

To:
Planning Policy Consultation Team
Planning Directorate – Planning Policy
Division
Ministry of Housing, Communities and
Local Government
Floor 3, Fry Building
2 Marsham Street
London
SW1P 4DF

From: Monks Orchard Residents'
Association (MORA)

hello@mo-ra.co

Planning@mo-ra.co

5th March 2026

correspondence@communities.gov.uk

Dear Sir/Madam

Herewith our Response to consultation on the NPPF December 2025. We have co-ordinate our response with Comments and Endorsement from the group of Croydon Area Residents' Association's (CARA) and others.

Consultation Duration: This consultation began on 16 December 2025 and close at 11:45pm on 10 March 2026.

Your objectives

This consultation invites views on significant structural improvements to the Framework, so that for the first time there is a clear set of separate policies for both plan-making and decision-making.

This is intended to achieve three principal objectives, namely to:

- ***Ensure national planning policy is accessible and understandable*** for everyone who uses it.
- ***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
- ***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.

The case for non-statutory national policy.

We consider that the core aims of statutory National Development Management Policies can be secured within the current legal Framework, by:

- Setting out much clearer policies for planning and decision-making as proposed in this consultation.
- Making explicit that these decision-making policies should not be repeated in development plans; and

- Providing for these policies to bear on the system from day one, by requiring that any inconsistent local policies are immediately given very limited weight.

The case for non-statutory national policy.

(Our Answers in Red & Comments in Blue).

Question 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”?

Answer 1: Partly Agree.

- We suggest that the Policy includes further reference to the specific definitions for Local Plans of appropriate ‘Densities’ in accordance with the Local “Area Types” as defined in the National Model Design Codes & Guidance as published by the Department for Housing & Local Government in 2021.**
- (Local Governments’ have had plenty of time to include this as it was first published in 2021?).**

Changes to structure and content.

Changes to the structure of the Framework are proposed to improve its clarity, usability, and consistency.

We are proposing to retain individual chapters on different topics, though with some re-ordering:

- Introductory text on the purpose of the planning system and related high-level objectives has been brought into the introduction. This is so that material which explains how to use the document, and which sets the strategic context for the policies, is differentiated clearly from the policies contained in the subsequent chapters.
- This introduction is followed by procedural policies relating to plan-making (Chapter 2) and decision-making (Chapter 3), which are contained in separate chapters as found in the current Framework.
- Chapters on particular planning topics are then set out, beginning with policies on sustainable development and climate change, in view of their fundamental importance and because of the way they frame many of the policies in the chapters which follow.

Question 2: “Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making 13 policies?”

Answer 2: We partly agree.

- the changed structure seems more appropriate.**

Question 3: “Do you agree with the proposed set of annexes to be incorporated into the draft Framework?”

Answer 3: We Strongly Disagree.



- a) There is no mention of Housing “Design Codes & Guidance” and how to implement them?
- b) The Department of Housing & Local Government published the National Model Design Code & Guidance back in 2021, but these requirements and/or any updates, are not included in the revised NPPF (Was included under “Achieving appropriate Densities para 134 in NPPF December 2024), but have not been carried forward into NPPF2025/26 or included in Local Boroughs’ Local Plans.
- c) There is no reference to the implementation or methodology of Design Code requirements in this revised NPPF. The Plan Making Policies only require Local Authorities “to consider the use of Design Guides & Design Cdes.”
- d) The Design Code allocation contains the parameter definitions for “Growth” of a locality of “Area Types” are Not addressed.
- e) The Croydon Revised Local Plan 2025 currently undergoing Reg 19 approval, does NOT include any methodology, reference to, or implementation of Design Codes or Design Guides; It does not even consider the Local “Area Types” for the calculation of appropriate Densities for “Sustainable Developments” to meet Local Transport requirements.

Plan - Making Policies:

- a)
 - li) Should include the Establishment of “Area Types” be in accordance with the National Model Design Codes & Guidance to facilitate the definition of local Densities.

Annex B: Glossary

Design Code & Design Guide: should reference the National Model Design Code & Guidance document published by the DHC back in 2021.

Question 4: “Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?”

Answer 4 Strongly Disagree.

- a) We do not believe that travellers have the right to encamp on a Travellers site in a locality, unless they contribute to at least Band A council tax. (to offset costs of Site Management and for collection of Site generated waste).
- b) If a locality has allocated a Traveller’s Site and travellers encamp on an undefined local open space, they should be removed by the Local Police onto the allocated site and served with a Council Tax Bill and removal charges. If the Travellers object and refuse to move they should be issued a summons to appear in court for the offence.
- c) There is no Definition of Metropolitan Open Land (MOL).

Twelve key policy changes.

1. A permanent presumption in favour of suitably located development.

“We want to make clear what forms of development are acceptable in principle in different locations as part of creating a more rules-based approach to development. “...

As part of this change, we are also proposing a revised presumption in favour of sustainable development, underpinning the way the new policies direct different forms of development to the most appropriate locations – in effect applying a permanent presumption in favour of suitably located development.”

Response: Partially Agreed.

a) For this to be acceptable the Policy needs to define the specification and parameters of “Suitable Land” and the specific reason for “Unsuitable Land” within a locality (i.e. land of Area Type)

2. Building homes around stations.

*“We want to establish ‘in principle’ support – a “default yes” – for suitable proposals that develop land around rail stations within existing settlements, and around ‘well-connected’ train stations outside settlements, including on Green Belt land. We are also proposing a minimum density of **40 dwellings per hectare** around all stations and **50 dwellings per hectare** around ‘well-connected’ stations – maximising opportunities for sustainable development, making the most of high levels of connectivity, and improving access to jobs and services. “*

Response: Partially Agreed.

a) For this to be acceptable the Policy needs to define the parameters of “well connected” as opposed to “Not so well connected ... Stations.”

b) The Local Area Type at 20 to 40Units/ha = is Outer Suburban and 40- - 60 units/ha (50Units/ha) = Suburban. (National Model Design Code & Guidance -June 2021).

c) If the local area adjacent to a Station includes a “Sports Grounds” or “Village Green Cricket Pitches,” these areas should be precluded from this policy.

d) If the local area near a station includes a Conservation Area, or an area considered by the Local Authority to be of historic value and/or special character worthy of protection, then intensification should not apply to that part of the nearby area.”

3. Driving urban and suburban densification.

*“We want to get the most use out of land in **urban and suburban areas**, including through the redevelopment of **corner and other low-density plots**, upward extensions, and infill development – including within residential curtilages. These changes will support **higher density development in sustainable locations**, with good access to services.*



We are also setting clear expectations that authorities should set **minimum densities in well-connected locations**, including around train stations and town centres, and **support an overall increase in density within settlements**. “

Response: Partially Agreed.

a) *For this to be acceptable the Policy needs to define the parameters of “Low Density Plots” which are below the Local Area Type Defined Density.*

b) *Also, what is “well connected” as opposed to “Not so well connected” ... locations in terms of Frequency, adequate capacity, and access to centres of employment. Could the Transport availability be defined by Public Transport Accessibility Level TPAL as used by Transport for London be adopted for other regions.*

c) *These are limiting factors which if not considered could result in accidental over development for the locality.*

4. **Securing a diverse mix of homes.**

“We want to better support the needs of different groups through the planning system. This includes stronger support for rural social and affordable housing and setting clearer expectations for accessible housing to meet the needs of older and disabled people. It also means providing more flexibility on the unit mix of housing for market sale, where local requirements have been met for the mix of affordable homes.”

Response: Partially Agreed.

a) *For this Policy to work, the Local Authority need to define the requirement based upon the local percentages of age groups in the various wards and specify Targets as percentages for the demographics of the future. This should be included in the Local Plan for the various Areas.*

5. **Supporting small and medium sites.**

“We want to make it easier to bring forward small sites, through clear support for the principle of development in different locations, the policies on building more densely in settlements and strengthened support for mixed tenure development. We are also introducing a category of ‘medium development’ (see Annex C of this consultation document), linked to a range of policy and regulatory easements, to support a more streamlined and proportionate planning system – including exploring further the potential benefits and drawbacks of enabling developers to discharge social and affordable housing requirements through cash contributions in lieu of direct delivery.”

Response: Partially Agreed.

a) *Proposed Developments in this situation should reflect the “Local Area Type” as the supporting infrastructure and accessibility to Transport defines the Area Type and thus the acceptable density.*

6. **Streamlining local standards.**

“We want to promote certainty for applicants and speed up local plan production by limiting quantitative standards in development plans to only those specific issues where local

variation is justified. We also want to limit duplication of matters which are covered by the Building Regulations – other than where there is the existing ability to use ‘optional technical standards’.”

Response: Partially Agreed.

a) **Once a Local Plan has been approved and adopted, its revision every 5 years should be a simple matter as only policy changes foreseen need to be changed in the revision and subsequently adopted.**

b) **The Croydon Local Plan has been through two iterations since 2018 and still does not contain any reference in 2025 version to “Design Codes “and “Guidance” for various “Area Types”.**

7. Boosting local and regional economies.

“We want to encourage economic growth by giving substantial weight to the benefits of supporting business growth, and to particular areas and sectors - including those named in the Industrial Strategy, AI Growth Zones, logistics, town centres, and agricultural and rural development. We are also interested in views on whether the town centre sequential test should be removed, in order to allow greater flexibility to respond to changing patterns of demand.”

