for major development should be informed by early pre-engagement with the local community and that planning applications should be accompanied by a “*concise planning statement*” demonstrating consistency with the development plan. This should explain how the

proposals have evolved following pre-application and must set out the proposed use of planning obligations. The consultation also discusses different approaches to information (validation) requirements (Policy DM2).

- 2.16 Policy DM5 expands on the plan-making policies regarding developer contributions, by setting out the circumstances where a viability assessment may be justified. These considerations will inform a local planning authority's assessment of the weight to be given to the viability case.
- 2.17 The NPPF strengthens the enforcement approach that should be taken if unauthorised development is deemed to be "*intentional*". In those circumstances the intent to subvert the planning process should be given "*substantial weight*" when determining a planning application.
- 2.18 Policy DM10 provides more flexibility for removing permitted development rights, where it is necessary to protect the amenity of wellbeing of an area.

Achieving Sustainable Development

- 2.19 This chapter considers sustainable patterns of development and has a greater pro-growth narrative than previous versions of the NPPF. Of particular interest are the revised approaches to the presumption in favour of sustainable development (Policy S3); the principle of development within settlements (Policy S4); and the principle of development outside settlements (Policy S5).
- 2.20 Policy S3 replaces the tilted balance contained in the existing NPPF with more guided locational development advice in S4 and S5. S4 is clear; development proposals within settlements should be approved "*unless the benefits of doing so would be substantially outweighed by any adverse effects*". The policy then provides examples where development might have an unacceptable impact.
- 2.21 Policy S5 takes a new approach to development outside settlements (other than in the Green Belt or on locally designated Open Space, in which case this policy does not apply), but it is still restrictive in terms of the type of development that is suitable. Appropriate types of development would include development for agriculture, outdoor sport and recreation, allotments, burial grounds, mineral and engineering operations and national infrastructure. Additions to the list include development for rural business, where a proposal outside a settlement boundary is considered necessary. There is also a provision that development for housing and mixed-use development within reasonable walking distance of a railway station may be appropriate, and development which would address an evidenced unmet need (such as housing that would help meet a five year supply of deliverable housing sites). This is to assist with the delivery of development in more sustainable locations. However, isolated homes are still not encouraged other than in exceptional cases (set out later in the consultation, at Policy HO11).

Meeting the Challenge of Climate Change

- 2.22 The NPPF describes the positive approach that should be taken towards mitigating and adapting to climate change during plan-making. Development patterns that can radically reduce greenhouse gas emissions are encouraged, as are allocations that avoid increased climate vulnerabilities. Encouragement is provided for the pursuit of opportunities for green infrastructure provision and the delivery of nature-based solutions that can improve carbon storage and support nature recovery.
- 2.23 A set of locational and technical criteria (Policies CC2 and CC3) is provided to guide decision-making and assist with the transition to net zero.

Delivering a Sufficient Supply of Homes

- 2.24 The NPPF is unequivocal in terms of the process that must be followed for assessing the need for homes, the provision of sufficient land and the establishment of a housing requirement figure. Of particular relevance is:
- Policy HO1, which states that SDSs (or a local plan where an SDS is not in place) should be based upon a Housing Needs Assessment; an assessment of permanent and transit site accommodation for travellers; and an understanding of accommodation needs that cannot be met in neighbouring areas;
 - Policy HO2, which says that the SDS should establish a housing requirement and that these figures “*should not* (unless there is a change of circumstances since the figure was produced) *be re-tested as part of local plan preparation*”. The policy continues by saying that Neighbourhood Plans should also have a housing requirement figure, except in circumstances where there is a clear and well-evidenced need for no housing, or the constraints are so substantial to preclude any housing coming forward; and,
 - Policy HO3, which requires local plans to identify a sufficient supply and mix of sites to “*meet or exceed*” their housing requirement figure. Specific deliverable sites should be identified for five years, and a further supply of deliverable sites or broad locations for growth for years 6-10 and, where possible, 11-15.
- 2.25 The identification of sites should include opportunities for large-scale development and mixed use development, and should meet the need of different groups, as well as planning for a diverse mix (scale and siting) of sites.
- 2.26 When making decisions on housing applications, the draft NPPF describes the weight that should be attributed to the benefits of providing housing that would meet the district’s needs as “*substantial*” (Policy HO7). The approach to affordable housing delivery (HO8) contains changes for proposals that meet or exceed the requirements for affordable housing, by permitting more flexibility regarding the size of market homes. The inclusion of military affordable housing is also new. Views are sought on

whether a minimum proportion of social rent housing should be required for major development.

- 2.27 The consultation notes a strong preference for on-site delivery of social and affordable housing; but also recognises the challenges this provides for small and medium (SME) housebuilders. So the consultation explores an alternative approach which could be inserted into Policy HO8 which provides additional flexibility for SME developers by allowing discretion to provide affordable and social housing either on site or via a cash payment for off-site provision.
- 2.28 Criteria-based policies are aimed at supporting delivery of specialist forms of accommodation (Policy HO9), including housing for older people; community-based accommodation; and purpose-built student accommodation. The rural exception site policy is also made clearer in Policy HO10 via the use of more explicit criteria, whilst a similar, more defined approach to traveller sites (Policy HO12) is also proposed.
- 2.29 The circumstances where isolated homes in the countryside are considered acceptable is set out at HO11 and now includes reference to homes that secure the long term reuse of a “*vacant or underused*” listed building.

Building a Strong, Effective Economy

- 2.30 The most significant changes in these paragraphs include a direction that plans should avoid overly prescriptive requirements on otherwise acceptable business and employment sites (Policy E1) and seek to address potential barriers to investment. There is greater encouragement for a more pragmatic approach to the specific locational requirements of different sectors.
- 2.31 The NPPF takes a more flexible approach to rural business development (Policy E4), explaining that some proposals might be located outside settlements and away from public transport to meet rural business needs.

Ensuring the Vitality of Town Centres

- 2.32 The increased pragmatism that is evident elsewhere in the draft NPPF is applicable in the paragraphs regarding town centres, where there is greater emphasis on diversifying town centre uses. Policy TC1 supports the use of town centre strategies to inform development plan preparation.
- 2.33 Policy TC3 is important in terms of considering the suitability of main town centre uses located outside town centres. The sequential test (i.e. town centres first) is retained; followed by edge of centre locations and, only if suitable sites are unavailable, out of centre locations.

Supporting High Quality Communications

- 2.34 There is comparatively little change to the narrative regarding telecommunications development, with a focus on utilising existing infrastructure and minimising the visual effect of masts and other structures, as well as retention of the self-determination

statement ensuring that infrastructure does not exceed International Commission guidelines.

Securing Clean Energy and Water

- 2.35 Policies in this chapter of the draft include encouragement to set requirements for early engagement with utility providers for energy and water infrastructure during the plan making stage (Policy W1). The NPPF also requires local planning authorities to identify areas that are suitable for renewable and low-carbon energy development, and, for the first time, adds ‘*electricity network infrastructure*’ to the wording of the policy (Policy W2). Policy W3 goes beyond existing national policy in attributing “*substantial*” weight should be given to the benefits of energy security, economic development and net zero.

Facilitating the Sustainable Use of Minerals

- 2.36 The consultation acknowledges two key national policy changes. The first is a more restrictive approach to the extraction of coal, oil and gas. This change in policy direction mirrors the announcements by Government in 2024 and 2025 regarding the cessation of new oil and gas licences. Additionally proposals for the extraction of peat at new or extended sites “*should be refused*”. The second change involves updating planning policy to reflect the Government’s recent *Vision 2035: Critical Minerals Strategy*. Critical minerals extraction/processing which supports the growth of the green energy transition and the delivery of net zero (as well as national security and the growth of key sectors set out in the Government’s Industrial Strategy) is given particular importance.
- 2.37 The sterilisation of mineral resources (by allowing non-minerals development in minerals safeguarded areas) is considered at Policy M2. It states that prior extraction should be required “*where practical and environmentally feasible*”.

Making Effective Use of Land

- 2.38 There is an increasing emphasis on developing land at higher densities, both in terms of meeting the need for housing and for non-residential development. Higher density locations can “*create sustainable and well-designed places*”. Policy L1 provides guidance and some suggested tools (such as design guides and design codes) to facilitate the use of brownfield land for development. The use of minimum residential density standards is advocated.
- 2.39 Policy L2 provides examples where the benefits of a development proposals should be given “*substantial weight*”. These include remediating derelict or degraded land; making better use of vacant and under-utilised sites; bringing forward temporary uses of land prior to full redevelopment; and building above existing premises.
- 2.40 The character of an area should be taken into account when achieving “*appropriate*” densities but should “*not preclude development proposals that maximise site potential*” (Policy L3). This policy also introduces density requirements for development near train stations. Lastly in this chapter, Policy R4 provides basic

advice regarding residential extensions. This is intended to complement local design guidance.

Protecting Green Belt Land

- 2.41 The well publicised changes to national Green Belt policy, including the introduction of the Grey Belt, were introduced in December 2024. The further changes in the current consultation aim to provide further clarity. Much of the emphasis of these paragraphs concerns facilitating development around suitable train stations, advising that Green Belt boundaries “*may be altered in order to support (well connected) development opportunities*” on land around such stations.
- 2.42 Policy GB2 establishes how Green Belts should be reviewed and assessed and sets out the roles of SDSs (to include an assessment of the strategic role of the Green Belt) and local plans (to identify any Grey Belt and Green Belt boundary alterations). Policy GB3 explains the process of reviewing the latter, whilst GB4 sets parameters for “*defining*” Green Belt boundaries in the event of proposed alterations or newly designated Green Belts.
- 2.43 The draft decision-making policies affecting Green Belt areas is clarified. Policy GB6 and GB7 are to be read together, with the latter listing development “*which is not inappropriate in the Green Belt*”. The list is considerable, and the key changes are:
- Reference to “*development*” for agricultural uses as opposed to the previous reference to “*buildings*”;
 - Clarity regarding the principle of the reuse, alteration, extension or replacement of buildings;
 - Replacement of the term “*preserves openness*” with wording to the effect that “*certain other forms of development (would not be inappropriate) provided the impact on the openness of the Green Belt is minimised and there would not be significant conflict with the Green Belt purposes*” (the policy then continues by listing examples of types of development);
 - Refers to “*development*” instead of the previous reference to “*housing, commercial or other...*” when describing how development that would utilise grey belt land and would not fundamentally undermine the purposes of the remaining Green Belt would not be inappropriate; and,
 - Introduces a significant new provision indicating that housing and mixed use development on Green Belt land is not inappropriate where it is near a well-connected (train) station.
- 2.44 The December 2024 changes to Green Belt policy introduced so-called ‘Golden Rules’ that are applicable to development on land within (or released from) the Green Belt. These rules aimed to ensure a higher level of social and affordable housing, green space and any necessary infrastructure enhancements. It goes further by setting out

that “*only three circumstances in which a site-specific viability assessment may be justified*” to allow Golden Rules contributions to be adjusted. These circumstances are for development on (i) brownfield land; (ii) for a multi-phase, strategic site; and (iii) for a development model which is of a “*wholly different type to that assumed in the viability assessment that informed the development plan*”.

- 2.45 The consultation explores the feasibility of testing viability at the plan-making stage, using a standardised national benchmark land value for proposals that involve greenfield, Green Belt land.

Achieving Well-Designed Places

- 2.46 The draft policies on place-making have recently been accompanied by a separate consultation by MHCLG on new Planning Practice Guidance – Design and Placemaking.¹ Policies DP1 to SP4 supplement this by setting out the strategies and key principles for good design and for delivering well-designed places.
- 2.47 Policy DP2 is a key change and moves away from the previous legal requirement for the provision of local authority-wide design codes. Instead there would be streamlined principles for the use of design guides, codes and masterplans. There are additional references in Policy DP3 to climate change adaptation and the transition to net zero. The principle that development that is not well-designed “*should be refused*” is retained. At Policy DP4 there is a “*firmer stance on encouraging design review and ensuring its outcomes are taken into account*”.

Promoting Sustainable Transport

- 2.48 The vision-led approach to transport planning that was a feature of the current NPPF is replicated in the draft. Policy TR1 advocates early engagement during plan-making and makes explicit reference to the Gov.UK Connectivity Tool² which aims to visually demonstrate how sustainably located a place is.
- 2.49 Transport policies go further than the existing NPPF by requiring local parking standards to be included in development plans, rather than this being optional (Policy TR2), and by taking a more “*permissive*” approach to maximum parking standards. Key changes to terminology are evident in Policy TR3 where the term “*significant development*” is replaced by “*significant amount of movement in the context of the area within which they would be situated*”. There is now explicit reference to the needs of older people, children and people with disabilities (Policy TR4).
- 2.50 When assessing transport impacts (Policy TR6), wording is amended from proposals that “*will*” generate significant amounts of movement is replaced with proposals that “*are likely to...*”. The choice between the submission of a Transport Assessment and a Transport Statement should be “*proportionate to the scale and significance of issues*”. TR6 retains reference to the term “*severe*” adverse impact when assessing whether development proposals should be capable of proceeding (i.e. a severe adverse impact on capacity and congestion, including cumulative impacts).

¹ [Design and Placemaking Planning Practice Guidance: consultation document - GOV.UK](#)

² [Connectivity Tool - GOV.UK](#)

Promoting Healthy Communities

- 2.51 These paragraphs place an emphasis on understanding local communities to determine deficits in the availability of community facilities and public service infrastructure. Policy HC1 provides guidance regarding the expected contributions from development; land allocations; the setting of local standards for the provision of different types of outdoor recreational land (including allotments); and encouraging exploring wider opportunities for the promotion of good health, the prevention of ill-health, and social interaction.
- 2.52 There is a minor change to the wording of Policy HC2 (Local Green Space), which should now be “close” rather than “reasonably close” to the community that it serves.
- 2.53 Policy HC3 is important as it specifies the principles regarding the delivery of community facilities and public service infrastructure that should serve new development. This is important where development “*could have a significant impact on the number of people needing those services*”. Policy HC6 seeks to protect existing “*key community facilities and public services*”
- 2.54 The existing NPPF seeks to resist hot food takeaways and fast food outlets close to schools and other places where young people gather. There is a change of wording in this consultation version; “*reasonable*” walking distance is the proposed guidance, to avoid any ambiguity that the policy applies to such uses that are a considerable but “*walkable*” distance away. It is interesting that the consultation asks for views regarding the term “*fast food outlets*”.
- 2.55 Policy HC7 seeks to retain open space, sport and recreation facilities, but has been expanded to include “*other formal and informal play space and allotments*”. The same policy changes the expectations regarding the potential for replacement recreation land where loss of existing land may be acceptable. Instead of the current requirement for equivalent or better provision in terms of both quantity and quality, this has been amended to “*better provision in terms of quantity and/or quality*”. The consultation explains that this change is to provide additional flexibility in how replacement space is delivered, whilst maintaining the “*no net reduction*” in provision.

Pollution, Public Protection and Security

- 2.56 The inclusion of policies seeking to protect public safety and amenity means that these policies need not be repeated in any local plan. The policies include those relating to ground conditions (Policy P2), and living conditions and pollution, including ensuring that proposed developments have adequate daylight, sunlight and are protected from adverse levels of air, noise, artificial light, water, soil and other pollutants (Policy P3).
- 2.57 The so-called ‘agent of change’ principle, which seeks to mitigate the impact of development upon existing activities and uses, is made more explicit at Policy P4. Development proposals should “*be capable of being integrated effectively*” and those existing activities “*should not have unreasonable restrictions placed on their current*

or permitted operation". Without suitable mitigation, the proposed development would be considered unacceptable.

- 2.58 A new policy (Policy P5) sets out the provisions for considering safeguarding areas around hazardous installations, nuclear sites and other areas where public safety and security is paramount.

Managing Flood Risk and Coastal Change

- 2.59 The draft policies relating to flood risk are revised, but there are no major changes since the September 2025 updates to the National Planning Practice Guidance regarding the sequential test.
- 2.60 The policies still make it clear that it is important to consider both current and future flood risk (Policy F1); the need for adopting a "*risk-based approach*" when identifying suitable locations for development in plan-making (Policy F2); and the continued need to "*manage*" coastal change by taking into account shoreline management plans and other national resources when considering development in coastal areas (Policy F3). Development in areas that are shown at being at risk on the national coastal erosion map should now be subject to the same tests as development within Coastal Change Management Areas (Policy F9).
- 2.61 Decision-making regarding flood risk assessment is relatively unchanged at Policy F4. However the afore-mentioned September 2025 changes to the sequential test are now incorporated in the draft NPPF at Policy F5, including the clarification that a sequential test is not required for sites where a site-specific flood risk assessment demonstrates that (i) built development would not be at risk of flooding from any source, now and in the future; and (ii) a site is at risk from surface water flooding only, but the proposed "*layout, design and mitigation measures*" ensure that the occupants and users would remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere.
- 2.62 Other policies in this chapter aims to consolidate details regarding the application of the flood risk exception test (Policy F6) and provides a criteria-based approach to ensuring development is safe from flooding (Policy F7). There is a welcome addition at Policy F8 which requires sustainable drainage systems to be designed in accordance with the national standards, thus providing consistency in approach.
- 2.63 A separate Annex F is proposed to incorporate the current NPPF flood risk policy and national planning practice guidance.

Conserving and Enhancing the Natural Environment

- 2.64 The main changes to the natural environment policies reflect recent legal requirements, including the amended legal duty in the Levelling Up and Regeneration Act 2023 that relevant authorities should "*seek to further*" the purposes of National Landscapes when exercising their functions (Policy N4). Major development within protected landscapes should only be supported in "*exceptional circumstances*".

- 2.65 There are new provisions during plan-making to set standards for green infrastructure, and a change in policy (Policy N1) to limit the circumstances where plans may seek biodiversity net gain (BNG) contributions which exceed the statutory requirements. Higher contributions will only be justified on specific allocated sites and should not apply to development that is exempt from statutory BNG.
- 2.66 The revisions make it explicit that landscape character and existing natural features are matters to be considered, and that a suite of tools ranging from the application of BNG, through the actions deriving from Local Nature Recovery Strategies may be used to secure improvements for nature (Policy N2). The same policy also strengthens the requirement for specific biodiversity features, including swift bricks, mandating that development proposals “*should incorporate*” them into their construction proposals “*unless there are compelling technical reasons which prevent their use, or would make them ineffective*”.
- 2.67 The consultation takes the opportunity to clarify the hierarchy of international, national and local designated sites of biodiversity importance, including irreplaceable habitats. Policy N6 anticipates the introduction of Environmental Delivery Plans, but perhaps its most significant change relates to the introduction of wording clarifying protection for sites of local importance (a matter that is not suitably addressed in the current NPPF).