Response: Accepted.

a) **This can be achieved by judicial use of the already published National Model Design Codes & Guidance by the definition of Area Type variation.**

b) **Insufficient use has been made of this publication to Date.**

8. Supporting critical and growth minerals.

“We want to ensure that adequate provision is made for their extraction, recognising their economic importance. In parallel, and in view of the government’s mission to achieve clean power by 2030, we want to restrict further the extraction of coal.”

Response: Accepted Agreed.

9. Embedding a vision-led approach to transport.

“We want to further embed the changes made in December 2024, which signalled the importance of moving away from a ‘predict and provide’ approach to transport planning that can create unattractive environments dominated by cars. “

Response: Accepted.

a) **But it is not feasible to limit car usage unnecessarily.**

10 Better addressing climate change.

“We want to set out how decisions can take a proactive approach to both mitigation and adaptation in relation to climate change, in a way that links to other relevant policies in the draft Framework. “

Response: Accepted Agreed.

11 Conserving and enhancing the natural environment.

“We want to make a number of changes, including to reflect Local Nature Recovery Strategies, to recognise landscape character and conserve and enhance existing natural features, to incorporate swift bricks and to provide guidance on sites of local importance for nature. “

Response: Accepted Agreed.

12 Taking a more positive approach to the use of heritage assets.

“We want a clearer and more positive approach which can better support suitable heritage-related development, replacing the current policies that are difficult to navigate. “

Response: Accepted Agreed.

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Chapter 1: Introduction.

Question 5)

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

Answer 5) Partly Disagree.

a) “Using the Framework – Para 8” Disagree.

“The thematic chapters contain both plan-making policies and national decision-making policies so that the approach to particular topics can be seen in the round. However, the plan-making policies should not be used when making decisions on development proposals.”

b) We do not understand the reasoning for para 8. Either delete it or further explain its objective reasoning.

Other policy and guidance.

c) Para 13 – should include reference to the “[National Model Design Codes and Guidance](#)” published by the Dep for Housing & Local Government (2021).

Purpose of the planning system.

d) Para 14 – Requires further clarification as proposed:

“Use and development of land with adequate supporting infrastructure, in the long-term public interest...”

Chapter 2: Plan-making policies.

This chapter sets out policies that are designed to support the implementation of the new plan-making system, alongside new regulations, and guidance. It is split into three sections. Following a brief factual description of the required parts of the development plan, the first section sets out policies on the role that each type of plan is intended to play, and what

should be done in pursuit of this. There is then a set of policies on preparing plans, followed by a section setting out policy on the approach to examining each type of plan.

The plan-making framework.

PM1: Spatial Development Strategies.

Question 6) **Partly Agree.**

“Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?”

Answer Question 6)

- a) *Add para 2 J.*
- b) *“Para 2 J Obtaining support from local affected residents’ and adjacent authorities to any proposed Spatial Development Strategies”.*

Question 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?

Answer: 7) **Partly Agree.**

- a) **A revised Local Plan is only necessary if Local Housing need has increased above that previously defined and that the existing Local Plan does not address the additional need or the required improvement to the required supporting infrastructure.**

Question 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.

Answer 8) **Neither agree nor disagree.**

PM2: Local plans.

The policy explains the role of local plans in providing for new development and improving the environment at a local level, their required content, and that they should support the delivery of the spatial development strategies for their area. It also sets the expectation that local plans are prepared and adopted within 30 months, and that the preparation of the next plan should then commence within 5 years following adoption. The policy also makes clear

that there are circumstances in which an earlier revision should take place, including where a new spatial development strategy sets a significantly higher housing requirement, or where recommended by an Inspector at examination.

The policy sets out that local plans should cover a period of no less than 15 years from the point of adoption of the plan. However, we would welcome views on whether this plan period remains appropriate in the new plan-making system. An alternative would be to move to no less than 10 years, with the ability for local planning authorities to go beyond this if they wanted (for example to accommodate significant developments in future), given that local planning authorities will be required to commence preparation of a new local plan within 5 years of adopting their previous plan, the expectation that local plans are produced more quickly and kept up-to-date, and the additional evidence burden required for plans covering longer periods. We would particularly welcome views on this.

No Question Posed.

However, Add to PM2 Local Plans - Para 1 a)

v. *has particular regard to the proposed Design Codes and supporting infrastructure for the longer term as defined in the National Model Design Code & Guidance (2021).*

Question 9) Do you agree with the role, purpose and content of local plans set out in policy PM2?

Answer 9) Agreed.

Question 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.

Answer 10) Disagree –

a) 10 years would be more appropriate as demographics and requirements could change significantly within 15 years, less so in 10 years.

PM3: Minerals and waste plans.

No Question Posed – No Comment

PM4: Supplementary plans.

No Question posed.

Suggest modification to Para 1a.

a) PM4 Para 1 a Setting Out Locally specific “Design Codes” and “minimum” standards” As define in the National Model Design Code & Guidance (2021).

PM5: Neighbourhood Plans

No Question posed.



Suggest addition to Para 1.

- a) PM4 Para 1 a) Setting Out Locally specific “Design Codes” and “minimum” standards” As define in the National Model Design Code & Guidance (2021)
- b) These Neighbourhood Plans should endorse the ‘Area Type’ and ‘Design Codes’ of the locality as specified in the National Model Design Codes & Guidance published by the Department of Housing & Communities (2021).

Preparing plans.

PM6: General principles for plan-making.

Question 11)

Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies?

PM6 1c): Not duplicate, substantively restate, or modify the content of national decision-making policies unless directed by other policies in this Framework.

Answer 11) Partly Agreed.

- a) However, ADD New Para PM6 at 1 e)
 - i. 1 e) “ensure supporting infrastructure is appropriate for the developments with regard to population densities, health facilities, education facilities, and public transport availability, and that these facilities are planned to coincide with the progress of the development proposals; Etc ...”
 - ii. Existing e) renumbered f) & existing f) renumber g).

PM7: Initiating plan-making for local plans and minerals and waste plans.

“This policy applies to local plans and minerals and waste plans and explains how plan makers should initiate and manage the plan-making process to facilitate plan preparation and adoption within the 30-month timeframe. It includes policy for preparing a local plan timetable and using a project initiation document to collate key information. The aim is to support one of the core objectives of reform: speeding up plan preparation. “

Question 12) Do you agree with the approach to initiating plan-making in PM7?

Answer 12) Agreed - no further comment!

PM8: Evidence for plan-making.

“To help reduce the need for new evidence, the policy also sets out that evidence related to development needs that has been established early in plan preparation should only require reviewing and updating where there are strong reasons to do so.

The aim of the policy is to ensure that the evidence base to support a plan is relevant, proportionate, and sufficiently up to date, and that only evidence that is required to support a plan is produced.

Question 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.”

Answer 13) Partly Agree.

- a) The evidence base should also include reference to the Design Code & Guidance analysis provided in the National Model Design Code & Guidance published by the Department of Housing & Communities (2021).**

PM9: Identifying land for development.

This policy sets out how development plans should be informed by an assessment of land to meet development needs over the plan period. For plans that allocate specific sites, such as local plans, it establishes procedural principles for identifying, assessing, and selecting sites and aims to make the process faster, more consistent, and more transparent.

Question 14) Do you agree with the approach to identifying land for development in PM9?

Answer 14). Partly Agreed.

- b) Add New e) Should also identify specific areas of Land unsuitable for development and stating reasons for its unsuitability. (e.g. polluted land and type of pollution).**

PM10: Maintaining cooperation between plan-making authorities.

These policies replace the current Framework section on effective cooperation (NPPF 2024 paragraphs 24-28) and strengthen expectations for engagement between authorities. Key changes include placing stronger expectations on plan-making authorities to proactively engage with other bodies to identify and address cross-boundary issues, changes to support the new spatial development strategies system including making clear that issues do not need to be revisited where they have been addressed by spatial development strategies, and being more explicit about how authorities should demonstrate effective cooperation through statements of common ground.

Question 15)

Do you agree with the policies on maintaining and demonstrating cross boundary cooperation set out in policy PM10 and policy PM11?

Answer 15) Partly Disagreed.

Boundaries usually indicate extremities of development as they reflect areas of population for defining political representation.



- a) Where additional supporting infrastructure is needed: **agreed.**
- b) Where development needs that cannot be met wholly within a particular plan area could be met elsewhere; **Agreed.**
- c) To determine optimal locations for growth, such as in connected places for housing or along major transport corridors for some types of employment (which may necessitate alignment between different strategic planning authorities: **Agreed.**

Add

- d) There is also a need to cater for different 'Design Codes' across Local Authority boundaries and "Area Types" as defined in the National Model Design Codes & Guidance (See NPPF 2024 para134).

Otherwise Agreed.

PM11: Demonstrating cooperation between plan-making authorities.

"These policies replace the current Framework section on effective cooperation (paragraphs 24-28) and strengthen expectations for engagement between authorities. Key changes include placing stronger expectations on plan-making authorities to pro-actively engage with other bodies to identify and address cross-boundary issues, changes to support the new spatial development strategies system including making clear that issues do not need to be revisited where they have been addressed by spatial development strategies, and being more explicit about how authorities should demonstrate effective cooperation through statements of common ground..

Paragraphs 24 – 28 are in NPPF December 2024? - "Maintaining effective cooperation."

Question 15)

Do you agree with the policies on maintaining and demonstrating cross boundary cooperation set out in policy PM10 and policy PM11?

Answer 15) Party Agreed.

Add:

- d) There is also a need to cater for different 'Design Codes' and "supporting Infrastructure requirements" across Local Authority boundaries and "Area Types" as defined in the National Model Design Codes & Guidance (2021) (See NPPF 2024 para134).

PM12: Developer contributions.

This policy seeks to promote greater clarity at the plan-making stage on expected contributions to reduce the need for negotiation at the decision-making stage. The policy recognises developer contributions as tools to support viable delivery of the plan, the need for clear expectations, as well as circumstances for review mechanisms where contributions fall below plan policy requirements. Policy PM12 also reflects the introduction

**Representing, supporting, and working with the local residents
for a better community**



of spatial development strategies and acknowledges that contributions may apply at different tiers and across areas, with particular importance for strategic sites.

Question 16)

Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals?

Answer 16) Partly Agreed – but requires further definitions as stated below:

Add:

Developer contributions should also define the following:

- a) *The Plot Size in Hectares or sq.m.*
- b) *The Number of Dwellings demolished.*
- c) *The Number of Units (Dwellings) proposed.*
- d) *The number of Bedrooms per new dwellings*
- e) *The Number of Occupant or bedspaces per new dwellings*
- f) *The “Gross Internal Area “(Internal floor space) in sq.m. - appropriate for the number of bedrooms and number of proposed occupants for each of the number of dwellings,*
- g) *The “In-Built Storage space” appropriate for the number of bedrooms and Bed spaces.*
- h) *The Amenity Area appropriate for the Number of Dwellings and number of Bedrooms & Bed Spaces*
- i) *The relationship with all adjacent existing dwellings, buildings, or properties.*
- j) *The Access to the dwellings and the levels of access.*
- k) *The local public Transport Accessibility Level – PTAL at the locality*
- l) *The Local Flood Level Assessment.at the locality.*

Question 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?

Answer 17) Partly Agree.

Add:

“National Policy is set out in the National Model Design Codes & Guidance (NPPF 2024 para 134). Local Design Code Standards should be referenced and used for the Local Area as defined in the National Model Design Codes & Guidance and is relevant up to the boundary with an adjacent authority.

PM13: Setting standards.

The policy as drafted would limit local standards for energy efficiency, as we are concerned that varying standards across local plans make it difficult for the construction sector to adapt and deploy energy efficiency technologies at scale. If this specific restriction were to be taken forward following consultation, we intend to use secondary legislation to commence section 43 of the Deregulation Act 2015 to amend the Planning & Energy Act 2008 to make clear that local plans should not set higher energy efficiency standards for residential development. The draft Framework policy 24 would also replace the policy contained in the 2023 Written Ministerial Statement titled Planning – Local Energy Efficiency Standards Update.

“Beyond these areas, the policy identifies specific areas where local standards should not be set. This includes matters relating to the construction or internal layout of buildings (other than the nationally described space standard), **which the government considers are matters best left to the market to determine.**”

Question 18)

Do you agree with policy PM13 on setting local standards, including the proposal to commence S.43 of the Deregulation Act 2015?

Answer 18) Strongly Disagree.

For what reason should the market not abide by the national or local standards?

Section 43 of the [2015 Deregulation Act](#) amends the Planning and Energy Act 2008, specifically [removing the power for local authorities in England to require higher energy efficiency standards for new dwellings than those set out in building regulations, aligning planning policy with the government's goal for new homes to meet near-zero carbon standards.](#) This section essentially stops local plans from setting stricter rules than National building regulations on housing energy performance, as the government aimed for all new homes to be zero-carbon by 2016.

Key Points of Section 43:

- **Amendment:** It modifies Section 1 of the Planning and Energy Act 2008.
- **Impact:** It prevents local planning authorities in England from setting their own, higher energy efficiency requirements for new houses.
- **Reason:** This aligns local planning with national policy, where new dwellings were expected to meet zero net carbon emissions from 2016.
- **Scope:** The change applies only to England, not Wales *Status in 2025*

Implementation: While the Deregulation Act 2015 was passed years ago, Section 43 specifically required a commencement order to be fully active.

“Current Context: This section remains a critical part of the ongoing transition toward the Future Homes Standard, which centralises energy requirements for new builds to ensure consistency across the country. “

Examining Plans.

PM14: Examining Spatial Development Strategies.

No Question posed but requirement as follows:

- a. Positive.
- b. Appropriate
- c. Effective
- d. Consistent with national policy

We agree with these set criteria.

PM15: Examining Local Plans and Minerals and Waste Plans.

Question 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?

Answer 19) Yes Agreed

PM16: Examining supplementary plans.

This sets out policy on the streamlined examination process for supplementary plans, which focuses on legal compliance and testing whether the relevant plan-making authority has had regard to any relevant national policies and guidance issued by the Secretary of State.

No Question posed

We agree with these criteria.

PM17: Examining Neighbourhood Plans.

This policy adds to the current Framework paragraph 38 to make clear that the examination of neighbourhood plans will include an assessment of whether they accord with the policy that they should not duplicate, substantively restate or modify the content of national decision-making policies.

Question 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?

Answer 20)

Yes. The new NPPF seems to ignore the National Model Design Codes & Guidance published by the Department of Housing & Communities in 2021 and referenced in all subsequent NPPF's except this revised Draft NPPF 2025.

Is this intentional?

And if so, Why?

Chapter 3: Decision-making policies.

Preparing planning proposals.

DM1: Preparing planning proposals.

This policy revises paragraphs **40–44 and 47** of the current Framework to set out the general approach applicants and authorities should take when preparing applications. It places stronger emphasis on proportionality, The objective of the policies in this chapter is to ensure that development proposals are informed by appropriate information and decided in a way which is proportionate, timely and effective. This chapter provides a set of general decision-making policies which should be read with the rest of the thematic policies in the other chapters.

Smaller proposals would require less information and engagement.

Question 21)

Do you agree with the principles set out in policy DM1?

Answer 21) Yes Agreed.

Provided the proposal for small developments meets all Local Plan Policies.

DM2: Information Requirements.

Replacing paragraph 45 of the current Framework, this new policy promotes a more consistent and proportionate approach to local information requirements set out in local validation lists. It identifies, in conjunction with a new annex to the draft Framework, the information required to support national decision-making policies – such as in relation to transport, heritage, and flood protection – and makes clear that local lists should only include additional requirements where relevant local policies exist. These requirements must be proportionate to the scale of development.

We want to ensure that minor development - and our new proposed category of medium development - are not subject to excessive information requirements which may be suitable for larger developments but are disproportionate for this scale of development.

An alternative would be to take a regulatory approach, where information requirements related to national decision-making policies are required through development management regulations, as is currently done for design and access statements. This would provide more certainty and consistency, although it requires clear definitions of which applications would require each information requirement which for some issues could prove complex. We would welcome views about the appropriate approach.

Question 22)

Do you agree with the policy DM2 on information requirements for planning applications?

Answer 22) Partly Agreed.

Provided the minor development does not reduce space standards or amenity standards set by the Local Plan or does not reflect local character of Area Type Design Codes.



A Local Validation List should include all Design Codes for the locality and all parameters to establish compliance to policy, including the relationship to adjacent dwellings or buildings,

- a) All Plans and Elevations
- b) Access details and levels
- c) Relationship with adjacent dwellings or buildings.
- d) Site Area in ha or sq.m.
- e) Gross Internal Area per dwelling
- f) Number of Dwellings
- g) Parking provision
- h) Local PTAL (or equivalent Infrastructure)
- i) Local Flood Risk Assessment.

These are the minimum requirements.

Question 23)

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

Answer 23) **These are our views as follows:**

Validation of a proposal requires adequate information to allow complete analysis of the proposal by both Local authority and affected residents, to meet the applicable policies. If the information provided by the applicant is inadequate, it would be impossible to assess whether a proposal was acceptable to meet all the Policies appropriate for the proposal.

DM3: Determining Development Proposals

This new policy complements policy DM1 and revises paragraphs 39–44 of the current Framework. It reinforces the expectation that local planning authorities take a positive and proactive approach, work collaboratively with applicants, and apply proportionality when considering material considerations. It also encourages timely decisions, particularly where statutory consultee advice is delayed.

Question 24) Do you agree with the principles set out in DM3?

Answer 24)

Sub Para d). **Strongly Disagree;** The offer of full public consultation to be given to all proposals.

New Sub Para g) Proposals should be decided by the Local Planning Committee group of Councillors if the number of public consultees objecting exceeds a set threshold (suggested threshold of 10 objectors who provide valid reasons for objecting their objections).

Sub Para e) Consider whether otherwise unacceptable development proposals could be made acceptable through the use of planning conditions or planning obligations, **“but that any Planning Conditions or Obligations do NOT invalidate National or Local Plan Planning Policies; and ...”**

Sub Para f) Add. ***“Unless for reasons not covered by the published agreed and adopted Planning Policies. ...”***

DM4: Emerging development plan proposals

DM4: Emerging Development Plan Proposals This policy redrafts paragraphs 49-51 of the current Framework, with minor wording changes to reflect the new policy-based format.

No Question posed –

However,

1. When preparing and considering development proposals, relevant policies in emerging development plans may be given weight according to:

a. The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given).