Conserving and Enhancing the Historic Environment

- 2.68 The final main chapter relates to the historic environment. It is clear from the narrative from Government that the interaction between the special duties in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the application of heritage policy has become one of the most complex areas and has “*led to heritage becoming a regular ground for legal challenge*”.
- 2.69 The redrafting aims to shift the focus to facilitating the sustainable redevelopment of heritage assets to support growth. Notwithstanding this, the Government poses a question regarding the possibility of extending the ‘special regard’ duties beyond listed buildings and conservation areas, to include other heritage assets (e.g. World Heritage Sites; Registered Parks and Gardens; Scheduled Monuments).
- 2.70 Policy HE4 combines the approach to securing the conservation and enhancement of all heritage assets (i.e. both designed and non-designated heritage assets). Decision making policies on heritage would also include clearer guidance on the “*full range of impacts*” (Policy HE5). This includes rewording of the current NPPF provisions regarding the assessment of the degree of harm. The new NPPF makes it much clearer that proposals should be assessed to identify whether they would have a positive effect on the significance of the asset (including enhancement or the better revealing of the asset); or have no effect; or result in harm to the significance of the asset (where the degree of harm should be identified as ‘substantial’ where the proposal would “*seriously affect a key element of the asset’s significance*”; or cause the total loss of the significance of the heritage asset.

2.71 Other key changes include the removal of the concept of “*optimum viable use*” (Policy HE6). This is because the Government is keen to allow greater flexibility where proposals “*cause harm not considered to be substantial*”. Reference to “*substantial*” weight is consistent across the new NPPF, and in this section it replaces the previous reference to “*great weight*”. Development that causes substantial harm or the total loss of the asset should be refused unless the development is necessary to “*achieve substantial public benefits that outweigh the harm or loss*”, subject to certain criteria.

Annexes

2.72 There are different annexes relating to both main documents that are the subject of this consultation (i.e. the proposed reforms consultation document, and the draft NPPF itself). These annexes are summarised in the table below and overleaf.

	Proposed Reforms Consultation Document	Draft NPPF
Annex A	Data Centres and On-site Energy Generation – consultation questions regarding the existing and proposed consenting regimes for these types of uses.	Implementation – clarity regarding the date when the NPPF would take effect (day of publication) and further guidance regarding decision-making and plan-making. Annex A also contains a list of Written Ministerial Statements and other documents that would be superseded by the NPPF.
Annex B	Viability: Standardised Inputs in Viability Assessment – consultation questions include growth testing (for large, multi-phase development schemes); technical detail regarding expected developer returns; landowner premiums; the value of alternative uses; and benchmark land values.	Glossary – similar to the glossary that exists in the current NPPF.
Annex C	Reforming Site Thresholds – consultation questions that relate to a proposed new ‘medium’ category definition of 10-49 housing units for SME developers and the consequential impact upon other associated regulations. This follows the MHCLG working paper in May 2025 ³	Information Requirements – this ties in with proposed Policy DM2 and summarises that information that is specified in the draft national decision-making policies.
Annex D	N/A	Housing Calculations and Supply – this sets out how housing need should be calculated using the standard method, and how the Housing Delivery Test should be applied. It is to be read alongside other parts of the NPPF, including Chapters 4 and 6).

³ [Planning Reform Working Paper: Reforming Site Thresholds - GOV.UK](#)

Annex E	N/A	Green Belt Assessments – this provides guidance regarding the content of GB Assessments and the judgement to be applied when considering whether land is Grey Belt.
Annex F	N/A	Managing Flood Risk and Coastal Change – this includes the definitions of each Flood Zone and the flood risk vulnerability classification.

3.0 Key Implications for the Lancaster District

- 3.1 The decision to make decision-making policies in the NPPF non-statutory is, in our view, a missed opportunity. The implications for the Lancaster District are similar to the implications for other local planning authorities and users of the planning system. The use of statutory policies would have removed the requirement for local, bespoke policy production. It would have led to a more consistent and thus predictable national planning system and would have reduced the resource implications for local planning authorities.
- 3.2 However the structural changes to the layout of the NPPF (see paragraph 2.4) are logical and will provide for greater clarity when considering the application of national policies.
- 3.3 The aspirations regarding reviewing Local Plans every 5 years are not considered to be realistic. In practice, this may lead to less certainty regarding development proposals and place increased burdens on under-resourced local planning authorities. Our consultation response advocates for a period of 10 years instead. We have also recommended a similar time period for the new Spatial Development Strategies.
- 3.4 The response also expresses concern regarding the level of evidence that is necessary to support plan-making. The new NPPF represents an ideal opportunity to stipulate the core elements of plan evidence (either as an annex to the NPPF or in planning practice guidance) and reduce unnecessary time and expense from the process.
- 3.5 One of our main disagreements with the proposals relates to the intended removal of local planning authority’s ability to set local standards, such as those for energy efficiency. The Government’s concern is that local policy hampers the industry’s ability to “*adapt*” or deliver “*at scale*” and that these issues are “*matters best left to the market to determine*”. We make the point that this concern is not evidenced, nor has there been an Impact Assessment that suggests that the issue is problematic. We strongly advocate the retention of the opportunity to set local standards where evidence proves that they are (a) desirable; (b) viable, and (c) deliverable.
- 3.6 Generally we consider that the proposals relating to the issue of mitigating and adapting to climate change are not helpful. They broadly support the principle of

climate change mitigation/adaptation, but this is often not reflected in detail. The NPPF could have been far more ambitious in empowering local areas to deliver radical reductions in greenhouse gas emissions. Our responses to questions 18, 42, 43, 44, 47, and 96 provide further specific detail. Some of our responses also highlight the disproportionate impacts of climate change on a range of under-represented groups.

- 3.7 Policies S4 and S5 relate to development within (S4) and outside (S5) settlements and they will be the key policies influencing the distribution of future housing (in particular). We partly agree with the circumstances that are listed in S4 and we believe that these are important to ensure the best and most efficient use of land within settlements. We make the observation that S4 could be strengthened to consider the implications of new development against the existing character and scale of the settlement. However we strongly disagree with the proposed approach to development outside settlements. Whilst some of the categories of development outside settlements are sensible (and reflect existing guidance), the addition of S5(h) relating to proximity to railway stations, and S5(j) relating to development that would satisfy unmet need, would, in our view, lead to damaging impacts on the countryside in our district, including areas of high-value landscape quality. Our concerns mean that we are unable to agree with the proposed revised approach to the presumption in favour of sustainable development (Policy S3).
- 3.8 One of the headlines arising from this consultation is the Government's intended use of distance to a "*well-connected*" railway station as an indicator of potential sustainability (i.e. targeted growth locations). We advocate for a more nuanced set of indicators, including distance to bus stops, relationship with towns and villages and the proximity of schools.
- 3.9 We raise concern that the amended methodology for calculating future housing requirements (which continue to use a stock-based approach for calculations) fails to link with the demographics or economic conditions of the local authority area. This could have implications across the district where need may be unmet in some areas, and lead to an oversupply in other locations. Our response argues that the continued burden of unrealistic housing numbers will likely lead to land having to be allocated where the demographic need for that growth does not exist. Similarly, we are concerned by changes to wording regarding the Housing Delivery Test, particularly the removal of the word 'lower' from the proposed text (i.e. the housing requirement is the *lower* of the adopted housing requirement or the relevant local housing need figure). Annex D is clear in establishing how housing need should be calculated; how land supply should be assessed and how the Housing Delivery Test is applied. For districts like Lancaster, delivering sufficient housing land remains challenging because of the spatial constraints and landscape/environmental designations. It will mean that the Council will need to explore every opportunity to deliver the housing need calculated via the standard method during this new Local Plan. A failure to meet housing need will, under the new plan-making system, likely result in an inability to submit the Local Plan for examination (this is because the outcomes of the final Gateway 3 Local Plan Assessment - which permits submission for examination - are mandatory. If the

recommendations and outcomes of the independent assessor are not adhered to, including regarding housing need, then the Local Plan cannot advance).

- 3.10 The proposals for providing social and affordable homes provide greater discretion for applicants to deliver cash payments in lieu of on-site delivery (on smaller and medium sites). This is justified in the NPPF because small and medium housebuilders “*continue to face challenges in finding buyers for on-site social and affordable housing provision*”. Whilst this flexibility may assist with stalled sites, we articulate the risk that commuted sum payments may be difficult to spend, particularly in some rural areas (the commuted sum will often be less than the value of the affordable housing that should have been provided). We also highlight the previous good use of commuted sums in the district (Question 68). We believe that there is a continuing gap in guidance regarding calculating equivalent value commuted sums.
- 3.11 We highlight the implications for the Lancaster District in relation to requirements for traveller sites if there is no local connection test within policy. The absence of such a test would disproportionately impact our district, which already has the largest number of traveller pitches in the county.
- 3.12 We support the need for more relevant national strategies for economic growth and the allocation of business land, and we consider that the NPPF is sufficiently positive in terms of modernising agricultural operations and agricultural diversification (Policies E2 and E4) and the functioning of rural economies in particular. The introduction of a dedicated freight and logistics policy is positive, but it could go further in addressing the wider transport and environmental impacts associated from freight activity. As is the case with most of the document, the policies should not be read in isolation. Meeting the operational and spatial needs for economic growth should not be at the expense of good place-making principles and climate change mitigation.
- 3.13 In respect of town centres, we consider that the proposals could offer additional clarity on balancing growth and city centre diversification with protecting each centre’s distinctive character (i.e. avoiding clone town-ism). The sequential test (i.e. ensuring that town centre uses involving new development should be located within town centres and if that is not feasible, then on edge of centre locations, before considering out of centre sites as a last resort) should, in our view, be retained. This would serve to protect our existing centres from out of centre development.
- 3.14 The changes to Green Belt and the introduction of the concept of Grey Belt are already enshrined in the existing NPPF and planning practice guidance. The changes proposed via this consultation streamlines the Grey Belt definition which, irrespective of our concerns regarding criteria, should at least make decision-making clearer. We also consider that proximity to accessible public transport should not be at the expense of the protection of the Green Belt. We are pleased to see that “*wider environmental benefits*” may constitute the very special circumstances where renewable and low carbon energy development may be acceptable in the Green Belt.

- 3.15 The NPPF would remove the legal requirement of authority-wide design codes. But we believe that more clarity is required for the development sector regarding the use of design guides, design codes and masterplans. We strongly consider that good quality local engagement regarding plan-making and strategic site delivery should include young adults and children.
- 3.16 In response to question 148 (principles for development proposals and the creation of well-designed places), we provide a set of specific observations that can inform the quality of places. Our message is that design and layout should not treat certain issues as an afterthought in the design process. This often leads to undesirable outcomes.
- 3.17 Question 152 is particularly interesting because it raises the profile of the MHCLG's Connectivity Tool, which we believe could be a useful informant of locational sustainability.
- 3.18 We are encouraged by Policy TR4(1a) prioritising pedestrian and cycle movements within schemes and in neighbouring locations. We believe that there should be additional clarity regarding the use of Transport Assessments and Transport Statements.
- 3.19 Another positive change is the minor wording amendment which requires Local Green Space to be "*close*" to the community it serves, rather than the previous wording of "*reasonably close*". We maintain our view that replacement open space provision should be of a better standard of provision than exists already and be relevant to the local area's open space requirements.
- 3.20 Local planning authorities across the country will welcome the clarification that sustainable urban drainage systems (SuDS) should be designed in accordance with the national standards. We advocate for greater multi-functional benefits from SuDS design, including the protection of soils.
- 3.21 Reference to the National Coastal Erosion Risk Map ⁴ is also welcome in setting out those areas that are vulnerable to coastal change. This amendment aligns with the existing planning practice guidance.
- 3.22 At questions 179-184, we provide detailed observations regarding planning for the natural environment, including the approaches to biodiversity net gain. Our comments are broken down to assess the individual components of the proposed policies. One of our areas of concern relates to Environmental Delivery Plans. We highlight the district-specific issue of recreational disturbance on the bird populations of the Morecambe Bay and Duddon Estuary Special Protected Area and suggest that the best method to address this is via a system of payments, similar to existing schemes that are operational elsewhere in the country. However we also highlight procedural complications and the lack of resources at Natural England to operate such a scheme.

⁴ [National Coastal Erosion Risk Mapping \(NCERM\) - National \(2024\)](#)

3.23 There are positive changes, in our view, to the sections regarding heritage. Greater guidance (and more explicit reference) to conservation areas is welcome, and the change in approach to considering the impacts upon designated heritage assets (Policy HE6) is logical. We make the point that the existing term “*less than substantial weight*” downplayed harm that was not deemed “*substantial*” and its removal from the NPPF is welcomed. We also believe that replacing the existing “*great weight*” with “*substantial weight*” better reflects the statutory provisions of the duties in the 1990 Act.

3.24 We comment that local lists should incorporate all non-designated heritage assets within the district; and we request additional national guidance regarding the content of heritage impact assessments. The guidance could go further by introducing a standard format for heritage statements, and providing greater guidance regarding design, materials and specifications (which are often relayed across various sections of a planning application/listed building consent application and can conflict with each other).

3.25 All local authorities will need to take account of the changes to the consideration of retrospective planning applications, where there has been a proven intent to circumvent the planning system. We agree with the principle of additional weight being attributed to intentional unauthorised development when making planning decisions.

4.0 Next Steps

4.1 Officers welcome the input of PPCAG and Planning Regulatory Committee Members prior to submission to MHCLG. Separate consulting arrangements are, at the time of writing, being arranged for Council Business Committee on 19 February 2026.

4.2 The response will be submitted ahead of the consultation deadline.

Appendices

Appendix A

Draft response - ‘Questions on proposed reforms to the National Planning Policy Framework and other changes to the planning system’ **(Attached)**

Appendix B

Link to [National Planning Policy Framework: proposed reforms and other changes to the planning system](#)

Appendix C

Link to [National Planning Policy Framework: draft text for consultation](#)

Appendix A: Questions on proposed reforms to the National Planning Policy Framework and other changes to the planning system

- 1) **Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?**

We are concerned that the failure to make the National Development Management Policies (NDMP) statutory is a missed opportunity to make the national planning system simpler (especially plan-making), and to alleviate workloads for all local planning authorities and other users of the system. We would advocate for a reversal of this decision.

We do not foresee any alternative to the introduction of secondary legislation to deliver statutory policies.

- 2) **Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?**
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.
- a) **Please provide your reasons, particularly if you disagree.**

We welcome the revised structure to the NPPF, and in particular the greater distinction between plan-making and decision-making policies. The Introduction is helpful in re-establishing the purpose of the Planning System. We consider that the layout makes the Framework simpler to navigate and will ensure that it acts more like an unambiguous rules-based guide.

- 3) **Do you agree with the proposed set of annexes to be incorporated into the draft Framework?**
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.
- a) **Please provide your reasons, particularly if you disagree.**

Yes, the use of annexes for the presentation of detailed, complex and technical subject matter is appropriate and they ensure that the format of the main NPPF remains accessible. However we would advise against the addition of future annexes for any subjective matters (such as design).

- 4) **Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?**
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Yes, but only incorporated as an Annex.

5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree

a) Please provide your reasons, particularly if you disagree

Yes. In particular, removal of the potential conflict caused by the interpretation of “substantial” and “great” weighting is supported.

6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Agree, the re-emergence of more strategic policy thinking is welcomed. Since the abolition of the regional tier of plan-making in 2010 it has created a vacuum where cross boundary strategic thinking can only take place through the process of Duty to Cooperate. This means that consideration of strategic matters of infrastructure delivery and targeting development needs have all be undertaken on sometime an ad-hoc basis. The future role of Spatial Development Strategies (SDS's) presents a positive opportunity to re-establish strategic plan making across all areas of the Country.

7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?

Whilst the need to be responsive to changing events is a valid reason for attempting to make SDSs more flexible having a stable plan is also equally important. Having planning documents which change their strategic thinking on potentially such a regular basis provides neither stability or certainty to any party, whether that be the local planning authority, the development industry or the local community.

It is recommended that SDS's have a minimum lifespan of 10 years to create such certainty to all key stakeholders with on wholly exceptional circumstance to where an early review is necessary. This could include a significant change to housing need, but this should only be in the context of either persistent under delivery or the loss of key development sites.

8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local

housing need? **Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

The national policy position would need to be amended to be reflective of the ambitions around retaining SDS's for more than a 5 year period.

9) Do you agree with the role, purpose and content of local plans set out in policy PM2? Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Whilst the proposed content of a Local Plan, as described in paragraph 1 of PM2 is supported, there are a number of concerns around the length of time which is anticipated to preparing local plans, which is not attached the reality of other aspects of plan-making, in particular the increasing demands of Government around increasing engagement and stakeholder participation in the process. Further direction should also be provided to describe the implications of local planning authorities not meeting this 30-month aspiration.

Furthermore, the aspirations around reviewing local plans every 5 years is not realistic. As with SDS's the preparation of local plans should seek to provide certainty to all parties engaged in the plan-making process, the local community, the development industry and the local planning authority itself. The expectation of reviewing a plan every 5 years (as is the implication of paragraph 3) is wholly realistic, it will lead to a continual churn of plans being prepared and quickly being reviewed.

Not only will it lead to great uncertainty in the process, it does not reflect the lack of resource within local planning authorities to undertake this work, both financially (to update the relevant evidence to underpin a sound plan) and also the staffing resource required. The Government, whilst placing greater demands of local planning authorities in terms of the scale and speed of plan making, still have not provided anywhere near enough resource to support this expectation.

10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No

a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.

Whilst it is necessary to provide stability and certainty to the content of a local plan for a greater period of time than 5 years. It is recognised that plans need to be flexible and adaptable to change. Therefore 15 years is too long a period to accurately provided this.

It is felt that a lifespan of 10 years represents a reasonable balance between providing the certainty and stability needed again the need for a plan to respond positively towards changing local circumstances.

11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

The general principles set out in PM6 represent a strong and positive starting point for plan-making. But this has to be put into the context of the 30-month plan-making period, particularly in regard to the extent and implications of points (d) and (e).

12) Do you agree with the approach to initiating plan-making in PM7? Strongly agree, *partly agree*, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree

If local planning authorities stand any chance of preparing plans in the 30-month timeframe anticipated, then it is accepted that work needs to be front-loaded and there needs to be a clear plan for preparation ready at the outset. That includes all elements described in (a) to (d) of paragraph 1 of PM7.

13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? Strongly agree, partly agree, neither agree nor disagree, *partly disagree*, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

There are no objections to the role of evidence informing local plans. Evidence is at the heart of informing an objective and soundly prepared Local Plan and the content of PM8 accurately reflects the importance of evidence in that process.

However, the Government consistently fails to explain to local planning authorities what is meant by appropriate levels of evidence or, in the context to this consultation what is meant by evidence being '*relevant to the matters being considered by the plan; proportionate, so that it is focused and not necessarily extensive*'.

As always it would be beneficial for local planning authorities to understand what is considered by the Government to be core elements of evidence which all local plans should seek to deliver, accepting that there will always be circumstances specific to a local area which may as a result lead to more evidence being required. This could quite simply be included either as an annex to this Framework or as part of the supporting practice guidance.

It is not clear why the Government have been so consistently hesitant to provide this guidance however, if it were to be provided, it would help ensure that local planning authorities didn't prepare unnecessary and over-proportionate evidence which they do in order to protect themselves from risk as they advance their plans.

14) Do you agree with the approach to identifying land for development in PM9? *Strongly agree*, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

No additional comments to make.

15) Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11? *Strongly agree*, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

It is highly beneficial for all parties to talk to their neighbouring planning authorities to ensure that any cross boundary issue is well understood, explored and any outcomes agreed upon. Whether this is considered under a 'Duty to Cooperate' process or 'Duty to Support' does not fundamentally alter its importance.