Comment: The assessment of “greater weight” is extremely subjective and unquantifiable. It would be helpful if a quantifiable parameter for assessment and relationship be defined in a range e.g. given a weighting in the range 1 to 10 (or some other quantifiable level) which can then define what is Greater Weight and by how much.

b. The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

Unresolved objections are NOT acceptable if those objections reflect the proposal is contrary to local or national policies.

c. The degree of compliance of the relevant policies in the emerging plan with the policies for plan-making in this Framework (the closer the policies in the emerging plan to the policies in this Framework, the greater the weight that may be given to them).

Comment: The assessment of “greater weight” is subjective and unquantifiable. See answer a).

DM5: Development Viability.

The policy also refers to a new annex to the draft Framework on standardised inputs to viability assessment. Please refer to Annex B of this consultation document for further questions on the proposed annex.

the government also committed to clarify the use of **Section 73 applications**. We are taking steps today to remind the planning inspectorate, local planning authorities and developers that, as a general rule, attempts to revisit fundamental issues of viability or planning obligations through **Section 73 applications** should be scrutinised carefully, and the applicant should provide a robust justification for any changes proposed for planning obligations associated with the original permission beyond those linked to the specific variation of condition being sought.



Where developers submit a **Section 73 application** that seeks to reduce affordable housing provision based on a new viability assessment, the decision-maker should have regard to the harm that such a reduction may cause and give this appropriate weight in the overall planning balance, alongside the wider merits of the scheme.

A **Section 73 (s73)** application in UK planning is used to **vary or remove conditions on an existing planning permission**, allowing for minor changes to approved development without needing a full new application, essentially granting a fresh permission with different or no conditions attached, but it cannot alter the fundamental description or scale of the development itself. These applications are for amending things like working hours, materials, or minor design details, and they result in a new, standalone permission that runs alongside the original.

What it's for

- **Varying conditions:** Changing conditions like hours of operation, materials, or landscaping.
- **Removing conditions:** Getting rid of conditions deemed unnecessary or unreasonable.
- **Minor Material Amendments (MMA):** Can be used for slight changes to the approved scheme, but not fundamental alterations.

What it's *not* for

- Changing the basic description of the development (e.g., changing a house to flats).
- Adding new conditions.
- Extending time limits for implementation (use a Section 73A application for this).

What it's *not* for

- Changing the basic description of the development (e.g., changing a house to flats).
- Adding new conditions.
- Extending time limits for implementation (use a Section 73A application for this).

How it works

- You submit a new application to the local planning authority (LPA) using specific s73 forms.
- You must describe the proposed changes and justify why the conditions should be varied or removed.
- The LPA grants permission with new conditions, or refuses, or grants it with the original conditions (which results in refusal).



- A successful s73 application creates a new, independent permission, meaning you can choose to build under the old or new permission.

Question 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.

Answer 25) Strongly disagree, as this proposal could be used to possibly invalidate any local Plan revision, or revised National Planning Policies.

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

Answer 26) No.

Question 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? a) If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.

Answer 27) No.

Question 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.

Answer 28) No.

DM6: Use of Planning Conditions and Obligations

Question 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?

This refers to **para 56 to 58 of NPPF 2024.**

Answer 29) Agreed with Paras 1 through 4 of proposal (December NPPF).

However, - No Planning condition should undermine agreed Planning Policy.

DM7: Relationship with Other Regulatory Regimes.

Question 30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes?

Answer 30) Partly Agreed.

Add "National Policy is set out in the National Model Design Codes & Guidance (NPPF 2024 para 134). Local Design Code Standards should be referenced and

used for the Local Area as defined in the National Model Design Codes & Guidance and is relevant up to the boundary with an adjacent authority.

See also answer to Q18)

DM8: Unauthorised Development and Enforcement

Question 31) Do you agree with the new intentional unauthorised development policy in policy DM8?

Para 1 Agreed.

Para 2 Partly Agreed: –

If the breach of Planning was intentional, that fact should preclude Planning Consent.

The assessment of “greater weight” is extremely subjective and unquantifiable. It would be helpful if a quantifiable parameter for assessment and relationship be defined in a range e.g. given a weighting in the range 1 to 10 (or some other quantifiable level) which can then define what is Greater Weight and by how much.

Question 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?

Answer 32) If the specific type of harm cannot be rectified, the development should be demolished at cost to the developer.

DM9: Use of Development Orders.

No Question Posed.

This NPPF December 2025 policy states updates paragraphs 52 and 53 of the current Framework, but we believe it refers to para 54 of NPPF 2024.

Comment: We believe paragraph 54 sub paras a) to c) should be retained.

DM10: Article 4 directions.

Question 33) Do you agree with the new Article 4 direction policy in policy DM10?

Answer 33) Partly Agreed.

The Area of Article 14 Directive to be defined by extension to the area covered to the perimeter of the defining parameter. (PTAL or Area Type.)

Chapter 4: Achieving sustainable development.

S1: Positive Plan-Making.

S2: Producing a Spatial Strategy.

Question 34) Do you agree with the proposed approach to setting a spatial strategy in development plans?

Answer 34) Yes.

Reasons: A Spatial strategy based upon the National Model Design Code and Guidance for all Area Types for sustainability is a workable strategy that provides a common spatial strategy across the United Kingdom.

Question 35) Do you agree with the proposed definition of settlements in the glossary?

Settlement: *Includes cities, towns, villages, and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the development is complete. This includes areas defined as a settlement in the development plan (whether using defined settlement boundaries or equivalent terms, or criteria for identifying settlement extents). Settlements do not include hamlets and scattered groups of houses located outside predominantly built-up areas, unless specifically defined as a settlement in the development plan.*

Answer: 35) Agreed.

S3: Presumption in Favour of Sustainable Development

1. Decisions on development proposals should apply a presumption in favour of sustainable development. This means:

- a. Policy S4 in this Framework should be applied when considering development proposals within settlements.
- b. Outside settlements, policy S5 should be applied; and
- c. In all locations, development proposals that accord with an up-to-date development plan and also the decision-making policies in this Framework should be approved without delay.

Question 36) Do you agree with the revised approach to the presumption in favour of sustainable development?

Answer 36) Neither Agree nor Disagree.

S4: Principle of development within settlements.

a. Have an unacceptable impact in relation to:

- i. the allocation or safeguarding of land for particular uses in the development plan, unless there is no reasonable prospect of an application



- coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or
- ii the application of the policies in this Framework for safeguarding existing open space, sport and recreation facilities (HC7), Local Green Space (HC8), designated wildlife habitats (N6) and for managing development within residential curtilages (L2); or b. Involve the whole or
 - b. partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable compensatory provision is made which does not increase the risk of flooding either on or off-site); or
 - c. Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.

Question 37) Do you agree to the proposed approach to development within settlements?

Answer 37) Neither Agree nor Disagree.

S5: Principle of Development Outside Settlements

Question 38) Do you agree to the proposed approach to development outside settlements?

Answer 38) Neither Agree nor Disagree.

Question 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?

Answer 39) Neither Agree nor Disagree.

Question 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?

Answer 40) Neither Agree nor Disagree.

S6: Neighbourhood Plans and the Presumption

Question 41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy?

Answer 41) Neither Agree nor Disagree.

Chapter 5: Meeting the challenge of climate change.

Question 42) Do you agree with the approach to planning for climate change in policy CC1?

Answer 42) Neither Agree nor Disagree.

National decision-making policies CC2: Mitigation of Climate Change.

Question 43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

Answer 43) Neither Agree nor Disagree.

CC3: Adaptation to Climate Change.

Question 44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?

Answer 44) Neither Agree nor Disagree.

Chapter 6: Delivering a sufficient supply of homes.

Plan-making policies HO1: Assessing the need for homes.

Policy HO1 redrafts parts of paragraphs 62 and 63.

No Question Posed.

HO2: Setting Housing Requirement Figures.

Question 48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate?

Answer 48) Neither Agree nor Disagree.

Question 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?

Answer 49) Partly Agree.

Further guidance required on the needs for older people as currently developer only provide two storey dwellings and flats. Bungalows are being demolished for their greater area and replaced by blocks of up to nine flats. This reduces to number in single storey bungalows for the elderly.



Question 50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter?

Answer 49) Neither Agree nor Disagree.

Question 51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures?

Answer 51) Partly Disagree.

HO2 para 4 Costs of provision and site management should be recovered by a new Council Tax Band for Travellers sites, or at least Band A).

HO3: Providing Land for Homes

Question 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?

Answer 52) Partly Disagree.

Annex D The Housing Delivery Test Para 12 to be dependent on meeting the Council Tax Charges on Sites for previous years before additional allocation provided.

Question 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?

Answer 53) Partly Agree.

There should be a qualifying additional figure based on the local waiting list for accommodation by the local authority.

Question 54) Do you agree the requirements to establish a 5-year supply of deliverable traveller sites and monitor delivery are sufficiently clear?

Answer 54) Partly Agree.

So long as a positive response to Question 51 above.

HO4: Land for large scale residential and mixed-use development

Question 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?

Answer 55) Partly Agree..

There should be an allocation of Health Service facilities including GP Surgeries, in proportion to the number of proposed residents of large-scale residential development.

There should be an appropriate allocation of School places plus amenity facilities in proportion to the number of proposed residents of large-scale residential development.

Is this *included as necessary infrastructure along with Transport facilities?*

HO5: Meeting the needs of different groups.

Question 56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?

Answer 56) **Agreed.**

Question 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?

Answer 57) **Partly Agree.**

The M4(2) & M4(3) Delivered requirements should be related to the proportion of disabled residents in the population.

Question 58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion?

Answer 58) **Agreed.**

Question 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?

Answer 59) **Agreed.**

Question 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?

Answer 60) **Partly Agreed.**

Why 150 homes and NOT for 100 Homes or more?

HO6: Planning for a diverse mix of sites.

Question 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?

Answer 61) **Partly Agreed.**

The allocation of Number of dwellings per hectare should meet the National Model Design Code & Guidance of the 'Area Type' (outer Suburban or Suburban)

Reason – this is the National guidance.

Chapter 7 - National decision-making policies.

HO7: Meeting the need for homes.

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

Answer 62) Neither Agree nor Disagree.

HO8: Providing Affordable Homes.

Question 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?

Answer 63) Neither Agree nor Disagree.

Question 64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing?

Answer 64) Neither Agree nor Disagree.

Question 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?

Answer 65) Neither Agree nor Disagree.

Question 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?

Answer 66) Neither Agree nor Disagree.

Clarify stepping stone housing definition?

On-Site Affordable Housing Provision.

Question 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?

Answer 67) Neither Agree nor Disagree.

Question 68) What risks and benefits would you expect this policy to have?

Answer 68) Neither Agree nor Disagree.

Question 69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly?

Answer 69) Neither Agree nor Disagree.



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

Answer 70) Neither Agree nor Disagree.

Question 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?

Answer 71) Neither Agree nor Disagree.

HO9: Specialist forms of accommodation.

Question 72) Do you agree the with the criteria set out regarding the locations of specialist housing for older people?

Answer 61) Partly Agreed.

The M4(2) & M4(3) Delivered requirements should be related to the proportion of disabled residents in the population.

Question 73) Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary?

Answer 73) Neither Agree nor Disagree.

Question 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?

Answer 74) Neither Agree nor Disagree.

HO10: Exception Sites

Question 75) Do you agree the proposals provide adequate additional support for rural exception sites?

Answer 75) Partly Agreed.

The provision of adequate additional support for rural exception sites should include compliance to the Design Codes and Rural Area Type definitions in the Nation Model Design Codes & Guidance published by the Department of Housing & Communities in 2021.

Question 76) Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site?

Answer 76) Neither Agree nor Disagree.

Question 77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes?

Answer 77) Neither Agree nor Disagree.

HO11: Isolated homes in the countryside.

No Questions Posed.

HO12: Traveller Sites.

Question 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?

Answer 78) Neither Agree nor Disagree.

Question 79) **No comment.**

HO13: Build out of residential and mixed-use development.

Question 80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period?

Answer 80) Agreed.

Housing Delivery Test Rule Book

Question 83) Do you agree with the proposed changes to the Housing Delivery Test rule book?

Answer 83) Neither Agree nor Disagree.

Chapter 7- Building a strong, effective economy.

Plan-making policy.

E1: Providing the conditions for long term economic growth.

Question 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?

Answer 84) Strongly Agree.

National decision-making policies

E2: Meeting the need for business land and premises.

Question 85) Do you agree with the approach to meeting the need for business land and premises in policy E2?

Answer 85) Agreed.

E3: Freight and logistics.

Question 86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?

Answer 86) Agreed.

E4: Rural business development

Question 87) Do you agree with the approach to rural business development in policy E4?

Answer 87) Neither Agree nor Disagree.

Chapter 8- Ensuring the vitality of town centres.

Plan-making policy.

TC1: Planning for town centres.

Question 88) Do you agree with the proposed changes to policy for planning for town centres?

Answer 88) Partly Agree.

Additionally, Town Centre developments should be within the constraints of supporting infrastructure i.e. medical facilities (GP surgeries), school places, and local amenities. (Specified as proportion of old plus new occupants).

National decision-making policies.

TC2: Development in town centres.

Question 89) Do you agree with the approach to development in town centres in policy TC2?

Answer 89) Partly Agree.

Intensification should be limited to the parameters defined by the “Area Type” as defined in the National Model Design Codes & Guidance. There should not be reductions in accommodation Standards below the Area Type guidance.

TC3: Main town centre uses outside town centres.

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

Answer 90) Partly Agree.

Outbuildings within the curtilage of a dwellings should NOT exceed the Classe E limit dimensions.

Question 91) Do you believe the sequential test in policy TC3 should be retained?

Answer 91) Agreed.

TC4: Assessing the impact of development on town centres.

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

Answer 92) Neither Agree nor Disagree.

Chapter 9 - Supporting high quality communications.

TI1 CO1: Proposals for Telecommunications Infrastructure.

No questions posed.

TI2: CO2: Telecommunications Infrastructure – Supporting Information

Question 93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?

Answer 93) Neither Agree nor Disagree.

Question 94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities?

Answer 94) Strongly Agree.

Question 95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens?

Answer 95) Strongly Agree.

Chapter 10: Securing Clean Energy and Water.

Plan-making policies.

W1: Planning for Energy and Water.

Question 96) Do you agree with the approach to planning for energy and water infrastructure in policy W1?

Answer 96) Agreed.

W2: Securing Renewable and Low Carbon Energy and Electricity Network Infrastructure.



Question 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?

Answer 97) Agreed.

National decision-making policies.

W3: Renewable and Low Carbon Energy Development and Electricity Network Infrastructure.

Question 98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?

Answer 98) Neither Agree nor Disagree.

W4: Water Infrastructure.

Question 99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4?

Answer 99) Neither Agree nor Disagree.

Chapter 11: Facilitating the sustainable use of minerals.

Plan-making policies.

M1: Planning for a Sufficient Supply of Minerals.

Question 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?

Answer 100) Neither Agree nor Disagree.

Question 101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas?

Answer 101) Neither Agree nor Disagree.

Question 102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of 'minerals of national and local importance'?

Answer 102) Neither Agree nor Disagree.

M2: Safeguarding Mineral Resources and Infrastructure Through Plan-Making.

Question 103) Do you agree criteria b) of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non-minerals development?

Answer 103) **Neither Agree nor Disagree.**

Question 104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals?

Answer 104) **Neither Agree nor Disagree.**

Question 105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3?

Answer 105) **Neither Agree nor Disagree.**

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

Answer 106) **No comment.**

M4: Considering the Impacts of Mineral Development.

Question 107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply?

Answer 107) **Neither Agree nor Disagree.**

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

Answer 108) **No comment.**

M5: Development Involving Peat, Coal, or Onshore Oil and Gas

Question 109) Do you agree with approach to coal, oil and gas in policy M5?

Answer 109) **Neither Agree nor Disagree.**

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

Answer 110) **No.**

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

Answer 110) **Not appropriate.**

M6: Safeguarding Mineral Resources and Infrastructure through decision making.

Question 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?

Answer 112) Neither Agree nor Disagree.

Question 113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas?

Answer 113) Neither Agree nor Disagree.

Chapter 12: Making effective use of land.

Plan-making policy.

L1: Planning for an Effective Use of Land.

Question 114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?

Answer 114) Partly Agree.

Question 115) If not, what further guidance is needed?

Answer 115) Site allocations of developments should meet the Design Code of the 'Area Type' as defined in the [National Model Design Code & Guidance](#) as published by the Department of Housing & Communities 2021.

(see NPPF 2024 para 134)

L2: Making effective use of land.

Question 116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?

Answer 116) Partly Agree.

Site allocations of developments should meet the Design Code of the 'Area Type' as defined in the [National Model Design Code & Guidance](#) as published by the Department of Housing & Communities 2021.

(see NPPF 2024 para 134).

Question 117) Do you agree policy L2 identifies appropriate typologies of development to support intensification?

Answer 117) Neither Agree nor Disagree.

Question 118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?

Answer 118) Neither Agree nor Disagree.

Question 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.

Answer 119) Neither Agree nor Disagree.

Question 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.

Answer 120) Neither Agree nor Disagree.

L3: Achieving Appropriate Densities

Question 121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?

Answer 121) Partly Agree.

Densities should reflect the Site capacities and respect the minimum spaces standards with adequate in-built storage and amenity space as defined in the London plan (The London Plan SPG guidance) and the National Model Design Code and Guidance (2021).

Question 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?

Answer 123) Strongly agree.

Question 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?

Answer 124) Partially Agree.

Well, Connected is an inadequate parameter. There needs to be a more appropriate measure of connectivity to define "Well Connected".

Question 125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards (Yes/No).

Answer 125) **Yes** - Reference should be made to the [National Model Design Code & Guidance](#) as published by the Department of Housing & Communities 2021.

(see NPPF 2024 para 134).

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

Answer 126) **Partly Agree.**

A parameter on connectivity is required to 'define well connected' similar to that defining Public Transport connectivity parameter 'PTAL' by TfL.

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

Answer 127) **See answer to Question 126.**

L4: Residential Extensions.

Question 128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?

Answer 128) **Partly Disagree (as inadequate).**

Residential Extensions should NOT obstruct a neighbour's amenity. The line struck from the centre of the nearest ground floor window at 45° towards the neighbour's extension – horizontally or vertically - should clear the Extension building. If it intersects the extension building, the extension is inappropriate and should be refused development.