Consideration needs to be given on how these engagement processes filter through to the preparation of Spatial Development Strategies where they are undertaken at a regional level.

16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree.***

a) Please provide your reasons, particularly if you disagree.

Many communities consider that the development industry has a consistent track record of seeking to water down the contributions required of them through the planning application process. This can be via removing policy obligations such as affordable housing or removing infrastructure requirements as set out in the infrastructure delivery plan (which supports the local plan). It is very rare that local planning authorities see policy compliant development and decisions are regularly taken to balance the need for delivery against the issues of viability.

The content provided through PM12 provides little comfort that this national framework will adequately ensure that new development comes forward with the infrastructure necessary to support its sustainable delivery.

17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations? *Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Without further detail on what such review mechanisms could be it is not possible to comment on whether they would be beneficial or not.

18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree.***

a) Please provide your reasons, particularly if you disagree.

Our overriding consideration is that Policy PM13 should be deleted or significantly amended to support Local Authorities to set local quantitative standards in local plan policies.

The following text is proposed: *Any planning policies that propose qualitative standards for development should have a justified and robustly evidenced rationale for its inclusion.*

Section 19(1A) of the Planning & Compulsory Purchase Act requires that development plan documents, taken as a whole, include policies that ensure land use and development contribute to both the mitigation of, and adaptation to, climate change. The Climate Change Act further establishes that effective climate action must occur at both the national and local

levels. In addition, the Public Sector Equality Duty under Section 149 of the Equality Act 2010 reinforces the obligation to consider people with protected characteristics, many of whom are disproportionately affected by poor housing performance, cold homes, and overheating.

Rather than proposing restrictions that would prevent local planning authorities from fulfilling these duties, the government should instead provide clear guidance and support that enables LPAs to develop robust, evidence based and innovative local standards. These standards are essential for meeting local needs and for ensuring a safe, liveable future.

The government recognises the need for local policy in PM13 for water efficiency in order to meet the stresses of local conditions. This is no different for energy, materials or design. Local planning policy exists to meet the specific characteristics, challenges, and needs of each area. Different places have distinct emissions profiles, development pressures, socio-economic needs, environmental baselines, and infrastructure constraints (including limitations in the electricity network) which national minimum standards cannot meaningfully address. Critically, setting this constraint completely undermines the ability of local communities to advocate for development which meets their unique needs and undermines community voice and participation. The government states that PM13 has been brought forward as they “*are concerned*” that local policy is hampering industry’s ability to “*adapt*” or deliver “*at scale*”. This concern is not underpinned by evidence, nor has an impact assessment been done as to the impacts which the weakening of a national position would cause. Indeed the evidence would appear contradictory to this. Across the country, LPAs have already demonstrated that locally tailored policy with quantitative standards can be robustly evidenced, viable, deliverable, and legally defensible, with years of successful implementation to draw on.

The Building Regulations represent a nationally applicable minimum standard. By design, national minimums cannot reflect local climate, infrastructure, or socio-economic conditions, or resolve area specific challenges. The most recent Future Homes Standard (FHS) consultation bills, net zero, and climate resilient homes. Its implementation has been delayed yet again, and the proposed 12-month transitional period would allow thousands of new homes to proceed without the improved standards the government itself is advocating. New homes could and should meet net zero performance today. The FHS will only produce net-resilient homes which will be net zero only when the electric grid fully decarbonises. This will increase near territorial emissions and medium-term territorial emissions and undermine wider local efforts to address climate mitigation.

Critically for adaptation, the climate is warming at an increasingly rapid rate. PM13 places limits on LPAs ability to address overheating. Compliance with Part O of the Building Regulations uses UKCP09 projections, not the updated UKCP18 which has greater seasonal variations including more robust heat extreme projections.

Fuel poverty, cold homes, poor ventilation and overheating disproportionately affects children and young people, women, vulnerable populations, minorities, and low-income communities. Local policy can and should be based on the most up to date data, needs and climate projections for their local areas and should be supported to deliver better outcomes for all residents. LPAs should retain the ability to set higher energy and climate adaptation standards (such as for overheating) where they are justified.

Neither PM13 nor the wider draft NPPF provides certainty on how embodied carbon will be managed. Despite the absence of robust national regulation, many developments nationally have already been successfully delivered in line with LPA requirements for whole life and embodied carbon assessments. This is a critical policy area given that embodied carbon forms a significant proportion of total lifecycle emissions and must be addressed to meet carbon budgets.

The Planning Practice Guidance on climate change is out of date (most is now close to 12 years old) and fails to provide LPAs with comprehensive or current guidance. The lack of clarity in the draft NPPF, particularly within PM13, prevents a full and informed response to the proposed policy changes.

The reason given by the government for restricting local policy on construction and layouts is that these “*are matters best left to the market to determine.*” This fundamentally contradicts the purpose of the planning system. Market driven solutions often create outcomes which conflict with both short- and long-term public needs. The market does not internalise costs which will burden communities, the environment and residents in the homes for the whole lifecycle of the development. In a severe housing shortage, as is currently experienced in England, the market has little incentive to improve quality beyond the minimum. Consequently, the market may deliver lower quality housing which would not be the choice of occupants if there were better choices available. The government has provided neither evidence nor impact assessment to justify this approach. There is a lack of provided evidence supporting the assertion that market-led design produces better or even adequate long-term outcomes. And there is no provided assessment of the risk and impact of poorly designed layouts on resident health, wellbeing, building energy use, building lifecycle carbon costs, climate resilience and development lifetime costs to society. It also provides no assessment on the need for good layout for occupant safety (such as in relation to designing out crime and the impact on the safety of women and girls as evidenced in the recent 'Violence against women and girls' (VAWG) strategy),

PM13 risks significantly limiting the ability of LPAs to secure the best outcomes for nature and the community. It may restrict opportunities to achieve nature recovery and ecological enhancement beyond the minimum Biodiversity Net Gain (BNG) requirements particularly in urban and built-up areas and it restricts the opportunity to develop other local standards required to meet local conditions and the needs of the local community. This includes many issues which are of importance to the local residents and which a blanket one-size-fits-all national approach may not be appropriate.

As written, PM13 restricts the ability of LPAs to meet the ambition of climate adaptation and mitigation as set out across other areas of the draft NPPF resulting in inconsistency across policy. Critically across a wide range of legislation, LPAs are legally required to meet climate objectives, but the proposal set out in PM13 will effectively prohibit them from using the tools necessary to do so. This creates conflict across the statutory duties of Local Authorities and increase the risk of legal challenge.

Local policy has consistently provided a test bed for raising standards nationally. Instead of constraining LPAs, the NPPF should empower them and give them the tools to innovate, meet local needs, and deliver tailored solutions to the diverse climate, environmental, and social challenges they face, as had been evidenced as possible by numerous LPAs across the

Country to date. Failure to allow this significantly undermines the purpose and value of the Local Plan and serves only to further disconnect communities from the planning system.

19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?

The tests of soundness remain a stable and clear approach towards the assessment of local plans, and it is agreed that these should remain the core principles of assessing the content and direction of plans.

20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?

No additional comments to make.

21) Do you agree with the principles set out in policy DM1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The overall principle is supported, however reference to the minimum necessary information to enable a decision to be made could result in less timely decision making, which would be the opposite of the intention of the policy. It is positive that the policy references local engagement with the community, consultees and the local planning authority (LPA).

22) Do you agree with the policy DM2 on information requirements for planning applications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We agree that each LPA will maintain its own policies to promote the economy whilst protecting the environment. It is the role of the local validation list to ensure that additional information not included within the national validation guide is catered for, and we agree this should derive from the requirements of policy within the Development Plan.

23) Do you have any views on whether such a policy could be better implemented through regulations?

No comment to make.

24) Do you agree with the principles set out in DM3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We agree with overall direction of the policy with respect to decision making. However when working with applicants in a positive and proactive way, this can unavoidably lead to decisions that are made outside of the statutory decision-making timescales. Therefore, this feels at odds with the current system. We endorse the need to only consult consultees if it is necessary.

With respect to point D we agree with the principle; however the critical issue here is that consultees need to be sufficiently resourced and then mandated to respond to consultations within the statutory period. This often does not happen at present. Without sufficient resourcing it is questionable whether this policy will be workable.

25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?

*Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The overall premise is to be supported, however not all schemes come forward that are located on allocated housing sites and therefore they will not have been through the viability testing phase. The policy needs to be re-worded to cater for this element. We would add that if a scheme has been viability tested during the application stage that there is no further provision for this to be re-examined following consent, given that the merits have already been assessed. This would provide greater confidence in the planning system.

We agree that where a developer submits a Section 73 application that seeks to reduce affordable housing provision based on a new viability assessment, the LPA should have regard to the harm that such a reduction may cause and should give this appropriate weight in the overall planning balance, alongside the wider merits of the scheme

26) Do you have any further comments on the likely impact of policy DM5: Development viability?

The critical issue is that at the plan making stage a robust (and pragmatic) viability exercise has to be based on reality and not on the aspirational wishes from the LPA.

27) Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?

Clearer national guidance would be helpful, and we acknowledge the work undertaken to date regarding the implementation of Section 73B of the Levelling-Up and Regeneration Act 2023. We note that Government intends to undertake a wider review of the statutory framework for modifying or discharging existing planning obligations. Both Section 73 and Section 106A can both be used, but we would question the effectiveness of Section 73 if there was no planning condition which could be modified. Section 106A may be preferable. We would advocate that a proportionate fee (i.e. relative to the complexity and issues arising from the application) should be required.

- 28) Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government's commitment to boosting the supply of affordable housing.

Developers take on risk when they seek to develop sites; it should not be for the local housing market to effectively subsidise the developer profit. If a developer can demonstrate to the satisfaction of the LPA that the development is unviable then re-consideration of the affordable housing scheme should logically follow.

- 29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

- 30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

We strongly agree that planning decisions need to focus upon the key issue of whether a development represents an acceptable use of land. More operational matters should be handled by the relevant regulatory regimes.

- 31) Do you agree with the new intentional unauthorised development policy in policy DM8? ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

We fully support the additional weight that is proposed to be attributed to intentional unauthorised development. Whilst we accept that retrospective applications should not automatically be refused, the fact that the works were intentional should attract substantial weight in decision-making. This approach needs to be consistent in planning (enforcement) appeal decisions too. Such a change would potentially reestablish some confidence in the planning enforcement system and may work as a deterrent. This needs to be coupled with swifter prosecutions and an increase in the fines thresholds.

- 32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?

- a) If so, are there any particular additions or mitigations which we should consider?

The intentional harm relating to the historic fabric of listed buildings is a key consideration. For example, if works are carried out to facilitate a change of use to a listed building, the wording of policy needs to act as a sufficient deterrent and indicate that retrospective applications will not be supported.

- 33) Do you agree with the new Article 4 direction policy in policy DM10? ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.

Yes, more flexibility on this issue is welcome.

We would also advocate that the process of introducing a new Article 4 Direction should be made as simple as possible, without recourse for Secretary of State intervention. The removal of permitted development rights via Article 4 is best determined by the local planning authority, based on robust evidence.

34) Do you agree with the proposed approach to setting a spatial strategy in development plans? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The ability to set a wider strategic strategy will allow for strategic issues, for example infrastructure delivery or targeting economic growth, to be undertaken at a higher more strategic level and provide greater direction to lower tier local plans without the need for unnecessary duplication.

35) Do you agree with the proposed definition of settlements in the glossary? ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

No additional comments to make.

36) Do you agree with the revised approach to the presumption in favour of sustainable development? *Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, **strongly disagree**.*

a) Please provide your reasons, particularly if you disagree.

Whilst a simplified presumption is welcomed, it is felt that the ambitions around Policy S5 mean that the implications of exercising the presumption in rural areas may have significant adverse implications which do not seem to have been fully considered and explored by this Framework.

But we consider that the ambitions of this Framework regarding development outside settlement areas goes too far, especially when suggesting that authorities which do not have a sufficiently strong supply of housing should support the delivery of housing in rural, isolated locations. Whilst the Framework provides circumstances where this would not be acceptable, these are considered to be weak and not sufficient to prevent truly unacceptable development from being permitted through this presumption.

The Policy also limits the opportunity for local authorities to take account of local circumstances with the wording in the subsequent policies of S4 and S5 relating to the assessment of schemes against national decision-making policies in the Framework only. The watered-down role of Local Plans in this assessment is of significant concern.

37) Do you agree to the proposed approach to development within settlements? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

It is recognised that in order to the make the best use of existing land that development should be prioritised to sites within existing urban boundaries provided a number of circumstances can be met. It is felt that while S4 does consider these circumstances it should also consider the implications of new development against the existing character of the settlement and provide a consideration to whether the scale of development being proposed is actually proportionate. Local policies would allow such considerations to be made. The inability to consider Local Plan policies within this balance is significant concern.

- 38) Do you agree to the proposed approach to development outside settlements?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree.***
- a) Please provide your reasons, particularly if you disagree.**

Whilst acknowledging in principle support for Policy S5, we have significant concerns relating to criteria (h) and (j). As currently worded the inclusion of these criteria in what are otherwise acceptable rural uses has the potential to result in residential development being directed to unsustainable locations something which we do not support. This is discussed further under our response to question 39.

- 39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree.***
- a) Please provide your reasons.**

Many categories set out in S5 are reflective of longstanding uses which have been considered acceptable in more rural locations. These remain appropriate.

However, criterion (h) and (j) seek to encourage a greater role for general housing stock to be provided in rural, more isolated locations which leads to greater dispersal of development impact and shows a lack of consideration for the implications of piecemeal, unplanned development in the countryside. The lack of housing supply should not be seen as a circumstance, or excuse, for the support of poorly planned and poorly located new housing. This is particularly the implication from criterion (j). The inclusion of criterion (j) would have the potential for particularly damaging impacts on the countryside, particularly in areas which have high value landscapes (which are not taken account of in S5) and therefore should be removed. The Framework (as a local plan) should be read as a whole and there is sufficient direction across the plan to support the delivery of new housing in sustainable locations without the need for criterion (j).

- 40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?** *Strongly agree, partly agree, neither agree nor disagree, **partly disagree,** strongly disagree.*
- a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.**

While supporting the direction of this policy in encouraging development in locations well served by sustainable transport this should not be at the expense of other planning

considerations which may warrant such locations unsuitable. The blanket approval of schemes in such locations should therefore be avoided.

Clearer definitions are also required in relation to how ‘well connected stations’ will be defined and the evidence base that will be used to assess service provision. The current definition is considered vague.

41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy? *Strongly agree, partly agree, neither agree or disagree, **partly disagree**, strongly disagree.*

a) If not, please provide your reasons

Whilst the inclusion of housing figures for neighbourhood plan areas are well meaning, the inclusion of such figures is not considered to be robust. Many neighbourhood plan groups would seek to dispute the numbers provided and any numbers which are included in a plan tend to be arbitrary and not sufficiently based on the very local circumstances of that specific plan area. It is not considered to be an effective or robust method of providing such figures and its recommended that such figures are undertaken on a case-by-case basis, ideally using some form of methodology which is provided within the Practice Guidance.

42) Do you agree with the approach to planning for climate change in policy CC1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree**.*

a) Please provide your reasons, particularly if you disagree.

The City Council agree with the broad intention of the policy to take a proactive approach to mitigating and adapting to climate change but strongly disagree with the proposed mechanisms and constraints to local plan making. Those most affected by climate change, children and young people, women, vulnerable populations, minorities, and low-income communities should be central to CC1 which should support local plans to address these impacts.

The NPPF should empower local areas to deliver radical reductions in greenhouse gas emissions. As drafted it is unclear how this can be achieved without the ability to set quantitative standards or address the full range of emissions associated with development.

The focus on climate adaptation, emphasis on long-term climate risks and provision for relocation of homes and other uses is welcome. Guidance should be provided based on the most recent climate projections and highest emissions scenario (currently UKCP18, RCP 8.5).

CC1 apply across all areas of plan making, not only spatial strategies and allocations and should include conversions and material change in use. Local areas have local carbon budgets, local infrastructure, and local needs which local plans should be supported to provide a local solution to.

Clear requirements to reduce operational and embodied carbon are required. Guidance should be provided to include Scopes 1-3 of emissions and for alignment with the governments carbon budgets, local carbon budgets and alignment with the Climate Change Act as noted in footnote 30.

The Framework fails to provide guidance for those locations where a spatial development strategy has yet to be prepared. It is not clear where, in the absence of this strategy, strategic guidance will be provided and how this should be assessed in the interim.

CC1 (1) The policy should require climate change mitigation and adaptation to be integrated across all policy areas from health to housing. It is welcome that a range of long term weather related climate risks is included. This should also include soil wetting and drying cycles.

CC1 (1) (a) The policy must not be constrained to the spatial strategy and allocations to be effective and must also include wider local and design policy. It should cover both new development and conversions or changes of use.

CC1: (1)(a)(i) It is welcome that baseline carbon assessments are expected to be provided. This should at a minimum include all territorial emissions and should be expected to cover a full lifecycle assessment of the development including Scopes 1-3. There should be a requirement for a carbon mitigation plan and levers for off/insetting any residual emissions. Robust guidance should be provided on the baseline assessments and policy guidance for setting quantitative emissions reductions targets across all development. Policy PM13 should be revised to allow for effective policy setting across emissions areas.

CC1 (1) (a) (ii) It is welcome that planning must be done around the relocation of development in response to climate impacts. The paragraph requires further detail and guidance on the relocation of homes and other uses at risk of coastal change, and the requirements this responsibility carries in plan making. Guidance should also be provided around vulnerability and risk.

CC1 (1)(b) – The approach to climate risk should apply to all development not just allocations. Further guidance is required in this policy area. Risk levels should be based most recent climate projections and highest emissions scenario (currently UKCP18, RCP 8.5) and be based on local circumstance.

CC1 (1)(c) Water efficiency standards should be expected across all local plans and all development types and not be limited to new development. Water efficiency policies should be based on most recent climate projections and highest emissions scenario (currently UKCP18, RCP 8.5). This paragraph should include rainwater harvesting and grey water recycling.

CC1 (1) (d) paragraph should include mention of ecosystem services and soil health. Plan-making policies should apply at the site level as well as wider strategic considerations.

43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, *strongly disagree.*

a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

The approach to mitigation should provide for the situation within local carbon budgets and set out meaningful approaches to achieving national and local mitigation targets across all emissions scopes. The policy should require an assessment of full life cycle emissions

including Scope 3 emissions and a mitigation plan. Guidance should be provided on how proposals should be assessed and include locally applicable guidance.

CC2 (1)(a) The paragraph should also include reference to increasing electric vehicle use where applicable to the development.

CC2 (1)(b) The paragraph should be positively focused to increase model shift and “*support good access to facilities within walking, cycling and public transport distance*” rather than seek to “*limit the need to travel.*”

CC2 (1)(c) This paragraph should go beyond approaches outlined in DP3(1)(c) and more comprehensively and holistically approach operational energy, healthy buildings and embodied carbon. It should include renewable and low carbon energy, ventilation and energy affordability.

CC2(1)(d) The requirement should be that the proposal ‘must’ maximise the re-use of existing structures and materials. There should also be a clear preference included for retaining existing structures over demolition. Whole lifecycle carbon assessments including Scope 3 emissions should accompany any demolition activity. The reference to ‘non-contaminated’ soil and hardcore should be removed. All soil and hardcore should be included as provision can be made for remediation/recycling.

CC2(1)(e) The paragraph should include that development should be designed to be heat network ready in areas where heat network zoning may apply. Development which creates waste heat should be expected to be future proofed for connection to a heat network regardless of if a heat network currently exists.

CC2(1)(f) Reference must be given to the protection and enhancement of soils as the largest terrestrial carbon store. The paragraph should also include the protection and enhancement of habitats within development sites which act as carbon stores.

CC2(1)(g) This should be accompanied by an assessment of full life cycle emissions and full accounting of Scope 3 emissions and a mitigation plan.

CC2 The paragraph should include reference to water efficiency. The policy should reference the protection of the historic environment.

44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

The approach to development within coastal areas is welcome as is the widening recognition of heat and drought related climate risk. The approach to adaptation must provide for the ability to situate assessment of applications within local climate contexts and set out meaningful approaches to addressing local adaptation needs. Specific recognition should be given to the disproportionate impacts of climate change on children

and young people, women, vulnerable populations, minorities, and low-income communities particularly with reference to local areas. Specific mention should also be given that green infrastructure should be planned with reference to climate projections. Provision for nature to adapt should also be included. Guidance should be provided on how proposals should be assessed. The policy should apply to new development as well as conversions and material change in use. Substantial weight should be given to retrofitting measures for climate adaptation.

CC3(1) A definition of what is included in the 'potential' impacts of climate change should be outlined in guidance. Impacts should be based on most recent climate projections (currently UKCP18) and be planned for the high emissions scenario. Clear, locally applicable guidance should be provided to support determination of applications. The assessment should be expected to include an equality impact assessment.

CC3(1)(c) The paragraph should include the protection and enhancement of soils for their function in the hydrological cycle. the use of SuDS to add other adaptation benefit such as urban cooling, and also include green and blue roofs and decreasing surface sealing.

CC3(1)(d) The paragraph should also include extreme weather impacts. DP3(1)(c) requires inclusion of wider design considerations for design methods required to effectively adapt to overheating which are included under the response to question 148. The approach should also seek to increase urban greening, trees and deliver green/blue roofs not just within new development but also proposals for conversions and material change in use applications.

CC3(1)(e) The phrasing of this paragraph should be amended to reflect a contextual approach to identifying at-risk sites. The policy should also contain consideration of design and materials of development for reducing fire risk. This should also be included in DP3(1)(c)

CC3: Policy CC3 should have a similar paragraph to that contained in CC2 (2) but relating to climate adaptation. Wording should give 'substantial weight' to retrofitting measures designed to reduce the impacts of climate change.

45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree.***

a) Please provide your reasons

CC3(1)(e) – The phrasing of this paragraph should be amended to reflect a local and contextual approach to identifying at-risk sites and accompanied with locally applicable guidance. The policy should also require consideration of design including ventilation and roof design, fire resilient materials, landscaping and blue features, protection of soils, water supplies and mains pressure, evacuation routes, and building air tightness. Design considerations should be included in DP3(1)(c).

46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?

Guidance should be developed from areas where there is high wildfire risk. The Framework should allow for local plan making policy to respond to local need, local climate,

environment and landscapes, and historic and cultural environment. Qualitative local policy should be supported for location specific needs such as setting building design aspects including ventilation and roof design, fireproof materials, landscaping and blue features, protection of soils, water supplies and mains pressure, evacuation routes, building air tightness, wildfire community protection plans. Requirements must apply also to conversions and material change of use.

47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?

The Framework should place emphasis on the urgency of climate change and provide for situating development within local carbon budgets and local climate adaptation needs. Local policy should be expected and enabled to deliver meaningfully on net zero across the full range of greenhouse gas emissions associated with development. All development plans should be required to deliver climate adaptations based on UKCP18, RCP 8.5. A greater focus on climate resilience should be included.

The critical need for local food growing areas should be included as well as insuring the delivery of allotments, community gardens and urban farms. Climate policies should link in with health policies. Specific recognition should be given to reducing the disproportionate impacts of climate change on children and young people, women, vulnerable populations, minorities, and low-income communities particularly with reference to local areas.

48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree.***

a) Please provide your reasons, particularly if you disagree.

Whilst we support the drive to deliver more housing expressed throughout the NPPF, we remain concerned about the amended methodology for calculating future housing requirements. The proposed amendments continue to use a stock-based approach for calculating future need.

This approach has no linkages with the demographic or economic conditions and trends of a local area. The approach continues to fail to take account of local circumstances which could lead to need and economic aspirations being unmet in some areas and in other areas where numbers have been inflated upwards risks producing housing numbers that have no ability of being delivered in respect of the availability of genuinely deliverable sustainable sites, the capacity of the market to deliver or importantly the existence of the community to need them.

It continues to burden authorities with unrealistic housing numbers that they have no prospect of delivering and where the evidential need for them in that location has not been demonstrated. It has the potential to lead to land being released where the demographic need for that growth does not exist, especially where the population of an area may in fact be declining or in some instances remaining static.

We have consistently strived to deliver growth through challenging housing targets driven by the economic prospects of the District and the demographic needs of its community. The

ability to deliver this growth has, like many areas, proved challenging with constraints impacting the availability of genuinely deliverable sites.

The NPPF as worded no longer makes provision for identifying those circumstances under which an authority may require a lower housing requirement where this has been demonstrated necessary following a robust assessment of supply and the presence of constraints and land availability.

As drafted the NPPF continues to place an unrealistic expectation on local authorities to deliver over inflated housing numbers.

49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) If so, what elements should this guidance cover?

Clearer guidance on how the demographic needs of these groups should be provided. The relationship of demographic data with the stock-based housing requirement should be made clearer.

50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites (PPTS) within this chapter? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The City Council would support the inclusion of requirement figures where it is supported by evidence and where it is recognised that the ability to deliver this need is influenced by both land availability and genuine sustainable opportunities. Failure to do so risks undermining the Local Plan and, as is the case with all types of development, risks schemes being promoted and approved in unsustainable locations.

51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If so, what are the key principles this guidance should establish?

Changes to PPTS have made assessing the needs of the Travelling community more complex (particularly the changes in the definition of Travellers) which has required studies to include data and site visits/interviews to existing sites and any others believed to be occupied by Travellers. On this basis GTAA's require a longer lead in time and a degree of co-operation from the Travelling community. Even with experienced consultants/field work staff, this can be extremely challenging. However, in our opinion and experience, the combination of data and site visits is more likely to provide better results. We welcome further guidance but even with this, it will not necessarily overcome some of the challenges around identifying Travellers. We also welcome the recent changes to PPTS which allows LA's to include Travellers who have ceased to travel because in excluding them, there is more likelihood of dealing with illegal encampments and unauthorised pitches.

52) Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The Council agrees that the wording included in Annex D is sufficiently clear and provides certainty to local authorities on the circumstances under which the relevant buffers apply.

Whilst recognising the purpose of the buffer in creating additional flexibility the City Council maintains that the buffer places an additional burden on authorities who are already facing significant challenges in delivering their housing requirement and in most instances will never be able to demonstrate a five-year supply.

53) Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

This should make clear how issues of over and under supply will be treated, with the NPPF currently silent on this.

54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

Whilst the intention and wording are clear, the reality of achieving this is questionable. Failure to demonstrate a five-year supply risks undermining the Local Plan and, as is the case with all types of development, risks schemes being promoted and approved in unsustainable locations. Lancaster district has the highest number of Traveller pitches in the whole of Lancashire. Whilst recognising the importance of identifying and meeting need, it has been incredibly difficult to find suitable sites that accord to own policy – i.e. in sustainable locations. A number of permissions have been granted since our GTAA was adopted in 2017 having regard to identified need, and in some instances, temporary permissions have been granted pending the identification of sites in more sustainable locations, but this has not proved possible even though we have an open call for sites. Any sites that have been nominated are in flood zone 3 (an area of the district where the largest number of sites have already been given historic consents) and any others were in very unsuitable or isolated locations.

55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

No additional comments to make, we agree with the identified measures.

- 56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

The identification of designated rural areas as locations for the establishment of affordable housing requirements for non-major residential developments is supported. This will ensure that affordability issues in rural areas can be addressed, providing a clear link between need and location.

- 57) Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

Ensuring that housing is delivered which meets the needs of an aging population and the needs of disabled people is vital. Proposals which help deliver this are supported by the Council.

- 58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

- a) Please provide your reasons, and would you support an alternative minimum percentage requirement?**

We currently have a 20% minimum requirement for M4(2) as part of the adopted Local Plan, but it is our intention that our new Local Plan will significantly increase that percentage (ideally to 100% unless there is exceptional justification for a departure from these standards on a case by case basis).

- 59) Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

- a) Please provide your reasons, particularly if you disagree.**

The establishment of requirements for the provision of specific types of housing on identified sites or parts of allocated sites is supported. In most instances this may provide the main mechanism for ensuring that the needs of different groups of the community are met.

- 60) Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***

- a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?**

The Council support this requirement. Implementation of this proposal will ensure that housing sites deliver the full mix of housing required by the community and will help to ensure that housing need across all tenures is delivered. We welcome the opportunity to increase the supply of social rented homes and meet other specialist needs in the district.

61) Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons

The Council agrees with this proposal and recognises the important and valuable role which small sites will play in meeting the future housing requirements for an area. The recognition within the policy that this may not always be possible is also supported.

62) Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

The policy places substantial weight on the delivery of accommodation which contributes towards meeting the evidenced need of the local community. Whilst this is supported the Council would question the extent to which the delivery of the new housing requirement based on a stock-based approach is an appropriate measure of need.

As referenced in previous responses the ability of an authority to deliver its housing requirement is extremely challenged, with housing requirements in an area often now significantly above the availability of sustainable housing sites. Measuring performance against these requirements via both five-year supply considerations and housing deliver test performance places an authority and its community under significant pressure and in most instances undermines an authority's ability to appropriately plan for its community when the delivery of need, based on inflated housing requirements, is given substantial weight.

63) Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Lancaster district already has designated accommodation (run by Guinness Trust) for those leaving HM Forces and alongside this, we have sought to ensure that HM Forces personal would be afforded reasonable preference for social housing alongside the national priority afforded for shared ownership. Further data on need by district would be helpful.

Managing housing pressures and meeting the needs of other homeless households and those in extreme housing need is challenging, and if there is evidence of need at a district level, then having more homes that are designated for HM forces personnel could ensure that supply aligns to need but as timing is crucial in matching need with supply, the fall-back position needs to be clear in the event that there are no identified HM forces households in need of that accommodation when it becomes available otherwise homes could be left unoccupied.

64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Lancaster City Council has formulated a suggested mix of market and affordable housing tenures and size typologies as the starting point for all new developments. Whilst recognising that most developers will have a preference to build larger 4-5 bedrooed homes which are most profitable and provide the best headroom for affordable housing delivery, this has to be balanced with meeting a local need i.e. also providing opportunities for first time buyers and people needing to downsize including households that may require accessible homes.

65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes?

*Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?

Whilst we support the principle of increasing the supply of social rented homes, with affordable rent as the default rented tenure since 2011, the council would need to re-test development viability in order to arrive at a suitable percentage. Even with our existing affordable housing targets, these are regularly challenged by developers and house builders because of the sharp increase in construction costs since the pandemic. We robustly challenge any attempt to re-negotiate affordable housing requirements through an independent assessor, but any further controls that can be put in place to prevent a reduced number of affordable homes being provided on new sites would certainly be welcomed.

66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?

***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If so, what changes would be beneficial?

The council has no direct experience of providing this type of accommodation so further guidance on this would be helpful in order to inform future policy making.

67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites?

***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.

In all circumstances, the council will seek to secure on-site affordable housing delivery and would only negotiate a commuted sum payment as a last resort.

b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances –

for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer

As a) above, only when every other possible option to secure on-site affordable housing has been exhausted (i.e. homes for rent and shared ownership through a Registered Provider) would a commuted sum be accepted.

68) What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).

The risks are that it may not prove possible to spend the commuted sum payments in the area where the affordable housing should have been provided on-site particularly in rural areas. The calculation of commuted sums will inevitably be less than the value of the affordable housing that should have been provided. That said, we have made very good use of any commuted sums previously held where a viability gap has been identified by Registered Provider partners (particularly with more modest grant rates since 2011) and on one occasion a commuted sum directly supported a community led development (partnership with an RP) which allowed the CLT to purchase the site. On other occasions, commuted sums have been used to offset the additional costs associated with special needs housing.

69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly? Please explain your answer.

We already have an existing policy that allows commuted sums to be paid to a Registered Provider, the council itself as a stock retaining LA with a HRA, or a community group for delivery of schemes providing 100% affordable housing and where a viability gap has been evidenced.

70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.

Further guidance to ensure that commuted sums due are a true equivalent of the on-site affordable housing would be welcomed.

71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Strongly agree on both quality and quantity and on quality to fit in with the council's own priorities on climate change and combating fuel poverty and as stated in question 68, to offset some of the costs associated with special needs housing.

72) Do you agree with the criteria set out regarding the locations of specialist housing for older people? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Accessibility to key services is important as is the delivery of proposals which meet the accessibility needs of the older population. This section should also refer to affordability with this also being a key issue for older people. The importance of energy efficiency should also be noted with fuel poverty being a key issue.

73) Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary? ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Based on our own experience, proposals of this nature must have the support and input of the relevant commissioning lead or body who will evidence need and suitability. There have been local instances where speculative providers have sought to bring forward specialist/supported accommodation without the knowledge or direct support of the relevant commissioning lead which may be wholly unsuitable, fail to provide the appropriate level of care and support or be in the wrong area. In Lancashire, there are more children's homes than any other local authority area and yet the commissioning team often fail to place looked after children within the county. The planning system needs to play its part in bringing some controls around this to safeguard vulnerable adults and children and measures to control some of the extortionate costs associated with these specialist placements.

74) Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary? ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We agree with the amended glossary wording and criteria identified. Assessment of future proposals must be set within the context of need as identified under paragraph 1 of Policy HO9.

75) Do you agree the proposals provide adequate additional support for rural exception sites? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, including what other changes may be needed to increase their uptake?

We consider that the emphasis on delivering affordable housing (to warrant an exception) is sufficiently strongly worded. We consider that HO10 (2b) might usefully remove reference to 1 hectare, and instead solely focus upon ensuring that development is commensurate to the size of the settlement in question (i.e. rely only on the % criteria instead).

76) Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

There has been little appetite for First Homes from local developers perspective, and our preference is to bring forward affordable homes that are owned and managed by Registered Providers.

77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?

We have no preference for the approaches set out.

78) Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

79) Please provide your reasons, particularly if you disagree.

We already have the largest number of Traveller pitches in the county, so there could be implications if no local connection test exists (recognising that this could be a difficult test for some Travelling families to meet). Equally there is a risk that the more proactive Local Authorities will be meeting the needs of other Local Authorities who are not doing enough to meet the accommodation needs of their own Travelling communities. Our current policy already directs new pitch provision to sustainable urban and rural locations, although as previously stated, there have been some circumstances where it has been necessary to depart from this policy

80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The policy is pragmatically worded, recognising the difficulty in delivering multi-phase, complex sites. It is helpful to include the flexibility of setting a shorter commencement timescale to ensure proposals are started without delay. It would be helpful to define “consenting framework” in HO13(3). Does this effectively mean any parent permission (such as an outline for the wider site?).

- 81) Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.**

We have no further comments to add to our response to Q.80.

- 82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? Yes, *no***
- a) Please provide your reasons.**

Not that should be explicitly included in the NPPF. The role of development corporations was appropriately considered in the New Towns Taskforce Report (28 September 2025). These corporations are the only logical solution, in our view, to establishing bodies of sufficient scale to single-mindedly create a new town, including land acquisition, infrastructure delivery and wider local engagement from the outset.

- 83) Do you agree with the proposed changes to the Housing Delivery Test (HDT) rule book?** *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.**

We do not support the removal of the word lower from the rule book. The removal of this text from the rule book places authorities under more pressure and will in many instances make it more likely for an authority to find itself subject to the sanctions resulting from a poor HDT performance.

When there are fundamental questions in relation to the methodology used for the calculation of local housing need figures, the authority is unable to support any amendment which would strengthen their use in reporting past delivery and would ultimately undermine an authority's ability to determine future planning applications. On that basis the proposed amendments are not supported.

- 84) Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***
- a) Please provide your reasons, particularly if you disagree.**

Greater emphasis on relevant national strategies and the need for flexibility in planning for economic growth is essential. Aligning local policy with national priorities ensures consistency, maximises opportunities for funding and investment, and helps Local Plans remain responsive to wider economic shifts. Many local economies are diverse and fast-changing, and overly rigid policy frameworks risk constraining innovation, limiting the growth of emerging sectors, and undermining the district's ability to respond to new market conditions. A flexible, forward-looking policy approach enables authorities to support evolving industries, adapt to technological and labour-market changes, and proactively guide sustainable economic development.

85) Do you agree with the approach to meeting the need for business land and premises in policy E2? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The approach set out in Policy E2 contains several positive elements. Giving appropriate weight to the economic benefits of commercial development (E1(a)) and recognising the importance of modernising agricultural operations (E2(1b)) are both constructive measures that support business growth and the functioning of rural economies.

However, the requirements in E2(2) would benefit from greater flexibility. Market signals, operational requirements and sector-specific locational needs can vary substantially, and an overly rigid approach risks constraining sustainable economic development or creating conflict with environmental and spatial objectives. Providing clearer criteria for how these competing factors should be balanced would support more consistent and transparent decision-making.

Further clarification is also needed on how “unmet need” should be evidenced. Without a consistent evidential framework, interpretation may differ between applicants and decision-makers, generating uncertainty and delays. Greater clarity here would help ensure the effective delivery of employment land and improve the usability of the policy.

86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree

The introduction of a dedicated policy for freight and logistics is positive, as this sector has distinct operational, spatial and transport requirements that justify clearer national guidance. A specific policy within the NPPF provides greater certainty for applicants and decision-makers and helps ensure that proposals are directed to suitable locations with appropriate infrastructure and transport connections.

The policy could benefit from a stronger emphasis on addressing the wider impacts associated with freight activity. This includes clearer expectations around reducing transport-related emissions, managing cumulative effects on the road network, and safeguarding environmental and residential amenity. Reinforcing requirements for sustainable transport modes, good design, and integration of low-carbon technologies would help ensure that freight and logistics development contributes to economic growth while supporting national objectives for climate mitigation and good place-making.

87) Do you agree with the approach to rural business development in policy E4? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The proposed redrafting of paragraph 88 improves alignment with wider policies relating to development inside and outside settlements through Policies S4 and S5, and offers stronger support for agricultural diversification, which is an important element of maintaining a vibrant rural economy. The policy could provide further clarity around how rural business

development should balance economic benefits with the protection of the countryside, environmental quality, and local character, as well as social impacts. Additional emphasis on the scale, design, and potential landscape or amenity impacts of rural development would help guide decisions more effectively.