In addition, the extension should meet all planning policies appropriate for a dwelling.

10. Protecting Green Belt land. Plan-making policies.

GB1: Establishing new Green Belts.

Question 130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts?

Answer 130) **Neither Agree nor Disagree.**

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

Answer 131) **Not applicable.**

Question 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?

Answer 132) Agreed.

GB3: Altering Existing Green Belt Boundaries.

Question 133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?

Answer 133) Partially Agree.

Need definition of "Suitable Stations".

Para 1a This policy is inappropriate for Stations serving heritage Railway lines e.g. The Bluebell Railway Line in Sussex and other similar Heritage Lines.

A possible solution for definition of appropriate Stations would be – For Only Stations with Direct Line Access to designated "Opportunity Areas" for employment and business opportunities. This would preclude Heritage Railway Stations and other Stations from inappropriate development intrusion.

GB4: Defining Green Belt boundaries.

No Question Posed.

However, the definition should included Heritage Sites and land around Heritage Sites.

GB5: Beneficial Uses of Green Belt.

Question 134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?

Answer 134) Neither Agree nor Disagree.

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

Answer 135) Not Applicable.

National decision-making policies.

GB6: Control of development in the Green Belt.

No Question Posed.

GB7: Development which is not inappropriate in the Green Belt.

"Not inappropriate" means.

something is probably *acceptable, suitable, proper, or reasonable* for a given situation, acting as a double negative that cancels out the negative meaning of "inappropriate" (unsuitable/improper) to affirm its fittingness, often used to soften a



positive statement or indicate something is in a neutral middle ground. It implies that something is not wrong, offensive, or out of place, but rather justifiable or permissible.

Question 136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?

Answer 136) We Strongly Disagree.

We disagree with GB7 (1f): - The replacement of "preserve openness" with "restrictions that ensure the impact on openness is minimised".

Under the "National Planning Policy Framework - Plan-making and national decision-making policies -December 2025" under "13. Protecting Green Belt land" it states in the key introduction to the policy that: -

"The objective of Green Belt policy, as set out in this chapter, is to prevent urban sprawl by keeping land permanently open. The government attaches great importance to Green Belts, the essential features of which are their openness and permanence".

The replacement of "Preserve openness" with "restrictions that ensure the impact on openness is minimised" is in direct conflict with this policy objective. The damage that will be caused by this change is contrary to the stated importance the Government attach to the Green Belt and its essential openness. Having decided it is necessary to move some Green Belt boundaries and de- designate some areas of Green Belt in order to allow development, it is vital that remaining Green Belt areas remain fully protected and do not get damaged by reducing their openness.

Minimising the damage to the openness does not mean the damage will not be considerable. Given that it is deemed essential to reduce the amount of Green Belt land, it is even more important and is the Government's stated policy to protect the openness of the Green Belt that will remain.

The words "preserve the openness" are clear and precise. The Inspectorate frequently use the words "harming the openness" when making their judgement dismissing appeals. A proposal either does harm the Green Belt, or it doesn't harm the Green Belt. Making decisions as to whether the impact is sufficiently minimised or not, is much more subjective and harder to ensure consistency prevails across the National decision-making process. There may be a wide gap between one Case Officer's / Inspector's approach and another's. That will be bad for reliable due process.

We strongly disagree that as stated in GB7 1 as it applies in GB7 1 (f) (v,) that "the following categories are not inappropriate in the Green Belt and therefore should not be regarded as harmful to the Green Belt or required to demonstrate very special circumstances". It surely should not be right, for

example to allow a sports proposal that is harmful to a section of Green Belt despite the applicant minimising the damage as far as possible. Despite minimising as far as is possible, the proposal may cause serious damage.

We have experienced 2 examples where Inspectors dismissed appeals against a Council's rejection of applications to erect multiple, 6-metre-high floodlights on tennis courts. (APP/L5240/A/06/2011783 & APP/L5240/A/00/1043147).

The applicants had reduced the sizes of the poles on which the floodlights were housed as far as they could, whilst still having a viable way of lighting the courts. They had thus minimised the damage to the openness of the Green Belt as far as possible. None-the-less the proposed poles, reduced in height as much as possible, were still deemed to combine with the fence surrounding the courts, creating the impression of enclosure and thus harming the openness of the Green Belt. It was considered by the Inspectorate that special circumstances were required. Under the proposed changes, the developments would not have been inappropriate in the Green Belt and not regarded as harmful to the Green Belt or required to demonstrate very special circumstances. There will no doubt be many examples like these in recent years across the country, where under these proposed changes to the Planning Policy Framework, approval would have been given to proposals that seriously damage the openness of the Green Belt.

The circumstance where a development is deemed not inappropriate in the Green Belt and not regarded as harmful to the Green Belt, need to be much more specific and precise and thus much clearer about the requirement not to harm the openness of the Green Belt unless there is very good reason (special circumstances). The policy should not be in conflict with the Government's stated policy where it attaches great importance to Green Belts, the essential features of which are their openness and permanence."

Question 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?

Answer 137) Partly Agree.

GB7 h. Development for housing and mixed-use development which would:

i. be within reasonable walking distance of a railway station capable of providing a high level of connectivity to services and employment;⁵².

What is "Reasonable" - this is subjective and the distance should be defined on level ground (Unreasonable, or less distance if on an incline).

ii- be physically well-related to a railway station or a settlement within which the station is located; Define "*well related and in what physical relationship is considered well-related*". *Otherwise, this is meaningless.*

iii - but only for Green Belt land that is "less valuable" e.g. green belt land that is not accessible by all.- but only where there is "an evidenced unmet need for the type of development proposed" - same clause as for Grey Belt - this type of development should be after all development on Grey Belt has been exhausted..

- but only for Green Belt land that is "less valuable" e.g. green belt land that is not accessible by all.

- but only where there is "an evidenced unmet need for the type of development proposed" - same clause as for Grey Belt

- this type of development should be after all development on Grey Belt has been exhausted.

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

Answer 138) Gypsies & Travellers have no reason to object to adverse impacts as they do not contribute to local society. (unless they pay Band A Council Tax).

GB8: Golden Rules.

Question 139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?

Answer 139) Neither Agree nor Disagree.

Question 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 77 assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?

Answer 140) Do not have an opinion.

Question 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?

Answer 141) Neither Agree nor Disagree.

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

Answer 142) Not appropriate.

Question 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?

Answer 143) Agreed.

Question 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?

Answer 143) **No.**

Guidance and Glossary.

Question 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?

Answer 145) **Neither Agree nor Disagree.**

Chapter 14: Achieving well-designed places.

Plan-making policies.

DP1: A Strategy for Design

Question 146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?

Answer 146) **Partly Agree.**

Add e. Identify the “Area Type” as described in the National Model Design Code and Guidance (See NPPF 2024 para 134) to ensure development parameters meet the Area Type ranges with appropriate supporting infrastructure.

DP2: Design Guides, Design Codes and Masterplans.

Question 147) Do you agree with the approach to design tools set out in policy DP2?

Answer 147) **Partly Agree.**

Reference the National Model Design Code and Guidance (See NPPF 2024 para 134) to ensure development parameters meet the Area Type ranges with appropriate supporting infrastructure.

National decision-making policies.

DP3: Key Principles for Well-Designed Places.

Question 148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?

Answer 148) **Partly Agree.**

Reference the National Model Design Code and Guidance (See NPPF 2024 para 134) to ensure development parameters meet the Area Type ranges with appropriate supporting infrastructure.

DP4: The Design Process.

Question 149) Do you agree with the proposed approach to using design review and other design processes in policy DP4?

Answer 149) **Neither Agree nor Disagree.**

Chapter 15: Promoting sustainable transport.

Plan-making policies.

TR1: Vision-Led Approach to Planning for Transport.

Question 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?

Answer 150) **Partly Agree.**

Give more information on the parameters obtained by use of the Gov Connectivity Tool (Connectivity Tool - GOV.UK) see TR3.

TR2: Local Parking Standards.

Question 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?

Answer 150) **Agreed.**

National decision-making policies.

TR3: Locating Development in Sustainable Locations

Question 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?

Answer 152) **Neither Agree nor Disagree.**

Question 153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?

Answer 153) **Neither Agree nor Disagree.**

TR5: Roadside Facilities.

Question 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?

Answer 154) **Neither Agree nor Disagree.**

TR6: Assessing transport impacts.

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?

Answer 155) **Neither Agree nor Disagree.**

TR7: Marine Ports, Airports and General Aviation Facilities.

Question 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?

Answer 156) **Neither Agree nor Disagree.**

TR8: Public Rights of Way.

Question 157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8?

Answer 157) **Partially Agree.**

Add the definition and requirements for access to sites, Site Entrance widths, Turning Circle limits, Drive lengths etc. to cater for emergency vehicle access. Limit of length before a passing bay is required.

Chapter 16: Promoting healthy communities.

Plan-making policies.

HC1: Planning for healthy communities.

Question 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?

Answer 158) **Partially Agree.**

Provide guidance on relationships for provision of services for proportion of population of a locality e.g. Number of GP practices per 1000 population etc.

For Health Services and school places. Etc.

HC2: Local Green Space.

Question 159) Do you agree that Local Green Space should be 'close' to the community it serves?