88) Do you agree with the proposed changes to policy for planning for town centres? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The proposed drafting of Policy TC1 provides a coherent and strategic approach to planning for town centres, bringing together key principles into one policy, and placing greater emphasis on having an overarching strategy to guide development needs, opportunities for diversification/intensification, and the identification of areas suitable for public realm or infrastructure investment. The strengthened focus on making effective use of vacant sites, encouraging a broader mix of uses including residential, and aligning site allocations with the plan period rather than a fixed ten-year horizon provides welcome flexibility when considering site allocations and improves consistency with the wider plan-making framework.

We consider that the policy could offer further clarity on the mechanisms for how strategic approaches to town centres should balance growth and diversification whilst protecting their distinctive character, heritage assets, and local identity. While the recognition of the role of design guides, design codes, masterplans, and Article 4 directions is helpful, more guidance on when and how these tools should be applied would support greater consistency and ensure they effectively enhance vitality and viability.

89) Do you agree with the approach to development in town centres in policy TC2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If not, please explain how you would achieve this aim differently?

90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?

The change has had minimal effect since its introduction to the high street, however there are far more leisure, food and drink uses now which offer a more diverse town centre, but this will be at the expense of the more traditional high street uses.

We consider however there is current inconsistency between national policy (supporting the High Street), guidance and the flexibility of Class E in all locations (including non-town centre).

91) Do you believe the sequential test in policy TC3 should be retained? ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The test still plays a role in steering new development for town centre uses to locations which best support the vitality and viability of town centres. We strongly support its retention.

92) Do you agree with the approach to town centre impact assessments in policy TC4?

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

We consider that this element should be weighted in the overall planning balance, rather than comprising grounds for an outright refusal.

93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The policy is very supportive of development which is not a surprise given the Government's 10-year infrastructure strategy. We support the preference for utilising existing sites for infrastructure as opposed to new sites. We believe that this approach needs to be rigidly adhered to by telecoms operators.

94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Yes. Using existing sites to minimise visual impact is the preferred approach. A greater focus on the specifics of individual sites is required to ensure that applicants take sufficient account of the characteristics and appearance of the locality.

95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We would advocate that there is an additional requirement for the use of photomontages of proposed development in protected landscapes, conservation areas and those adjacent to listed buildings. These prove useful visual aids to help users of the planning system understand the visual impacts of a development.

96) Do you agree with the approach to planning for energy and water infrastructure in policy W1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

An additional requirement of this policy should be that both environmental assessments and greenhouse gas assessments are undertaken to inform decision making and to guide energy infrastructure into areas of least harm, particularly in areas of high ecological value, or areas of high sequestered carbon (for example see the methodology for Scottish wind farms). Development should also be made to consider fragmentation of habitats.

The Framework's proposal in PM13 limits the ability of LPAs to set quantitative standards for development which in turn could limit the ability to proactively support appropriately sized infrastructure within the competing land, resource and infrastructure constraints which exist within a local area. For example, setting higher energy efficiency standards for residential and commercial development could release pressure on areas of local grid constraint.

However the policy fails to provide guidance for how this should be planned for, the evidence needed to underpin it or how the policy should be prepared, particularly in the absence of yet to be published national and regional policy, strategy and guidance. It is not clear where, in the absence of this, strategic guidance will be provided and how this should be assessed in the interim.

97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? Strongly agree, *partly agree*, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

The approach to proactive planning for local low carbon and renewable energy in line with wider cross-cutting strategic energy policy is welcome. The focus on waste heat is also welcome; this however must be balanced with other planning considerations.

The Framework fails to provide guidance for how this Policy should be planned for, the evidence needed to underpin it, or how the policy should be prepared. It is not clear where, in the absence of this strategy, strategic guidance will be provided and how this should be assessed in the interim.

98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? Strongly agree, partly agree, neither agree nor disagree, *partly disagree*, strongly disagree.

a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.

The contributions of small-scale and community led development is welcomed.

Substantial weight should be given to the whole lifecycle emissions of the development, including any associated emissions that result from degradation of the local environment and soils. This should be applied to, at a minimum, development being proposed on peat soils (see our previous reference to Scottish wind farms.)

Weight should be given to the restoration of land if the development has a limited operational lifespan, and whether soil health and carbon can be recovered to a level equal or above that which was originally on site. Appropriate financial guarantees should be used to underpin planning conditions of site restoration.

All renewable energy development should also provide direct annual community benefit funds or other direct local benefit such as delivery of an Energy Local Club.

Renewable development should be expected to deliver multiple land uses and not sterilise land for other use. For example proposals which include business cases and design which support inclusion of agriculture such as Agri-photovoltaics should be encouraged.

As renewable development constrains open space, proposals should include improving and increasing access to rural areas such as through the improvement or delivery of PROWs, cycle routes and bridleways.

99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? *Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

No comments to make.

100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance? ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We strongly agree with the removal of coal from the list of minerals of national and local importance, and with the proposed prohibition on identifying new coal sites. However, we partly agree with M1 as a whole as outlined in the following observations.

The proposal to align policy with the phasing out of and reducing dependence on fossil fuels is welcomed. The proposal to remove shallow and deep-mined coal from minerals of local and national importance is welcome. It is also welcomed that development plans may not identify sites for peat or coal extraction. This supports the phasing out of combustion-based fuels and the critical need to deliver on climate mitigation, as well as providing vital protection to the ecology of peatland. It also offers the opportunity to address the socioeconomic impacts that such extraction has had on some communities with extraction often located in areas with the highest levels of deprivation.

However, there is a difference between a prohibition on allocating sites for coal or peat extraction, and in refusing development proposals. The latter of which is not included within this policy (however it is noted that in M5 there is a strict ban on approving peat extraction, but that coal is absent from this ban). It is recommended that a strong policy position is made on coal and peat extraction within plan making such that no sites may be allocated, and no permissions granted for such development.

This must however be holistically approached and should be combined with strong support for LPAs to drive down Scope 1 and 2 emissions through other areas of the Framework and Scope 3 emissions arising from fossil fuel associated emissions across the entire supply chain not only those associated with extraction of materials.

101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas? *Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

It is welcomed that the development plan should not plan for new or extensions to existing oil and gas extraction. However, M1 (4) must also reference the decommissioning and abandonment of sites within the phases of oil and gas development. These are integral components of the full project lifecycle and proposals should therefore be expected to provide a complete assessment of environmental impacts and responsibilities.

Any further development within licenced areas must continue to be required to provide full lifecycle assessment of greenhouse gas emissions including Scope 3 emissions and emissions related to the environmental (including) soil damage resulting from the development. There should also be included a requirement to prepare and submit carbon management plans, monitoring and reporting, onsite mitigation of emissions and meaningful off/insetting of Scope 1 and 2 emissions. Any further development within licensed areas must also provide direct annual community benefit funds or other direct local benefit such as the delivery of an Energy Local Club where there is electricity created on site. Any waste heat generated should be expected to support wider heat decarbonisation efforts by supplying that heat to heat networks or other uses.

Finally, any oil or gas development within licensed areas should be expected to restore the land to previous use or for other uses (including societal, cultural, historic, habitat environmental and climate) and not sterilise land for other future uses.

102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of ‘minerals of national and local importance’? *Strongly agree, partly agree, neither agree nor disagree, **partly disagree, strongly disagree.***

a) Please provide your reasons, particularly if you disagree.

We agree that critical and growth minerals should be added to the list ‘minerals of national and local importance.’ As far as possible minerals should be extracted within the UK, recognising the role that this plays in national security and global social responsibility and not outsource the damage that extraction creates to other countries where social, cultural and environmental protections may not be as strong. However, a focus should also be placed across the Framework on prioritizing the minimisation and use of virgin materials.

While minerals can only be worked where they are found, as written M1 (6) provides wide interpretation of where it may be appropriate to extract minerals and does not reference the need to prevent and in worst case mitigate/offset societal, cultural, historic, landscape, soil, biodiversity, habitat, environmental and climate loss or damage. Nor does the Framework seem to provide the levers for investment in mitigation and policy levers needed to meaningfully repair damage from mineral extraction. The policy fails to provide guidance on how this should be interpreted. It is not clear where, in the absence of this guidance, strategic guidance will be provided and how this should be assessed in the interim.

A stronger focus and priority must be placed on secondary and recycled materials and minerals waste. The critical need to reduce and minimise the extraction and use of virgin materials is key to ensuring a just net zero transition and supporting the circular economy. Any extraction activity must also include full life cycle emissions and full accounting of Scope 3 emissions.

Across all areas of the plan, the circular economy should be centred and provide LPAs the ability to set quantified targets for recycled materials and development of the circular economy.

103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

No comments to make.

104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals? *Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The weight must not just focus on the emphasised economic benefits but should also include societal and community benefit as well as those outlined in M3 (d) and historic benefit in M3 (e). There must also be balance with the losses and damages that the extraction will cause. This must holistically consider societal, cultural, historic, landscape, soil, biodiversity, habitat, environmental and climate damage arising from the proposed development.

A stronger focus and priority must be placed on secondary and recycled materials and minerals waste. The critical need to reduce and minimise the extraction and use of virgin materials is key to ensuring a just net zero transition and supporting the circular economy.

105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? ***Strongly agree**, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

106) Please provide your reasons, particularly if you disagree.

This exclusion is warranted as the extraction of oil and gas has far larger associated carbon emissions than the extraction of non-combustible minerals and should therefore be treated differently in the context of planning.

While some development for mineral extraction could conceivably have net benefits to the green energy transition and delivery of net zero, fossil fuels will always have a negative impact on climate in terms of the scope 3 emissions associated with the end use of the extracted fuels. ‘Substantial weight’ should not be given to onshore oil and gas extraction in this context, particularly given the requirements of the Climate Change Act 2008.

107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree**.*

108) Please provide your reasons, particularly if you disagree.

Reference should also be given to avoiding social, cultural, landscape, soil, biodiversity, habitat, environmental and climate loss and damage. The gendered impacts of mineral development must also be addressed.

Mineral development should provide direct annual community benefit funds or other direct local benefit. Any waste heat generated should be expected to support wider heat decarbonisation efforts by supplying heat to heat networks or other uses.

M4(c) Should seek to secure restoration to the highest environmental standards. Bonds or other financial guarantees should underpin the planning conditions to ensure that conditions are followed through and communities and the environment are protected.

- 109) Do you agree with approach to coal, oil and gas in policy M5? Strongly agree, partly agree, neither agree nor disagree, *partly disagree*, strongly disagree.**
a) Please provide your reasons, particularly if you disagree.

M5(2) The paragraph should include that the extraction of coal at new or extended sites should be refused. M5 (2) should also include facilitation of heat recovery for heat networks.

- 110) Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No**

No comments to make.

- 111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.**

No comments to make.

- 112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development? Strongly agree, partly agree, neither agree nor disagree, *partly disagree*, strongly disagree.**
a) Please provide your reasons, particularly if you disagree.

In M6 (3), reference should also be given to avoiding social, cultural, landscape, soil, biodiversity, habitat, environmental and climate loss and damage.

- 113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? Strongly agree, partly agree, *neither agree nor disagree*, partly disagree, strongly disagree.**
a) Please provide your reasons, particularly if you disagree.

No comments to make.

- 114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? Strongly agree, *partly agree*, neither agree nor disagree, partly disagree, strongly disagree.**

115) If not, what further guidance is needed?

Policy L1 provides a sufficient framework for developing local plan policy. The intention of this policy and the promotion of the effective and efficient use of land is supported. We would however note that whilst minimum densities can help to deliver this, it is important that site specific considerations are also considered such as heritage and townscape as well as the overall character and sustainability of the site. Further guidance on how a design led approach could be developed would therefore be supported.

116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***a) Please provide your reasons, particularly if you disagree.**

L2 is very specific and we would suggest that assessing whether a proposals represents efficient use of land is best undertaken at the local level. Phrases such as ‘*development footprints which optimise a sites development potential*’ are very subjective and may be interpreted as giving carte blanche for proposals that are insensitive in terms of scale and massing. Whilst the policy position is clear, we question whether the policy should be advocating the use of corner plots for accommodating taller properties. Whilst such plots may present an opportunity to deliver more distinctive buildings, we would suggest that height needs to be examined on a case by case basis through the determination process.

117) Do you agree policy L2 identifies appropriate typologies of development to support intensification? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***a) If not, what typologies should be added or removed and why?**

The general direction is accepted, however density is hard to achieve when topographical challenges exist.

118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***a) Please provide your reasons, particularly if you disagree.**

The policy provides a solid basis, however, is very specific and we would not agree that it is sufficiently high-level. The local context will always be important when making decisions on these types of applications.

119) Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.***a) Please provide your reasons, particularly if you disagree.**

The policy is positively worded, indicating that proposals may be acceptable if it satisfies one or more of the criteria (including L2(d)(i)). We would query whether this part of the policy

is necessary, given that the Framework already advocates high-quality design, scale and density within other policies.

120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? *Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The inclusion of a requirement to retain at least 50% of the non-developed area provides some safeguards (as does the intent to ensure buildings do not occupy more than twice the footprint of the existing building on the site). However the danger of including specific sizing requirements in policy is that it is interpreted as a figure ‘to be achieved’ by the applicant. It may also facilitate proposals that, on a case-by-case basis, are unsuitable for the plot.

121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? *Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

a) If not, please explain how guidance could be clearer?

The policy is worded to promote an increase in density, which, in principle, is acceptable. However it is critical (from a place making perspective) that it is done sensitively. It is welcome that L3.2 talks about the importance of the character of the settlement, and we believe that this should be emphasised. Higher densities should always be secured where they can be accommodated.

122) Do you agree with the minimum density requirements set out within policy L3? *Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The density requirements are rightly aspirational. In many areas of our district these figures may only be appropriate when delivered as apartments (as opposed to dwellings). Whilst we recognise that increased development density can help address housing delivery issues, we still believe that it should be for the Local Plan to stipulate density requirements.

b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence.

We have no evidence to share, but this issue highlights the importance of assessing these issues at a local level as opposed to being nationally mandated.

123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of ‘net developable area’ within the NPPF suitable for this policy? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We agree the dwellings per hectare is the metric to use and would agree that net developable area is a suitable metric also.

124) Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well-connected’ station? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons and preferred alternatives.

We understand the use of railway stations as indicators of sustainability, but there are other determinants that influence whether a settlement should accommodate higher densities of development, i.e. distance to bus stops, towns and villages, schools. These matters, which often require assessment on an individual locational basis, are best retained at the local level.

125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? *Yes/No*

a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?

No comments to make.

126) Should we define a specific range of residential densities for land around stations classified as ‘well-connected’?

We consider that this should be determined at the local level and be included in Local Plan policies. If the policies are not sufficiently ambitious, then the evidence base can be challenged at Examination. This is the type of local assessment that is necessary.

127) If so, what should that range be, and which locations should it apply to?

No comments to make.

128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

129) Please provide your reasons, particularly if you disagree.

It depends how receptive Inspectors are to the continued inclusion of criteria-based policies within Local Plans. These policies provide the necessary design advice for residential extensions. If it is the intention that Policy L4 (and national design and place-making guidance) replaces local policies, then we would disagree.

130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

131) Please provide your reasons, particularly if you disagree.

No additional comments to make.

132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land? *Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The policy fails to provide guidance for those locations where a spatial development strategy has yet to be prepared. It is not clear where, in the absence of this strategy, strategic guidance will be provided and how this should be assessed in the interim.

We are also concerned by the amended wording contained in Annex E in relation to the identification of Grey Belt land. This has seen the removal of footnote 7 considerations from the definition. The current inclusion of footnote 7 would have seen these areas potentially excluded from what could be considered Grey Belt where they provided a strong reason for refusing or restricting development. Removal of these from the definition will potentially lead to more areas being lost to development without a proper assessment of the potential impact of this.

133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? *Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Whilst supporting the principle of directing development to accessible public transport hubs such as train stations, we wish to note that this should not be at the expense of the protection of the Green Belt. Such areas may still perform strongly against the five purposes for designation, with the loss of such land risking undermining the overall extent of the Green Belt. The impact on the Green Belt should still be taken into account when assessing proposals in such locations.

134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

135) Please provide your reasons, particularly if you disagree.

We support the intentions of this policy and would support the delivery of the measures referenced. The extent to which the Local Plan can achieve all of these is, however, questionable especially where land is within private ownership and may not be available to deliver the benefits suggested.

136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

GB6 refers to the tests included at GB7. Not all of the tests in GB7 are sufficiently clear (e.g. what constitutes “*limited*”?). But we are pleased to see the inclusion of renewable and low

carbon energy development as one of the development types where “*very special circumstances*” might warrant an approval.

- 137) Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? Strongly agree, *partly agree*, neither agree nor disagree, partly disagree, strongly disagree.**

GB7.1h caters for new housing provision on Green Belt. The policy suggests that this would not be inappropriate where it is near a well-connected station. We would suggest that this requires assessment as part of the Local Plan process as opposed to be included within policy. The density requirements associated with L3 are (understandably) ambitious but we believe are best addressed via local plan examination.

- 138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.**

The alignment between the planning policy for traveller sites and the Framework ensures that there is sufficient clarity and consistency.

- 139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

- a) Please provide your reasons, particularly if you disagree.**

Development on green belt land should incorporate the highest level of benefits and affordable home delivery is at the forefront. Many development sites are multi-phase, and therefore part 3b could in effect apply to most sites. Is this the intent of the policy?

The wording should not be used to marginalise the Local Plan viability assessment.

- 140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?**

Yes. In order to highlight that viability assessments should be the exception as opposed to the rule, it may help developers and local authorities -to have some typical benchmark values.

- 141) Do you agree with setting an affordable housing ‘floor’ for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out? Strongly agree, *partly agree*, neither agree nor disagree, partly disagree, strongly disagree.**

The overall intention is to be supported especially if it means that a greater quantum of social rented housing comes forward. We would say however that a 10-15% requirement would need to be tested as part of the Local Plan process and therefore discretion is needed with respect to this.

- 142) Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?

No further comments to make.

- 143) Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please explain your answer.

This provides a robust and standardised national benchmark and allows developers and decision makers to make informed decisions.

- 144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?

It is a standardised approach especially for greenfield land and agricultural land.

- 145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Planning judgement still needs to be exercised, however the change does at least provide additional clarity with respect to what constitutes Grey Belt.

- 146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Further clarity is needed via the Planning Practice Guidance. It is welcome that the DP1 (c) provides for policies around design which can respond to local issues. This is critically important to retain to ensure that local areas can respond to local need.

- 147) Do you agree with the approach to design tools set out in policy DP2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We welcome the move away from the legal requirement for authority-wide design codes, however, further guidance would be beneficial through Planning Practice Guidance to provide more clarity; for example, to help *interpret 'where design guides, design codes and masterplans are necessary'*.

It should be made clear in DP2 (a) that the '*character of the site or area*' refers to the natural as well as the built environment. It is very welcome that DP2 (b) outlines the need

to respond to local context and be underpinned by community engagement. Emphasis should be placed on the need to also engage with children, youth and young adults. Further guidance would be useful. Engagement audience should include engagement with children, youths and young adults who are generally underrepresented in planning engagement. It would also be beneficial for design guides, design codes and masterplans to be reflective of existing strategies, for example Green and Blue Infrastructure Strategies and Local Nature Recovery Strategies.