Answer 158) **Partially Agree.**

Area of outdoor recreation area per 1000 population should be stated.

Decision-making policies.

HC3: Community facilities and public service infrastructure serving new development.

No Question Posed.

HC4: Proposals for new community facilities and public service infrastructure.

Question 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?

Answer 160) **Partially Agree.**

Area of outdoor recreation area per 1000 population should be stated.

HC5: Hot food takeaways and fast-food outlets.

Question 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?

Answer 160) **Partially Agree.**

Define "Reasonable walking distance"?

HC6: Retention of key community facilities and public service infrastructure.

Question 162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?

Answer 160) **Partially Agree.**

Provision of meeting places, halls or Committee Rooms, in relation to number of served population.

HC7: Development affecting existing recreation facilities.

Question 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?

Answer 163) **Agreed.**

HC8: Development affecting Local Green Space.

Question 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?

Answer 164) **Agreed.**

Chapter 17. Pollution, public protection and security.

Plan-making policies.

P1: Planning for Clean, Liveable and Healthy Places.

Question 165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans?

Answer 165) **Neither Agree nor Disagree.**

Decision-making policies.

P2: Ground Conditions.

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

Answer 166) **Neither Agree nor Disagree.**

P3: Living Conditions and Pollution.

Question 167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution?

Answer 167) **Neither Agree nor Disagree.**

P4: Impact of Development on Existing Activities.

Question 168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle?

Answer 168) **Neither Agree nor Disagree.**

P5: Maintaining Public Safety and Security.

Question 169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals?

Answer 169) **Neither Agree nor Disagree.**



P6: Land and Operations for Defence and Public Protection.

Question 170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes?

Answer 170) Neither Agree nor Disagree.

Define "Substantial weight"

Chapter 18: Managing Flood Risk and Coastal Change.

Plan-making policies.

F1: Assessing Flood Risk for Plan-Making.

No Questions Posed.

F2: Planning for Effective Flood Risk Management.

No Questions Posed.

F3: Managing Coastal Change.

Question 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?

Answer 171) Neither Agree nor Disagree.

National decision-making policies.

F4: Assessing flood risk for decision-making.

No Questions Posed.

F5: The Sequential Test.

Question 172) Do you agree with the proposed clarifications to the sequential test set out in policy F5?

Answer 172) Partly Agree.

The 'Sequential Test' outlined, does NOT take due account of the local 'escarpments nor relationships, where surrounding higher ground levels (which are not subject to flooding), could discharge surface water to lower levels, making them subject to flooding.



F6: Development in Areas at Risk of Flooding from Rivers or the Sea

Question 173) Do you agree with the proposed approach to the exception test set out in policy F6?

Answer 173) **Neither Agree nor Disagree.**

F7: Ensuring Development is Safe from Flooding.

No Questions Posed.

F8: Sustainable Drainage Systems and Watercourses.

Question 174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?

Answer 174) **Neither Agree nor Disagree.**

Question 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?

Answer 175) **Neither Agree nor Disagree.**

Question 176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change?

Answer 176) **Neither Agree nor Disagree.**

Question 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?

Answer 177) **Neither Agree nor Disagree.**

Annex F: Managing Flood Risk and Coastal Change.

Question 178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications?

Answer 177) **Disagree.**

Cannot Locate Table 2

Chapter 19: Conserving and enhancing the natural environment.

Plan-making policies.

N1: Identifying environmental opportunities and safeguards.

Question 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?

Answer 179) **Agreed.**

Question 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?

Answer 180) **Don't Know.**

National decision-making policies.

N2: Improving the natural environment.

Question 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?

Answer 181) **Agreed**

N3: Trees in new development.

No Questions Posed.

N4: Protected Landscapes.

Question 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?

Answer 182) **Agreed.**

N5: Maintaining the character of the coast.

No Questions Posed.

N6: Areas of particular importance for biodiversity.

Question 183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?

Answer 183) **Neither Agree nor Disagree.**

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

Answer 183) **None offered.**

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

Answer 184) **None offered.**

Chapter 20: Conserving and enhancing the historic environment.

Question 185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act?

Answer 185) **Neither Agree nor Disagree.**

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

Answer 186) **None.**

Plan-making policies.

HE1: Planning for the Historic Environment.

No Questions Posed.

HE2: Conservation Areas and World Heritage Sites.

No Questions Posed.

HE3: Historic Environment Records.

Question 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?

Answer 187) **Neither Agree nor Disagree.**

National decision-making policies.

HE4: Securing the Conservation and Enhancement of Heritage Assets.

No Questions Posed.

HE5: Assessing Effects on Heritage Assets.

Question 188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5?

Answer 188) **Neither Agree nor Disagree.**

HE6: Proposals Affecting Designated Heritage Assets.

Question 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?

Answer 189) **Agreed.**

HE7: Decisions on Non-Designated Heritage Assets.

No Questions Posed.

HE8: World Heritage Sites.

No Questions Posed.

HE9: Conservation Areas.

No Questions Posed.

HE10: Archaeological Assets.

Question 190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10?

Answer 190) **Neither Agree nor Disagree.**

HE11: Loss or Removal of Heritage Assets.

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

Answer 190) **No – Agreed.**

Further questions.

Status of the draft Framework for plan-making.

Development plans will not be required to follow the revised Framework until the final version is published (and then the extent of effect will depend on final transitional arrangements).

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

Answer 192) **Agreed.**

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

Answer 193) **No.**

Written Ministerial Statements and other documents.

Question 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?

Answer 194) **No.**

Need to add to Item 5. “Spatial development strategies should comply with the National Model Design Codes and Guidance”.

Annex A - Data Centres and onsite energy generation.

Question 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?

Answer 195) **Neither Agree nor Disagree.**

Question 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

Answer 195) **Neither Agree nor Disagree.**

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

Answer 195) **No.**

Question 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.

Answer 195) Do Not have a view - Neither Agree nor Disagree.

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

Answer 195) Do Not have a view - Neither Agree nor Disagree.

Annex B - Viability: Standardised inputs in viability assessment.

Growth Testing.

Question 200) Would you support the use of growth testing for strategic, multi-phase schemes?

Answer 200) Do Not have a view - Neither Agree nor Disagree.

Question 201) Would you support the optional use of growth testing for regeneration schemes?

Answer 201) Do Not have a view - Neither Agree nor Disagree.

Developer returns: Expectations.

Question 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?

Answer 202) Neither Agree nor Disagree 17.5% if that is the industry standard. See no reason to deviate.

Question 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?

Answer 203) Do Not have a view - Neither Agree nor Disagree.

Question 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?

Answer 204) Do Not have a view - Neither Agree nor Disagree.

Developer returns: Alternative metrics.

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

Answer 205) Do Not have a view - Neither Agree nor Disagree.

Question 206) Do you agree their 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?

Answer 206) Do Not have a view - Neither Agree nor Disagree.

Question 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?

Answer 207) Do Not have a view - Neither Agree nor Disagree.

Benchmark land values: Landowner premiums.

Question 208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances?

Answer 208) Do Not have a view - Neither Agree nor Disagree.

Question 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?

Answer 209) Do Not have a view - Neither Agree nor Disagree.

Question 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?

Answer 210) Do Not have a view - Neither Agree nor Disagree.

Benchmark land values: Market evidence.

Question 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?

Answer 211) Do Not have a view - Neither Agree nor Disagree.



Question 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.

Answer 212) **Do Not have a view - Neither Agree nor Disagree.**

Annex C - Reforming Site Thresholds.

Implementation of new medium category in the Framework.

Question 213) Do you agree that a 2.5-hectare threshold is appropriate?

Answer 213) **Strongly Agree - We strongly agree a threshold of 2.5 ha. This complies with the London Plan SPG.**

We would also recommend that the “National Model Design Codes & Guidance” Parts 1 & 2 be referenced for spatial guidance and threshold between ‘Area Types’.

Part 1 of the NMDC&G at Section 2.B page 14 defines **Area Types:**

Rural Area Type	<20 Units/ha
Outer Suburban Area Type: -	20 Units/ha to 40 Units/ha
Suburban Area Type: -	40 Units/ha to 60 Units/ha
Urban Area Type: -	60 Units/ha to 120 Units/ha
Central/Town Area Type: -	≥120 Units/ha and above

Question 214) Do you agree that a unit threshold of between 10 and 49 units is appropriate?

Answer 213) **Disagree.**

The National Model Design Code ‘Area Type’ Indicates 20 - 40 (Not 49) Units/ha as ‘Outer Suburban’. ‘Suburban’ ‘Area Type’ is 40 to 60 Units/ha.

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

Answer 215) **Do Not have a view - Neither Agree nor Disagree.**

Implementation of new medium category outside the Framework.

No Questions Posed.

Implementation of new medium category in regulations Building Safety Levy.



Question 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?****

Answer 217) Do Not have a view - Neither Agree nor Disagree.

Question 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?

Answer 218) Do Not have a view - Neither Agree nor Disagree.

Question 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.

Answer 219) Do Not have a view - Neither Agree nor Disagree.

Question 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.

Answer 220) Do Not have a view - Neither Agree nor Disagree.

Question 221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption?

Answer 221) Do Not have a view - Neither Agree nor Disagree.

Uplifting the Permission in Principle threshold.

Question 222) Do you agree with the proposal to extend the Permission in Principle application route to medium development?