148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? *Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Design reviews are a valued resource, especially when they involve complex, strategic developments. However we still believe that local pre-application advice is the best method for assessing the acceptability of development proposals.

Some specific observations which inform the creation of well-designed places:

- Policy DP3 (1) (d) the design of a new development - should be led and shaped by nature. Green and blue infrastructure should not be an afterthought in the design process. For example, to be effective, sustainable urban drainage systems need to be an integral and early part of the design process to ensure the layout, design of green and blue space and the design of development take every opportunity to reuse, infiltrate and attenuate water. In addition to incorporating (new) and connecting to a (existing) network, how the design of a development can enhance existing green and blue infrastructure should be explored. Wherever possible, the aim should be to connect to the existing green and blue infrastructure network. The ongoing management and maintenance of green and blue infrastructure is also a key element of the design of a development.
- Policy DP3 (1) (d) must include reference to soils and improving soil quality (along with air and water quality). Soils must be protected and enhanced in order to deliver on the aims of (a), (b), (c), (d), (g) and (h). Development on agricultural land should be expected in particular to protect soils and to deliver areas for food growing such as orchards, community gardens and allotments.
- Policy DP3 (3) (d) should include wider design considerations for mitigation and adaptation including protection from extreme weather, fire and a focus on healthy buildings. This could include form factor, resilient low carbon, external shading, roof design (for low carbon energy, green roofs, shading and fire resilience), internal layouts, design for storms, increasing thermal mass and controlled ventilation with single vent points (such as mechanical ventilation heat recovery).
- Policy DP3 (1) (g) Public space which says that "*To respond to their context and create well-designed places development proposals should...(part g) include spaces that are safe, secure, inclusive, accessible for all ages and abilities and which facilitate and encourage social interaction, play and healthy lifestyles...*" We

consider that this section (and the wider NPPF) should specifically make reference to women, girls, gendered safety and designing out violence against women in the built environment. It is imperative that women and girls feel safe when interacting with the built environment through consideration of measures such as well-lit streets (which can still be ecologically and dark skies friendly), accessible public transport, well considered street layouts which will encourage more women and girls to use walking and cycling as an alternative to the private car, thereby also having a benefit on reducing levels of pollution. Omission of any reference to this issue in the NPPF is significant, given the levels of new development that the NPPF will facilitate. Exclusion of any reference would also be contrary to the recently published government strategies such as the 'Violence against women and girls' (VAWG) strategy.

149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If not, what else would help secure better design and placemaking outcomes?

No additional comments to make.

150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Yes. It is encouraging to see reference to public transport operators and land promoters within the groups identified for early engagement regarding sustainable transport at the plan-making stage.

The policy could however be stronger in favour of sustainable transport. It could do this by amending the start of Policy TR1: (1a) to read "*Making sustainable transport considerations **part a priority** of early engagement with local communities...*". This policy must make it clear that new development should explore all opportunities for sustainable transport.

151) Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We have no objection to the setting of parking standards in development plans (as opposed to making these an optional inclusion). The greater flexibility in TR2 is also welcome, particularly placing greater emphasis on the local assessment of a site's connectivity.

It is important to ensure sufficient space for electric vehicles and parking spaces for other groups such as blue badge holders, and we are encouraged to see reference to this in the policy. Similarly, reference to 'wheeling' (for the first time in the Framework) is also welcome.

152) Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The change in wording; i.e. expanding on the previous, vague reference to “*significant development*” is a considerable improvement and will help clarify the type of impacts that local planning and highway authorities should be concerned with.

We believe that the Department for Transport Connectivity Tool has the potential to be a significant informant of what is a sustainable/unsustainable location. We would advocate greater training in the use of the Connectivity Tool, not just for officers but for Elected Members and other built environment professionals.

153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

It is encouraging to see TR4 (1a) indicate that there should be “*priority first to pedestrian and cycle movements*”, and that maximising the opportunities for high quality public transport is also to the fore.

We agree with the reference to prioritisation facilities, such as segregated cycle lanes, and to the principle of reducing the scope for conflict between modal types.

In our experience, “unnecessary street clutter” is often caused by the siting and scale of highway signage, which can be insensitive to its surroundings, particularly in conservation areas.

We would suggest amending TR4 (1d) to add that the delivery of goods should not just aim to “not compromise” key place-making principles but also should seek to maintain unobstructed access for all modes of transport.

154) Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need? *Strongly agree, partly agree, **neither agree nor disagree**, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We have no comments to make on this question.

155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network? *Strongly agree, **partly agree**, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Yes; some clarity at TR6 (3) regarding the term “severe adverse impact” is welcomed but considering how the issue of severity is a considerable cause of disagreement during planning appeals (typically public inquiries), we wonder if this should be more explicitly defined.

We consider that there is an opportunity to provide criteria for when a Transport Statement or a Transport Assessment should be required (i.e. to provide national consistency). This could be reflected in Annex C of the Framework.

156) Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We have no additional comments to make.

157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The scenarios presented in the policy for opportunities to improve the quality of existing routes are logical.

158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Welcome the inclusion of definitions for community facilities and public service infrastructure, to highlight their importance. It is good to see the need for engagement with relevant service providers set out in national planning policy. Previously within our district, in some cases, this has been received with mixed response. It is also good to note the request to set out the facilities and contributions that are expected from development referenced in this section. However, it would be beneficial to include more emphasis on the protection of existing services and infrastructure. We strongly agree with the expectation for the development plan to set local standards for different types of recreational land. Whilst national standards are a useful starting point, there is not a one size fits all approach, because different areas have different needs and so this needs to be reflected in local standards to deliver the bespoke spaces each area needs.

The ability to set local standards and allocate land for green space and outdoor recreational lands should also include reasons around climate adaptation and to provide climate shelters.

159) Do you agree that Local Green Space should be ‘close’ to the community it serves? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The previous wording ‘*reasonably close*’ was not particularly helpful and widely open to interpretation. Local Green Spaces are ‘*green areas of particular importance to the local community*’, and in order to be able to serve this local community as per point a) it must be close and therefore accessible to the local community in which it serves.

160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Yes, we think that this sufficiently bolsters support for new or improved community facilities.

161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term ‘fast food outlets’, and the types of uses to which it applies?

We support the inclusion of the word ‘reasonable’ relative to walking distance. Rather than the term ‘fast food outlets’, perhaps a better choice would be ‘hot food takeaways’ as that would align with the definition of types in the Use Classes Order.

162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

No additional comments to make.

163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of ‘and/or’ with reference to quantity and quality of replacement provision? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We agree that the policy seeks to protect open space provision, but we would add that the replacement provision should still be of a better standard of provision, and most importantly, be relevant to what the local area requires (i.e. is deficient in).

164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The provision to exclude Local Green Space designations from falling within the Grey Belt or areas of previously-developed land is logical and is supported.

165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

P1 (1) should explicitly mention climate. P1 (b) (i) should explicitly mention soil.

Agree that future impacts need consideration at the allocation stage and we are pleased to see that the NPPF picks this up.

166) Are any additional tools or guidance needed to enable better decision-making on contaminated land?

None.

167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The criteria appear to be robust and it is similar to the amenity-based policies that have previously been included in our Local Plan.

168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We consider that P4 should be more explicit about the Agent of Change principle and the presumption that the continuation of existing activities within a locality will not be compromised by nearby new development.

169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

This appears to be a comprehensive list, and we have no additional comments to make.

170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

Yes, but not at the expense of the other policies contained within the Framework.

171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We support the increased clarity provided by Policy F3 in relation to this important issue.

172) Do you agree with the proposed clarifications to the sequential test set out in policy F5? Strongly agree, *partly agree*, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

The changes to the sequential test are equally useful for developers and LPAs. We note that the aim is still to steer development to the lowest flood risk. We would query why the policy is silent on the impact of groundwater, and we would welcome clarification on this matter.

173) Do you agree with the proposed approach to the exception test set out in policy F6? Strongly agree, *partly agree*, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree

No additional comments to make.

174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? *Strongly agree*, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

The policy adds the new requirement that Sustainable Urban Drainage Systems should be designed in accordance with the National Standards, which we fully support.

Multifunctional benefits should be a cornerstone of delivery of SuDS. Climate adaptation should be explicitly mentioned as SuDS can support and facilitate cooling as well as water management. Soils should be referenced in this policy. Soils across the development site should be protected as much as possible from compaction during development. Soils in areas which will not be sealed including areas where SuDS will be installed should be protected from damage so as to continue to retain their role in the hydrological cycle.

175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels? *Strongly agree*, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

We fully support the de-culverting and rewilding of river channels wherever possible.

176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? *Strongly agree*, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

The policy seeks to build on the Flood Risk and Coastal Change Planning Practice Guidance and by aligning the Framework and the PPG this removes any conflict or ambiguity when making decisions.

- 177) **The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?**

This is a welcome addition and adds further weight to the threats posed by our changing climate. As worded, we are confident that this will ensure that only appropriate development will be permitted. The change aligns with the *Flood Risk and Coastal Change Planning Practice Guidance*. Its inclusion within the Framework will assist decision makers.

- 178) **Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? *Strongly agree*, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**
- a) **Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.**

No additional comments to make.

- 179) **Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? *Strongly agree*, *partly agree*, neither agree nor disagree, partly disagree, strongly disagree.**
- a) **Please provide your reasons, particularly if you disagree.**

We would like to offer additional observations regarding the various policy components.

N1,1a. hierarchy of sites: strongly agree. It continues the long-standing policy of site hierarchy but does not restrict it to the formally designated sites which typically form a subset of the overall local areas of value for biodiversity.

N1, 1b. opportunities: strongly agree. The Local Nature Recovery Strategy (LNRS) makes a valuable contribution to this, although additional strategies and management plans also have an important role, especially for landscape scale.

N1, 1c. steers location of development to land of least environmental value where consistent with policies: partly agree. The approach is broadly good, but there is caution about the term “*where that would be consistent with other policies in this Framework*”. With the planning balance strongly tilted to allow development unless there is a significant overriding reason, it will be difficult in practice for planning authorities to steer development away from areas of environmental value that do not have a formal designation for conservation.

LNRS identifies opportunities to integrate development and environmental restoration. Where the opportunities are not integrated into a development there is an opportunity cost to future nature recovery. In some cases there will be other land that could be identified for future alternative opportunities when those originally identified are lost. In other cases the opportunity cost would be significant and not readily replaceable by other alternatives, and

in such cases there should be the option to preclude the allocation for land for development. For example, creating a 'pinch-point' development might limit a landscape-scale opportunity for future wetland restoration/flood relief scheme. It might lose the opportunity to create habitat that would also enable recreational access to a new or improvement green network/suitable alternative natural greenspace area, although N1, 1d may help with this.

N1, 1d Strongly agree. The role, importance and multiple benefits that both green and blue spaces can provide needs to be emphasised and considered in all development proposals. Standards should be set for green infrastructure, and these should complement and/or incorporate standards for open space and recreation. As such spaces are multifunctional. Requirement needs to be set through national policy, with a national starting point that can then be tailored to local needs through the setting of local standards.

There is a risk that the policy might be interpreted as meaning that only established trees and hedgerows that are specifically identified as beings of visual, historic or nature conservation value should be retained. Those trees and hedges considered to be of importance at site scale (e.g. mature trees that are not significantly visible outside the site and not currently identified as a bat roost) would not necessarily be valued for retention. N3 deals with long-term maintenance, which is a welcome inclusion, but only covers trees that have been retained.

180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

It would be reasonable to seek more than 10% biodiversity net gain:

- Where bespoke compensation is required for losses of irreplaceable habitat. Compensation for unavoidable losses of irreplaceable habitat is taken out of calculation of BNG and is considered separately, rather than as contributing to any gain from a development. Assuming no change in this position, the rest of the losses on site could be addressed by the usual 10% gain.
- Where development impacts on strategic green corridors of other local green and blue infrastructure, because reduction or loss of those cannot usually be replaced by habitat compensation in areas remote from the development. This interacts significantly with local Open Space needs especially if there is an existing deficit in accessible natural green space in the area.
- On large scale or phased developments where it is likely that the site will be cut into separate units below the mandatory BNG threshold.

It should be noted that the impact of Policy PM13 on this proposed policy of the Framework is not clear as it lays out that quantitative standards should be limited to a narrow range of areas which do not include BNG.

181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

The approach in policy N2 1. is broadly supported. Developments should aim to meet all of the policy criteria in N2, 1. a to g. To emphasise the importance of this, the following wording could be added to the end of the opening sentence of N1 'should from the outset', to indicate that these considerations should be factored in from the very start.

N2 (1) (a) and (d) must include reference to soils. This is for their social, cultural, environmental and climate value and the critical role they play in ensuring landscaping survival. N2 (1) must explicitly reference the protection and enhancement of soils on all development sites. This should also require soil baseline assessments, soil management plans, avoidance of loss of soils to landfill, and opportunities for reuse of soils on site.

N2 (1) (b) should be accompanied by guidance which sets out how this should be assessed and how at the local level protection of agricultural land supports national land use goals including that for food security. This policy should also include when development is on agricultural land how the non-renewable resource of agricultural soils will be protected as much as possible from sealing, and protected and enhanced for local growing within the development site.

N2, 1 f. is welcomed, although such measures also need habitat nearby that can be used by swifts, bats and hedgehogs, all of which are dependent on diverse and abundant invertebrate populations.

N2 2. provides an important last resort to refuse development if there is significant harm that cannot be resolved. In accordance with best practice significant harm should include indirect or off-site harm as well as direct on-site losses.

An example of indirect harm would be housing development adjacent to heathland with a rare reptile population, or rare ground-nesting birds, where the site would be within an easy predation zone for domestic cats and/or there would be recreational disturbance from increased public access. No on-site compensation could be achieved, and effective offsite compensation would only be possible if there were alternative areas where habitat enhancement could bolster another relatively local population sufficiently to compensate for the reduction or loss related to development - and that may not be the case with rare or threatened species.

N2 should place more emphasis on blue infrastructure.

There is no question related to N3. N3 should also reference the air quality and social equity.

182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

a) Please provide your reasons, including how policy can be improved to ensure compliance.

In N4, 2. setting out the requirements for assessment of major development in Protected Landscapes is useful. There will be the difficulty of deciding how to weigh factors of development cost and economic benefit against attributes that cannot be monetarised in the same way: conservation and enhancing natural beauty and wildlife and cultural heritage.

As Protected Landscapes are national assets not just local ones, assessment of economic benefits should also focus on the economy nationally, rather than the economic benefit case just being satisfied by a benefit to the local economy.

Note that many Protected Landscapes also have significant importance for conserving and enhancing wildlife (e.g. Arnside and Silverdale), not just the National Parks and the Broads.

183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system? Strongly agree, partly agree, neither agree nor disagree, *partly disagree*, strongly disagree.

a) Please provide your reasons, particularly if you disagree.

Policy N6 does provide a hierarchy of sites with the sites of highest importance given the greatest protection. As written, the level of protection has been downgraded at all three scales. There is no reference to the mitigation hierarchy and protection for sites rests solely on Policy N2, 2.

N6, 1aii would only provide an adequate degree of compensation if an Environmental Delivery Plan is supported by robust evidence that the type of impact can be adequately compensated for the sites and features affected – and compensation can be delivered in a relatively short timescale. This means that EDPs would only be of value for a very limited number of landscape-scale impacts such as nutrient neutrality. Broadening EDPs to complex habitats of high value and to species where there is insufficient evidence about effects and the effectiveness of compensation would lead to reductions of biodiversity, some of which may be irrecoverable.

N6, 1bii reduces the existing protection for SSSIs. The text should be “*should be refused unless;*” rather than “*should only be supported if;*”.

The test of “clearly outweighs” is unclear and the text omits any reference to N2, 2. A developer should not be eligible to apply for an Environmental Delivery Plan unless the preceding steps to avoid, minimise and mitigate have already been undertaken.

184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?

There are significant concerns about the criteria for Environmental Delivery Plans, the evidence to support their efficacy, the time to deliver any compensation, and the resources for this, especially the capacity within Natural England.

A specific issue in this district (and others) is that of recreational disturbance on the bird populations of the coastal SPA. We consider that the best method to address this is via the system of payments that have already been put in place in some areas to provide mitigation and compensation in the local area and with funding coordinated by the local authorities, with Natural England as a participating stakeholder. Examples include schemes for SPAs at the Solent, the Essex estuaries and the Humber.

It is likely that a similar scheme will need to be put in place for Morecambe Bay and Duddon Estuary SPA, after completion of the current user surveys that have been commissioned jointly by three local councils to inform the need for mitigation. We think the existing model would be more appropriate here than an Environmental Delivery Plan, particularly for ensuring that the actions delivered are local and appropriate, which is not the case with Environmental Delivery Plans – Natural England would not be obliged to provide any compensatory measure in the local area.

Natural England has informed us that they are not able to deal with planning consultations routinely and is placing more responsibility on the local planning authorities, in order to focus on only the largest developments, NSIPs and significant impacts on SSSIs. We consider that Natural England could not resource the operation of any scheme to address the current and future recreational impacts on the SPA. It would be on a much greater scale than current District Level Licensing.

185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons.

These are significant designations and for them not to have the same statutory protection in planning as listed buildings and conservation areas appears to reduce their importance, making them only a material consideration. We particularly welcome that this would include the setting of such assets. The NPPF could also confirm that the S72 duties include consideration of setting in relation to character and appearance of a conservation area.

At the moment, The Gardens Trust must be consulted by LPAs before they grant planning permission for any development which will affect a Registered Park or Garden. Given the Government's proposal through its Reforms to the Statutory Consultee System, which could see The Gardens Trust losing their statutory consultee status, the need to extend the special regard duties to include Registered Parks and Gardens, in particular, has become even more pressing.

186) Do you have any evidence as to the impact of implementing the additional regard duties for development?

Mainly in relation to Registered Parks and Gardens. Several in our district are also within conservation areas, which has then taken precedence in planning terms. However, this does not apply in all cases, leaving those Registered Parks and Gardens at potentially greater risk. Also development can affect the setting of Scheduled Monuments within our district, and it is important that our archaeological colleagues are able to assess the impact.

187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We support the inclusion of heritage assessment as part of the plan making process.

While we are pleased to see the promotion of local lists to identify non-designated heritage assets, the multiplicity of Non-Designated Heritage Assets (NDHAs) needs to be addressed. “Local lists” can include a wide range of unlisted historic assets and imply there are several different grades of undesignated historic buildings. We consider that local lists should simply incorporate all NDHAs within a parish and district, including all those which positively contribute to the character and appearance of a conservation area. Local lists should not just include selected historic buildings, implying a different grade or higher status for these building in comparison to other NDHAs. This simply results in greater complexity to the criteria used for identification of NDHAs and in the implementation of associated policy. It also makes the system difficult for the public to understand.

It is positive to see more explicit guidance in relation to conservation areas and advice to review them periodically. Where a new conservation area or an amendment to an existing boundary is proposed then this should rightly be informed by a formal conservation area appraisal. However, there are exceptional situations where designations are needed at short notice and therefore it should not be a requirement that there should be an adopted conservation area appraisal on designation. A draft assessment of the character and appearance of the conservation area should be considered appropriate in these circumstances pending the production of a full conservation area appraisal. Likewise, a management plan should certainly be encouraged but should not be a requirement of designation.

188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

The inclusion of a spectrum of impacts from enhancement, through to not effect to harmful is supported as it clarifies that the assessment should also look at positive impacts not merely measure harm. However, it would be useful to acknowledge in 2b. that development can often cause a mix of enhancement and harm. It can be case that the enhancement and harm are evenly balanced resulting in a neutral outcome. On other occasions minor harm in one part of a scheme may be outweighed by significant enhancement elsewhere. The opposite also applies.

In relation to the content of heritage impact assessments, it is helpful for the national guidance to reflect the prescriptive guidance produced at a local level. Also, helpful to state that the decision makers need to be satisfied with the accuracy of those assessments. However, the accuracy of those assessments in relation to planning applications is a concern, as the vast majority of assessments are not impartial because they are paid for by the developer.

A standard format for heritage statements should be considered. These could be live documents, possibly in tabular form outlining the asset's significance, proposed works, and impact, to reduce the endless report writing and prose. A column for the local authority conservation officer comments could be included enabling them to more quickly respond to applications without having to write separate assessments. Although not something for inclusion within the NPPF, more guidance is needed to make these documents more useful.

We also consider more guidance is urgently needed to make the details, materials and specifications within an application easier to assess and for everyone to understand. Currently, information on the details of an application can be found in many parts of a planning or listed building consent application. For example, details can be found in the application form; within the Design and Access Statement; within the Heritage Statement; on the application plans and annotations; and within Schedules of work. Often these documents conflict with each other. Again, probably not for the NPPF but for supporting guidance to devise a system to simplify the process.

The IHBC and Historic England could assist in advising on these issues.

189) Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We note the change in wording to "substantial weight" from "great weight". While on the face of it this seems to be a semantic change for consistency with substantial weight used elsewhere in the NPPF, in the case of heritage this is underpinned by statutory force through the duties in s16, 66 and 72 of the 1990 Act. It is not clear if the use of the term elsewhere the draft also reflects statutory duties and, if not, it could be inferred that heritage protection is being downgraded or levelled down.

We are pleased to see that 'less than substantial harm' has been removed. This terminology always downplayed any harm which was not 'substantial' for which the Planning Practice Guidance set a high bar, in saying that it "is a high test, so it may not arise in many cases". While we can understand why energy efficiency and low carbon heating measures have been given a special mention, it is not clear what is meant by 'important public benefits'. Are we to assume that they should receive greater weight than other public benefits, and we may need to accept more harm to the heritage asset? Important public benefits might also include significant enhancement to the heritage asset. We also have doubts that energy efficiency and low carbon measures in a single building can be meaningfully defined as an "important" public benefit, especially if the impact is harmful in other respects and may, ultimately, lead to a loss of public support for such measures.

Rather than define these specific benefits in policy, with the proposed wording being unclear and confusing, it would be better to define these benefits in supporting guidance.

The change from 'optimum viable use' to 'long-term re-use' does offer more flexibility, but if a range of uses no longer needs to be considered, then there is a risk that the most profit-making, but the least sympathetic, use will simply be put forward. While we appreciate that development proposals would still need to comply with Policies HE4 & HE5 it might be worth

re-defining “optimum viable use” as “optimum long-term use” to take account of the need to minimise harm.

190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We are pleased to see the inclusion of more detailed requirements in all these policies, including HE7.

It is a very positive policy on conservation areas and includes helpful references to non-designated heritage assets. Especially noted the comment in HE9 which states that “the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole...” This seems to give a NDHA greater prominence in its own right, rather than simply assessing its contribution to the character and appearance of the conservation area.

Policy HE9 might include reference to the “setting” of conservation areas, to take account of development outside a conservation area that would affect its setting. An obvious example is a tall building.

The policy scope and wording of HE9 could equally be helpfully applied to Registered Parks and Gardens, which are also an area-based designation, to provide a firmer basis for consideration of impacts on these assets.

Policy HE11: Loss or Removal of Heritage Assets consolidates current Framework paragraphs 211, 217 and 218 to provide a cohesive approach where development would result in the loss or removal of heritage assets. It ensures assets are not lost unnecessarily and that, where removal occurs, they are recorded in the Historic Environment Record. The policy also retains the “retain and explain” approach for statues, plaques, memorials and monuments.

191) Do you have any other comments on the revisions to the heritage chapter?

Generally, we are pleased that this chapter acknowledges the positive role that heritage assets can play in sustainable development. The restructuring of the chapter with clear headings is welcomed, as is the greater clarity and detail. The new numbering system will also avoid constant re-numbering of policies where there are later amendments.

192) Do you agree with the transitional arrangements approach to decision-making?

*Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We are unsure why development plan policies should be afforded “*very little weight*” where inconsistency arises. If the policies within the NPPF were statutory, then this approach would be far more logical.

193) Do you have any further thoughts on the policies outlined in this consultation?

No further comments to make.

194) Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation? *Strongly agree, partly agree, neither agree nor disagree, **partly disagree**, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

On the whole, the list of WMS set out in Annex A is comprehensive, and we agree that a list is necessary to avoid confusion.

We are concerned about the inclusion of Planning – Local Energy Efficiency Standards Update as a document that is superseded, and we believe that this is premature without a comprehensive, cross-regulatory sector approach to the setting of local standards. In short, if a local planning authority considers that there is scope and viability headroom to insist on increased energy efficiency standards in their district and are able to evidence this]during plan-making, then there should still be scope to do so.

195) Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree**.*

a) Please give reasons.

Consenting data centres under the NSIP regime has a strong potential to disrupt development including the delivery of new, high-quality housing in the UK. Due to tight grid constraints across the country, housing and other development can often be limited constraints on local electrical infrastructure. Developments such as data centres, which carry a high energy requirement and therefore take up a high quantum of local grid capacity, can cause knock-on impacts to the viability of housebuilding due to grid upgrade costs.

Development involving data centres should be consented by local planning authorities (i.e. not using the NSIP regime) or, if the NSIP regime is to be used, there should be a strong requirement to work closely with the local planning authority to anticipate any disturbance to the local grid and to avoid any negative impacts to allocated development sites.

Without these measures in place a data centre could undermine site allocations within a development plan and thus result in slower housing delivery and a loss of a 5-year-housing-supply. This effect is not limited to housing development either and is a risk for all development types which require grid connections. It is therefore vital that this issue is addressed and that data centres come forward in a way which works with the local planning system and which minimises negative impacts.

Streamlining the process for delivery of data centres should not occur at the expense of the local area. Any application must mitigate and avoiding social, cultural, landscape, soil, biodiversity, habitat, environmental and climate loss and damage.

The following should be added to the consenting process for large-scale datacentres to ensure the impacts of delivery are reduced as much as is possible:

- Any combustion based co-located energy infrastructure (e.g. CHP) should be explicitly excluded.
- Provide for improvements to the electric network which increases overall headroom to ensure surrounding area is not sterilised for development.
- The development must be required to complete a full lifecycle carbon assessment including Scope 3 emissions. This must include the development's lifetime impact on the LPAs territorial emissions profile. A carbon management plan must be provided and any residual Scope 1 and Scope 2 emissions from the development should be expected to inset them within the local authority or worst case offset with a credible national offsetting scheme within the UK.
- Data centres' economically productive lifespan is quite short. As such planning applications for datacentres and their associated infrastructure including co-located energy infrastructure should be accompanied by a decommissioning plan.
- Where any water-based cooling systems are proposed, a full catchment-based water availability assessment must be provided and approved by the local water regulatory body
- Provision must be made for the use of waste heat produced from the datacentre to provide heating for nearby residential and business use. Data centres should be co-located with heat networks where possible, and where no heat network exists, they should be required to be designed for heat network readiness, or one should be created and made available for nearby connections
- A local benefit scheme must be delivered which includes direct substantial social, cultural, economic and environmental benefits to the local area. This could include community shares, local annual benefit fund, Energy Local Clubs, creation/improvement of public open space, delivery of PROW, cycleways and bridleways, etc.

196) Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? *Yes/No*

a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.

For the reasons outlined in Q.195 we would support proposals that ensured that the local authority remained the decision maker for applications relating to data centres. We recognise the issues associated with two consenting schemes and believes that increasing the energy generation thresholds would help reduce this issue while ensuring that local authorities retained their decision-making powers.

197) Do you have any views on how we should define 'co-located energy infrastructure'? Please provide your reasons.

Where it is not possible to deliver the energy infrastructure within or adjacent to the site, the energy infrastructure should be within the same primary substation area. Locating within the primary substation area, as opposed to within the data centre site boundary, can also introduce wider benefits for example by reducing landscape impact, increasing the catchments for community benefits and supporting wider rural income diversification.

198) Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres? Yes/No

a) Please provide your reasons.

We do not have a preference regarding the thresholds.

199) What benefits or risks do you foresee from making this change? Please provide your reasons.

Not applicable.

200) Would you support the use of growth testing for strategic, multi-phase schemes? Strongly agree, partly agree, neither agree nor disagree, **partly disagree, strongly disagree.**

201) Would you support the optional use of growth testing for regeneration schemes? Strongly agree, partly agree, neither agree nor disagree, **partly disagree, strongly disagree.**

202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty? Strongly agree, partly agree, neither agree nor disagree, **partly disagree, strongly disagree.**

a) Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market-led development.

We accept that 17.5% is a good reflection of industry for market led schemes.

203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?

a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.

It is clear that greenfield sites with little in the way of abnormal costs will appeal to the market. The scenario set out in (a) above would make viability testing more transparent and potentially quicker.

204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?

a) Please explain your answer.

The overriding message should be that viability testing later in the process should be the exception, rather than the rule.

205) Existing Viability Planning Practice Guidance refers to developer return in terms of a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

No comments to make.

206) Do you agree there are circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy? Strongly agree, partly agree, *neither agree nor disagree*, partly disagree, strongly disagree.

a) Please explain your answer.

The complexity of this issue requires further exploration by Government.

207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

a) Please explain your answer.

No comments to make.

208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? *Strongly agree*, partly agree, *neither agree nor disagree*, partly disagree, strongly disagree.

a) In what circumstances might a premium, or the usual premium, not be required?

In respect of the delivery of affordable housing.

b) What impact (if any) would you foresee if this change were made?

Removing premiums can only assist with facilitating faster development.

209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? *Strongly agree*, partly agree, *neither agree nor disagree*, partly disagree, strongly disagree.

a) Please explain your answer.

Every site is different and faces constraints and challenges. An extant consent might be incapable of being implemented, so the existence of a permission should not be proof of alternative use value.

210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? *Decision maker discretion/ Another metric / Neither*

a) If another metric, please set out your preferred approach and rationale.

No comments to make.

211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?

This can be avoided simply by clarity of national policy wording. Be unequivocal in stating that schemes have to be policy compliant.

212) Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context. *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please explain your answer.

No additional comments to make.

213) Do you agree that a 2.5 hectare threshold is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

We only partly agree because clarification is required as to whether the figure represents net or gross developable area.

214) Do you agree that a unit threshold of between 10 and 49 units is appropriate? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, particularly if you disagree.

No comments to make.

215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development? *Yes/No.*

216) If so, please explain your answer and provide views on potential mitigations.

Sites may come forward in smaller, piecemeal amounts to fall within the threshold requirements.

217) Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?

a) Please provide your reasons.

The Building Safety Levy has still yet to be formally introduced after being delayed for a year. It should be implemented first and exemptions should then be considered following its introduction. We see no reason for the exemption.

218) If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?

a) Please provide your reasons.

It would in our experience depend on whether studios or apartments are proposed. We would argue a development of 120 purpose-built studios is quite different to a scheme which includes shared accommodation in the form of Houses in Multiple Occupation. The critical question is why should they be exempt in the first place?

219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.

Whichever option represents a simpler administrative solution.

220) If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.

No comments to make.

221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.

As per Q.216, the risk of smaller sites coming forward in piecemeal fashion to circumvent the levy.

222) Do you agree with the proposal to extend the Permission in Principle application route to medium development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, **strongly disagree.***

a) Please provide your reasons, particularly if you disagree.

The PIP route is overly simplistic, and the outline planning consent route is more suitable for assessing new housing, in particular medium-sized developments.

223) Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?

A short planning statement can be useful for LPAs and can also seek to advance the applicant's case. We find that applicants often choose to submit a covering planning statement irrespective of whether they are required to.

224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?

a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

We have no comments to make.

225) Is there anything that could be done to mitigate any impact identified?

We have no comments to make.

Planning Policy Cabinet Advisory Group— 17th February 2026

Item 2: Authority Monitoring Report (AMR) Update

1.0 Introduction

- 1.1 Officers are nearing completion of the 2025 Authority Monitoring Report (AMR) for the monitoring period 1 April 2024 to 31 March 2025. The AMR provides the statutory monitoring framework for the district, assessing the implementation and effectiveness of adopted planning policies through a range of social, economic and environmental indicators. It also reviews the existing evidence base to support the preparation of future planning policies and provides an update on progress in the preparation of forthcoming planning documents.

2.0 Important Changes to the 2024/25 AMR

- 2.1 In January 2025, the Local Plan Climate Emergency Review was adopted. This was the main local policy development during the reported monitoring period. As a result, additional monitoring indicators arising from the newly adopted Plan have been incorporated into the AMR to ensure that the monitoring framework remains robust and fully aligned with the most up-to-date Development Plan Document (DPD).
- 2.2 The previous iteration of the AMR reported on progress against the Local Development Scheme (LDS). This set out the timetable for the preparation of planning policy documents including key milestones, anticipated resources, and identified risks to delivery. Since the last monitoring period, Government reform introduced through the Levelling-Up and Regeneration Act 2023 has removed the statutory requirement for local planning authorities to prepare and maintain a LDS. This has been replaced by a requirement to prepare and keep under review a Local Plan Timetable. The AMR has been updated accordingly to reflect this change in national policy, while continuing to report on key planning documents and processes.

3.0 Key Characteristics of the District

- 3.1 The AMR begins with a high-level spatial portrait of the district, setting out the key social, economic and environmental characteristics that define the planning context. It brings together headline information on the district's geography and

settlement pattern, accessibility, natural environment, built heritage, and social and economic conditions.

3.2 This section of the AMR establishes the baseline against which planning policies are monitored and assessed and provides the contextual framework for understanding development trends, opportunities and constraints across the district.

3.3 It then moves on to reporting on the five Strategic Objectives (SO). These are:

SO1 Delivery of a thriving local economy that fosters investment and growth and supports the opportunities to deliver the economic potential of the district.

SO2 Provision of a sufficient supply, quality and mix of housing to meet the changing needs of the population and support growth and investment.

SO3 Protect and enhance the natural, historic and built environment of the district

SO4 The provision of necessary infrastructure required to support both new and existing development and the creation of sustainable communities.

SO5 Delivery of a safe and sustainable transport network that improves both connection within and out of the district, reducing the need to travel and encouraging more sustainable forms of transport.

4.0 **SO1 Headlines**

4.1 Within the 2024/25 monitoring period, there was a reduction in planning applications for employment floorspace (whether for 'creation' or 'loss of'), from 19 applications in the 2023/24 monitoring period, to 12 in this monitoring period. These lower levels of planning application activity are consistent with wider national trends.

4.2 Approvals for employment-related development fell by 50% in 2024/25, with limited consents for large-scale new floorspace. Approved schemes would deliver 3,193 sqm of new employment space, while losses reduced slightly to 483 sqm. None of this recorded loss would be within allocated employment areas.

4.3 The 2025 Employment Land Review highlighted that while the overall supply of employment land is sufficient, the deliverability and geographic distribution of sites require review.

4.4 The Council has received the Town Centre Health Check Report as part of the Retail and Commercial Leisure Study. The report assesses the vitality and viability of Lancaster, Morecambe and Carnforth using Planning Practice Guidance key performance indicators. Vacancy rates vary across the district's main centres, with Lancaster recording 70 vacant units (13.3%), Morecambe 83 vacant units (25.6%), and Carnforth 16 vacant units (19.3%), compared to a UK average vacancy rate of 14.1%.

5.0 SO2 Headlines

- 5.1 Due to the December 2024 NPPF amendments, the district saw an increase in the local housing need figure from 485 in 2023/24 to 627 in 2024/25.
- 5.2 Housing completions decreased slightly from the last monitoring period, falling from 214 dwellings in 2023/24 (including 57 student and other residential institution units) to 196 dwellings in 2024/25, of which 12 were student units.
- 5.3 Of the 196 completions recorded during the monitoring period, 81 dwellings were affordable housing, representing 41% of total completions.
- 5.4 Housing delivery during the period was primarily concentrated within the Carnforth sub-area, with the ongoing development at Scotland Road, Carnforth accounting for all completions in this location. Completions were also recorded in a small number of villages, including Halton, Over Kellet and Dolphinholme.

6.0 SO3 Headlines

- 6.1 As in previous monitoring reports areas of biodiversity importance are monitored by the Council. Areas of biodiversity importance are defined as Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPAs), Regionally Important Geological/Geomorphological Sites (RIGS), Ramsar Sites, Biological Heritage Sites (BHS) and Areas of Outstanding Natural Beauty (AONB).
- 6.2 A new monitoring indicator introduced through the Climate Emergency Review records approvals for energy efficiency, climate mitigation and adaptation retrofit schemes to existing dwellings. Approvals for the 2024/25 monitoring period are set out in Table 1 below.

Energy Efficiency Measure	Number of approvals
Solar	38
Heat Pump	30
Insulation	4

(Table 1: The number of approvals for solar, heat pumps and insulation for 2024/25)

6.3 Heritage assets are also closely monitored. There are 3338 Local Heritage Assets recorded across the district. As of the 2024/25 monitoring period, 11 listed buildings within the district are on the national 'Heritage at Risk' register produced by Historic England.

7.0 SO4 Headlines

7.1 Throughout the last monitoring period, the Council has continued to approve schemes for new development. These schemes have sought to meet the districts needs for new housing, employment and retail as well as ensure that the green/blue infrastructure required by communities is also protected and new areas created.

7.2 To support the delivery of new development, the necessary supporting infrastructure is identified through the Local Plan process. As part of the New Local Plan, these requirements will be set out in an Infrastructure Delivery Plan (IDP) and Infrastructure Delivery Schedule (IDS), which will identify the infrastructure required to support sustainable development, along with indicative costs, delivery timescales and the bodies responsible for delivery.

7.3 As part of the plan making process, the council will also undertake a Viability Study for the Local Plan Review. The role of Viability Assessment will be a critical component of the Local Plan process to ensure its expectations can realistically deliver viable development.

7.4 Infrastructure Funding Statements are also being prepared and reported for the 2024/25 monitoring period. The Infrastructure Funding Statements provide a summary of all developer contributions relating to Section 106 Agreements for the last financial year.

8.0 SO5 Headlines

8.1 The district continues to benefit from strong transport connectivity across a range of modes. Rail accessibility is particularly good, with seven railway stations providing both internal and external connectivity. Network Rail has continued improvements to Lancaster Railway Station.

8.2 Bus passenger numbers totalled 36.5 million in the district for 2024/25. This is a 7.1% decrease over 2024 and as 13.3% lower than pre-pandemic. There are however planned changes and improvements to bus infrastructure from 2026.

8.3 The Lancaster Local Cycling and Walking Infrastructure Plan (2024) identified an aspirational cycling network of approximately 355km to improve

connectivity, safety and coverage across the district. Walking and Cycling Statistics for England indicate that 10% of adults cycled at least once a week in 2023/24, broadly in line with the England average (10.1%). This represents a decline from 12.8% in 2022/23, reflecting a continuing pattern of year-to-year fluctuation in cycling participation since 2016.

Planning Policy Cabinet Advisory Group – 17 February 2026

Item 3 - Public Consultation on the Draft Forest of Bowland National Landscape Management Plan 2026-2031

1.0 Introduction

- 1.1 The Council has a duty as set out in Section 89 of the Countryside and Rights of Way Act 2000 to prepare and review Management Plans for the two National Landscapes in our area (Arnsdale and Silverdale NL and the Forest of Bowland NL). This work is delivered on the council's behalf by the relevant National Landscape staff units. The Management Plan for the Forest of Bowland NL has recently been reviewed and a draft produced to guide the management of these protected landscapes for the period 2026 – 2031. Once the consultation is complete and the Management Plan finalised, the Council will need to formally adopt the Management Plan to continue to meet its statutory duties.
- 1.2 This report summarises the scope and content of the draft Management Plan and details of the current public consultation.

2.0 Background

- 1.1 The Forest of Bowland was designated as an Area of Outstanding Natural Beauty in 1964, and spans 803 square kilometers across Lancashire and North Yorkshire. It is internationally recognised for its heather moorland, blanket bog, and rare upland bird species, including the hen harrier and curlew. The landscape comprises dramatic upland fells, wooded valleys, and undulating farmland, and offers a sense of tranquility and dark skies.
- 1.2 Despite its rural character, over one million people live within a 30-minute drive, making it a vital recreational resource. The area supports a working landscape of farming, forestry, water supply, and tourism, contributing significantly to local and national economies. Governance is provided by a partnership of local councils, agencies, landowners, and community groups. The plan acknowledges Bowland's role in delivering ecosystem services such as carbon storage, flood mitigation, and biodiversity conservation, while addressing challenges like climate change, development pressures, and inequalities in access to nature. Its strategic position near major urban centres enhances its importance for health, wellbeing, and sustainable tourism.
- 1.3 The previous Management Plan for the Forest of Bowland NL covered the period 2019 - 2025. This new draft Management Plan for the period 2026-2031 sets out 5-year strategy for how the landscape should be conserved, enhanced and managed, and how public bodies must now actively further the purpose of designation under the Levelling-Up and Regeneration Act 2023.
- 1.4 Council officers have been involved in the review and preparation of the draft Management Plan through attendance of the Forest of Bowland Joint Advisory Committee (JAC). The draft Management Plan takes account of a focused JAC workshop session in August 2025 where members of the JAC were involved in reviewing and preparing the details of the plan.

- 2.3 This is the first draft Management Plan to be produced since legislative changes in 2023 as a result of the Levelling-up and Regeneration Act 2023 (LURA) which amended the duty on relevant authorities in respect of their functions which affect land in National Parks, National Landscapes, and the Norfolk and Suffolk Broads (collectively referred to as Protected Landscapes) in England. Relevant authorities must now **‘seek to further’** the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to **‘have regard to’** their statutory purposes.
- 2.4 As set out by Department for the Environment, Food & Rural Affairs (DEFRA) ¹, *“the duty is intended to facilitate better outcomes for England’s Protected Landscapes, which are in line with their statutory purposes. The duty is intended to... [ensure] that the purposes for which Protected Landscapes are designated for are recognised in reaching decisions and undertaking activities that impact these areas”*.
- 2.5 NL Management Plans are meant to be taken as a guide for all partners and stakeholders to refer to when planning their own work within the National Landscape. They set out a range of objectives, desired outcomes and requirements for land management and project delivery within the National Landscape to achieve these outcomes. Some of these required actions and behaviours would be led by the National Landscape Partnership Unit, whilst many of the actions and behaviours would be led by other partners and stakeholders, with support from the National Landscape team where required.

3.0 Content

- 3.1 The draft Management Plan for Forest of Bowland National Landscape is split into four themes for delivery. Each theme represents an aspect of delivering the primary purpose.

Theme 1: Landscape

Theme 2: Nature Recovery

Theme 3: People

Theme 4: Place

- 3.2 For each of these themes the **‘Forces for Change’** which represent the current issues and opportunities in play have been described. There are then **‘Outcomes’**, **‘Measures’** and **‘Targets’** that have been drawn up in response to these predicted changes.
- 3.3 The management plan is also underpinned by 17 core principles that guide policy and practice. These are as follows:
1. Farming and sustainable land management
 2. Focus on outcomes, not prescriptions
 3. Collaboration and partnerships
 4. Reversing declines in upland nature through landscape-scale ecological networks
 5. Adapting to a changing climate
 6. Ecosystem services and benefits
 7. Managing landscape change
 8. Economy and Environment
 9. Integrated Nature and Heritage Conservation

¹ DEFRA Guidance for Relevant Authorities on seeking to further the purposes of Protected Landscapes (December 2024)

10. Balancing benefits
11. Using and valuing regulation
12. Access for everyone
13. Engagement and Inclusion
14. Learning and sharing
15. Arts and creativity
16. Gathering and sharing data and evidence
17. Sustainable funding and resource allocation

3.4 These principles collectively aim to deliver a resilient, inclusive, and economically viable future for Bowland.

4.0 Consultation arrangements

- 4.1 The Draft Management Plan is being consulted on between 19th January until 2nd March 2026. Full details can all be found on the consultation website. Accompanying the MP is the Strategic Environmental Assessment Screening (and Screening report), Habitats Regulations Assessment Screening report, the Equalities Impact Assessment Screening report, Climate Change Adaptation Plan and a Summary of the Landscape Character Assessment.
- 4.2 The consultation aims to collect views on the content of the plan and is open to anyone who lives or works in the area or anyone who visits it. This particularly includes residents, farmers, land managers, schools, businesses, local clubs, partner organisations and Parish Councils. If Members have comments on the Management Plan that they wish to raise, please could these be provided to the Chair of PPCAG.
- 4.3 As a relevant authority, Lancaster City Council will create a consolidated officer consultation response, which will be provided and submitted to the National Landscape team by the Planning Policy & Housing Strategy Team. The Chief Officer for Planning & Climate Change has been provided with delegated authority to formally submit the Council's response following consideration at this PPCAG group, and at Council Business Committee on 19th February.
- 4.4 Once all responses have been received, the Forest of Bowland National Landscape team will produce a consultation report which will reflect feedback that will be published online at the end of March 2026. Production of the final MP will take place by April 2026 and formal approval will be sought from the National Landscape Partnership/Joint Committee which will meet to endorse the revised plan. Final approval will then need to be sought from the relevant authorities² (including Lancaster City Council) prior to formal adoption of the MP, which is currently anticipated for May 2026, at which stage the Secretary of State (for Environment) is notified.

² Relevant Authorities are comprised of the following: Lancaster City Council, Lancashire County Council, North Yorkshire County Council, Pendle Borough Council, Preston City Council, Ribble Valley Borough Council, and Wyre Council.

Background documents

1. Forest of Bowland National Landscape draft Management Plan 2026-2031 consultation documents. Available at <https://www.forestofbowland.com/management-plan-2026>.
2. DEFRA Guidance for Relevant Authorities on seeking to further the purposes of Protected Landscapes (December 2024) [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK](#)

Appendix 1:

Lancaster City Council's response to the Forest of Bowland National Landscape Draft Management Plan consultation.

Lancaster City Council formal response (draft version)



Forest of Bowland National Landscape Management Plan 2026-2031 Public Consultation

* Required

1. Are you responding personally, or on behalf of an organisation? *

Personally

On behalf of an organisation

2. Which of the following **best** describes your point of view? *

Business

Conservation body
or NGO

Land
manager/farmer

**Local
government**

Local resident

Member of a
community group

Statutory body

Visitor to the area (live outside the National Landscape)

3. To what extent do you agree or disagree with the proposed **vision** for Forest of Bowland National Landscape? (see p.29 of the plan)

Strongly

agree

Agree

Neutral

Disagree

Strongly

disagree

4. Additional comments on the vision:

The Vision that the Forest of Bowland Management Plan provides is considered to be strong, clearly set out, and with detail included to be able to identify areas that will need docs for this to be achieved.

5. This Management Plan is built on a set of **core principles** which provide a framework to guide policy and practice in Bowland. Accepting these principles is essential to adopting and delivering the plan. Do you think we have identified all the relevant principles? (see p.29 of the plan) *

Yes

No

6. If you answered "No", please list any principles you think are missing, or provide suggestions for improving or clarifying the principles?

N/A

Please provide input to the Outcomes and Measures parts of the plan:

7. To what extent do you agree with the **outcomes** for **Landscape** (see p.33):

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

8. Please add any further comments about the **outcomes** for **Landscape**:

The Landscape theme focuses on conserving and enhancing Bowland's distinctive character, including its moorland fells, wooded valleys, and traditional farmed areas. Measures include restoring dry stone walls, hedgerows, and parklands; protecting skylines and dark skies; and ensuring new development respects local vernacular styles. Lancaster City Council are particularly pleased to see the focus on preserving dark skies. Lancaster has adopted specific local guidance its other National Landscape (Arnsdale & Silverdale National Landscape) in the form of the [Cumbria Good Lighting Technical Advice note](#), and Lancaster aims to have a similar level of guidance for the Forest of Bowland National Landscape through its Local Plan Review, which will also be inline with the Institution of Lighting Professionals (ILP) '[Bats and Artificial Lighting at Night Guidance note](#) (August, 2023).

9. To what extent do you agree with the **outcomes** for **Nature Recovery** (see p.39):

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

10. Please add any further comments about the **outcomes** for **Nature Recovery**:

Lancaster City Council considers that Nature Recovery is central to the plan and is therefore pleased to see that it is identified as one of the four central themes. The Management Plan addresses the urgent need to restore habitats and reverse species decline. Key outcomes of the Management Plan include bringing all remaining unrestored peatlands under restoration, expanding woodland and tree cover by 750 hectares by 2040, and safeguarding species-rich grasslands. Rivers and wetlands will be reconnected to floodplains and managed to improve ecological health. Champion species such as hen harrier, curlew, and black grouse will benefit from targeted conservation measures. Actions integrate climate adaptation strategies, such as enhancing hydrological function in peatlands and promoting resilient tree species. Collaboration with farmers and landowners is critical, supported by agri-environment schemes and green finance opportunities. These efforts contribute to national targets under the Protected Landscapes Framework and the global 30x30 commitment, which sees the UK having committed to protect 30% of land and sea for nature by 2030.

11. To what extent do you agree with the **outcomes** for **People** (see p.57):

Strongly agree

Agree

Neutral

- Disagree
- Strongly disagree

12. Please add any further comments about the **outcomes** for **People**:

Lancaster City Council is supportive of the 'People' theme's direction as it emphasises inclusive access, learning, and wellbeing, improves rights of way and creates accessible routes, supported by infrastructure such as all-terrain wheelchairs. The Council is supportive that the MP also sets out that educational initiatives will be used to engage schools, colleges, and lifelong learners, fostering skills in conservation and rural crafts. The Management Plan states that health and wellbeing programmes will assist in highlighting nature's therapeutic benefits, addressing barriers such as transport and cultural perceptions. Community engagement is integral to the plan, ensuring that diverse audiences can explore and appreciate Bowland's special qualities. These measures all collectively aim to strengthen the social contract between people and nature, promoting stewardship and resilience.

13. To what extent do you agree with the **outcomes** for **Place** (see p.68):

- Strongly agree**
- Agree
- Neutral
- Disagree
- Strongly disagree

14. Please add any further comments about the **outcomes** for **Place**:

Lancaster City Council is pleased to see that the Place theme addresses cultural heritage, regenerative tourism, and community vitality. Conservation of historic assets, ranging from prehistoric sites to vernacular architecture, is prioritised alongside adaptive reuse of redundant structures. The Management Plan sets out how regenerative tourism initiatives will reinvest economic benefits locally, promote experiences that are authentic to the Forest of Bowland area, and reduce environmental impacts through sustainable transport and visitor management. Community-focused actions include maintaining essential services, supporting volunteer networks, and fostering local enterprise. These strategies aim to create a resilient rural economy that complements environmental goals, to ensure that the Forest of Bowland National Landscape remains a living, working landscape with strong cultural identity.

15. Please use this final text box to share anything else you feel has not been covered or addressed in the plan:

The plan provides direction but is not spatial in its presentation. Some degree of spatial mapping may be beneficial to help to visually demonstrate the implications of the Management Plan. This could for example include mapping of the potential nature recovery opportunity areas, mapped tranquility zones, mapped dark-sky zones, mapped landscape

sensitivity areas, or mapped areas of potential woodland creation. A more specific spatial element to this would make it easier for Lancaster City Council to integrate the Management Plans aims into local policy through the Local Plan Review.

The draft Management Plan recognises issues such as congestion, parking overflow at honeypots and conflict on rural lanes, but doesn't give specific transport based solutions to these issues which could include 'on-demand' shuttle buses (such as 'dial-a-ride'/ app-based approaches).

The Management Plan recognised the opportunity to installation of small-scale renewables in the National Landscape however beyond referring how this could be tackled via community led section there is no other guiding principles and criteria for how this could be approached, including issues such as the need to assess viability, the impacts on grid infrastructure and also if there is potential for small-scale farm-based renewables which the City Council could look to incorporate into its Local Plan (evidence permitting).

The Management Plan also calls for 'sympathetic design' but offers no specifics around this. It is accepted that this will vary by site but further information around issues such as acceptable materials or guidance on conversions of rural building etc, as well as scale/massing threshold and lighting design criteria would be useful and could help feed into Local Plan policy. There are other National Landscape Management Plans in the UK such as the Cotswolds National Landscape Management Plan, Nidderdale National Landscape Management Plan, Arnsdale & Silverdale National Landscape Management Plan) which do provide more robust guidance around these issues.

In relation to visitor management the Management Plan acknowledges that the Forest of Bowland experiences stresses but doesn't offer ideas around solutions such as potential parking strategies, or visitor behaviour management (in relation to dogs, fires, wild camping for example) or any specific detail around the sustainable tourism transport network. More information round this would assist with Lancaster's ability to manage hotspots like the Trough of Bowland.

16. Would you like to comment on the **Climate Adaptation Plan**?

Yes

No

17. If yes, how far do you agree that the **Climate Adaptation Plan** covers the key issues and sets out the required measures to adapt to climate change?

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

18. Please add any further comments about the **Climate Adaptation Plan**:

Page No.	Comments
4	<p>Local climate bullet points omit heatwaves</p> <p>°c should be °C with a capitalised C (this goes for the whole document)</p> <p>“In Lancashire the hottest summer day so far on record was 30.1°c in 2023” - LCC is not clear where this figure is from, but disputes its accuracy. Hazelrigg weather station near Lancaster recorded a peak of 35.2°C on July 19, 2022 and the temperatures in 2022 in general were the highest throughout the country.</p> <p>“Winter months in Lancashire usually see 16 days of rain and this is projected to remain the same in the 2 and 4°c scenario” – the met office offers a customised risk assessment for each district area in the UK which is based on their own UKCP18 data. This data shows that for the Ribble Valley district (which comprises most of the FBOW) that the very minimum increase in winter rainfall under 4 degrees of warming is 15% and could be as high as 24%. This data can be found here: Explore the Climate of your Local Authority. LCC consider that is potentially misleading to include that 4 degrees of warming won't see an increase in winter rainfall days given the number could go up by 24%.</p> <p>LCC consider that there should be mention here of the increased risk of wildfires.</p>
Table on pages 5 and 6	<p>Woodlands – there is no reference here of the impact of waterlogging during prolonged periods of wet weather or flooding. Waterlogging can increase the likelihood of trees being brought down in storms and can increase the risk of disease.</p>
13	<p>“Limiting this rise to 1.5°c was the aim of the Paris Agreement and it is suggested that we have already reached this level in 2024.” – it should be noted that the Paris Agreement did not refer to a single year of above 1.5 degrees temperatures but to a long-term trend. Although this fact makes the situation no less urgent, according to international law the targets of the Paris Agreement have not yet been broken.</p>
20	<p>The future action planning section outlines an approach which will aim to ‘resist change to moorland management, habitats and soils over the next 20-30 years’ – this would be a disastrous approach and not something that LCC consider should be a suggestion in a Climate Adaptation Plan. Serious changes in management of land (particularly heather moorland, which is not a naturally occurring habitat and is of low ecological value, low ecosystem service, and high fire risk) need to happen BEFORE it's too late, not after 30 years when the situation will be severe.</p> <p>As above, LCC consider that the ‘Resist’ portion of the RAD approach outlined on this page is not best suited for an environment which is actively degrading (peatland and agricultural soils for example). The ecosystem in the Bowland Forest is in need of repair, and the most effective method of doing that is to change and management practices.</p>
Table on pages 21 and 22	<p>The third column of this table has been left empty.</p>

Main Actions Table	<p><u>Planning pressures - new development</u> There is mention here of the value of the floodplain and how it can alleviate flooding. This could therefore perhaps include a corresponding action for identifying spaces that could be introduced to the flood plain, such as agricultural land which is currently drained by ditches etc.</p> <p>It is unclear how 'pressure for building adaptations such as rooftop solar panels' could lead to 'loss of green/biodiverse spaces' such as meadows. Has this perhaps been placed in the wrong section?</p> <p><u>Towns and Settlements</u> Similar to the above, it is unclear how raingardens and water infiltration will improve air quality</p> <p><u>Moorland and peatland</u> LCC suggest that more actions are added into the fire risk section here, such as consideration of enhancing biodiversity, banning controlled burns, moving away from monoculture practices, re-wetting, potential fire breaks etc</p> <p><u>Upland Heath</u> The action here of 'improved heather management and grazing' could be misleading as to what is actually being supported. Does this include management practices such as controlled burns? Is this advocating a reduction in stocking rates or an increase?</p> <p>There is no mention of improving biodiversity on heather moorland. This would not only reduce the impact of the heather beetle, but also impact of droughts, reduce the risk of wildfires, and reduce risk of flooding elsewhere. It would also mean that bracken would be less likely to take over and would therefore lower management costs.</p> <p><u>Unimproved grassland</u> LCC consider that the CAP would benefit from additional specifics on the 'appropriate management' of purple moor grass and rush pasture, as this could be interpreted in multiple ways by the end user.</p>
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Your Response

19. Would you like your name to be displayed alongside your comments?

- Yes**
- No (if no, your response will remain anonymous)

20. Name:
Lancaster City Council

21. Please provide your email address if you'd like to be notified when the **Consultation Report** is available on our website. (Your email will not be published in the report.)

dneville@lancaster.gov.uk

22. We take your privacy seriously and will only use the information you provide for the purposes of the Management Plan consultation.

You can find our Privacy Notice here: <https://www.forestofbowland.com/privacy-notice> *

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