Answer 222) Do Not have a view - Neither Agree nor Disagree.

Question 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?

Answer 223) Agreed – there should be a short Planning Statement.

Development Management Procedure Order.

No Questions Posed.



Public Sector Equality Duty.

Question 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?

Answer 224) Do Not have a view - Neither Agree nor Disagree.

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

Answer 225) Do Not have a view - Neither Agree nor Disagree.

This completes MORA's responses to questions.

See Appendix A for Croydon Area Residents' Associations (CARA) for amended answers, deletions and endorsements.

Kind Regards



Derek C Ritson I. Eng M I E T

MORA Executive Committee - Planning

Planning@mo-ra.co

Appendix A.

Croydon Area Residents' Association (CARA).

MORA Update:

Question 1 Providing for these policies to bear on the system from day one, by requiring that any inconsistent local policies are immediately given **very limited weight**.

Answer 1 **Party Agree.**

Need to clarify or define **“very limited weight”** as it is too subjective to varying interpretation. Any quantity could be considered of **‘Limited weight’ and is therefore ‘meaningless.’**



Derek Ritson - MORA
MORA Planning

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Comment Response from: Chair of the Caterham Flood Action Group (affiliated to the National Flood Forum), representing flood victims of Caterham on the Hill and Old Coulsdon.

Question 172 Do you agree with the proposed clarifications to the sequential test set out in policy F5?

Answer 172 **Partly disagree.**

Reasons:

The proposed clarifications do not resolve fundamental problems with the application of the sequential test. The test is primarily a plan-making tool and has limited practical value at the decision-making stage, where applicants cannot realistically relocate development to alternative sites they do not control.

The policy introduces the concept of a “catchment” without defining it, creating ambiguity and scope for challenge. Catchments are critical to understanding flood risk, particularly from surface water and groundwater, as development upslope can materially increase risk elsewhere unless commensurate sustainable drainage is applied across the whole catchment.

The sequential test should be clearly framed as a plan-making tool and applied at the topographic catchment scale, with “catchment” defined in the glossary.



Question 173 Do you agree with the proposed approach to the exception test set out in policy F6?

Answer 173 **Partly disagree.**

Reasons:

The proposed approach continues to allow development in areas at risk of flooding, particularly from surface water and groundwater, which are inadequately reflected in current flood zone classifications.

Strategic flood risk assessments are often too generic to address the detailed, technical drainage and SuDS considerations required at application stage. Development may therefore pass the exception test while still increasing flood risk elsewhere within the catchment.

Surface water and groundwater flooding must be explicitly included, and the exception test should only be met where commensurate sustainable drainage measures demonstrably manage flood risk both on-site and off-site over the lifetime of the development, informed by specialist consultees including the LLFA.

Question Q174 **Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?**

Answer 174 **Strongly agree.**

Reasons:

Designing sustainable drainage systems in accordance with National Standards is essential to managing flood risk.

However, this requirement should apply to all developments, not only major schemes.

In many areas, flood risk is driven by the cumulative impact of small-scale and infill development, which can readily incorporate proportionate, low-cost SuDS measures.

Restricting robust SuDS requirements to major development alone fails to address this cumulative risk. Lead Local Flood Authorities should also be consulted below major development thresholds where cumulative impacts are evident.

Question 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?

Answer 175 **Strongly agree.**

Reasons:



Avoiding culverting and promoting de-culverting and re-naturalisation deliver clear flood risk and environmental and benefits. Restoring natural watercourses increases flow capacity, slows runoff, and supports sustainable, catchment-based flood management.

This approach is particularly important in heavily developed catchments where historic culverting has increased flood risk and should be supported by strong safeguards to prevent future re-enclosure.

Question 178 Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications?

Answer 178 Partly disagree.

Reasons:

The proposed additions to Table 2 improve clarity for certain development types but remain insufficient, as vulnerability classifications continue to be framed primarily around fluvial and tidal flooding.

This approach does not reflect the dominant sources of flood risk in many areas, including surface water flooding, groundwater emergence, sewer exceedance, and cumulative development impacts within catchments. As a result, development may be classified as low or less vulnerable despite being demonstrably unsafe over its lifetime or increasing flood risk elsewhere.

To align Table 2 with the objective of Chapter 18 and established evidence, the following should be explicitly included or reclassified:

- Residential development, including redevelopment and intensification, in areas of known or modelled surface water flood risk, which should be treated as highly vulnerable irrespective of Flood Zone.
- Critical infrastructure dependent on uninterrupted operation (e.g. electricity, water etc) in areas susceptible to surface water flooding.
- Development that increases impermeable area within upper or contributing catchments, including small-scale infill and intensification, where cumulative impacts materially increase flood risk.
- Development within Groundwater Source Protection Zones, where flood mitigation measures may compromise aquifer protection.

Without these clarifications, Table 2 risks underestimating vulnerability, increasing reliance on interpretation at decision-making stage, and enabling development that conflicts with the requirement for proposals to be safe for their lifetime and not increase flood risk elsewhere.

Chair of the Caterham Flood Action Group

Julie Blackburn

julieblackburn68@yahoo.co.uk

Comment Response from: Chairman - Whitgift Residents' Association:

Chapter 12: Making effective use of land.

Plan-making policy.

L1: Planning for an Effective Use of Land.

Question 114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?

Answer 114) **Strongly disagree.**

There is no basis for this policy, and no evidence is included to support concluding that filling gaps in the prevailing roof line, the redevelopment of low-density residential plots, introducing higher buildings at street corners and infill development within residential curtilages are compatible with the 'importance of securing well designed, attractive and healthy places'.

Policy L1 is unclear except in its aim to encourage densification, quite possibly to the detriment of existing residents. In particular L1:1a iv in the draft text refers to "the desirability of maintaining an area's prevailing character" which is encouraging but then ends with "*or of promoting regeneration and change,*" i.e. effectively enabling any claim for maintaining an area's character to be defeated in the name of regeneration and high-density levels.

L2: Making effective use of land.

Question 116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?

Answer 116) **Strongly disagree.**

a) Policy L2 does not provide clear guidance on how development proposals should be assessed to ensure efficient use of land. The policy wholly fails to acknowledge that efficient use of land is one among many material planning considerations. It may not be the determining consideration. The Policy is incompatible with the requirement to consider each application on its merits.

Question 117) Do you agree policy L2 identifies appropriate typologies of development to support intensification?

Answer 117) **Strongly disagree.**

a) Policy L2 identifies “appropriate typologies” of development to support intensification but does not explain why they are being proposed. What is the evidence base? Why are they considered “appropriate”? Without justification they should be removed. The typologies are just examples of ways to achieve intensification.

Question 118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?

Answer 118) **Strongly disagree.**

a) These principles are vague in that reference is made to “*sensitive redevelopment*” and “*acceptable living standards.*” These are not clear principles which are suitable for national policy – they are woolly and can mean anything a developer or local authority wishes them to mean.

Question 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.

Answer 119) **Strongly disagree.**

a) L2 (d)(i) refers to “*appropriate*” development. This is vague and meaningless and can be used to justify any application regardless of the harm it might do to the overall street scene.

Question 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.

Answer 120) **Strongly disagree.**

a) The proposed safeguards in policy L2 that allow development in residential curtilages are not in fact safeguards at all as there is no benchmark provided against which harm can be measured. It is simply a case of it being a good thing because policy says so.

L3: Achieving Appropriate Densities

Question 121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?

Answer 121) **Strongly disagree.**

Policy L3 does not provide guidance at all. Policy L3 dictates that “The existing character of an area should be taken into account, in accordance with policy

DP3, but should not preclude development which makes the most of an area's potential." It completely disregards the fact that each case will be different.

What is the point of taking the existing character into account when policy states that it cannot lead to an application's refusal? The unfairness of the policy is further emphasised by Policy L3(3) which sets arbitrary density standards. Furthermore, Policy L3(4) unequivocally states that "Development proposals that do not make efficient use of land in accordance with this policy should be refused". It clarifies that the existing character of an area should be taken into account but not preclude development proposals that maximise site potential. It is important to note the use of the term 'maximise' rather than 'optimise.'

In other words, the proposed policy enables a local authority to accept any application for redevelopment regardless of harm to the existing residents, as long as minimum density levels are met.

Policy L3 permits any authority to do what it wants in the name of regeneration and minimum density levels. Policy L3 should be scrapped and completely redrafted.

L4: Residential Extensions.

Question 128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?

Answer 128) **Strongly disagree.**

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

Policy L4 and its subject matter, residential extensions, should not be the subject of the National Planning Policy Framework (NPPF).

Answer 129) **Strongly disagree.**

The guidance is prescriptive; is not high level but basic. Residential extensions should be a matter solely for a local planning authority.



**Monks Orchard Residents' Association (MORA)
Submission, endorsed by members of Croydon Area
Residents' Associations (CARA) and others, as follows:**

Derek Ritson I. Eng. M I E T. (Retired) Planning@mo-ra.co	Monks Orchard Residents' Association - Committee Member - Planning
Julie Blackburn julieblackburn68@yahoo.co.uk	Chair of the Caterham Flood Action Group (Affiliated to the National Flood Forum).
Jennifer Sturdy jcs64uk@yahoo.com	Coulsdon West Residents 'Association (CWRA) - Chair
Richard Walker richard.333vincent@talktalk.net	Coulsdon West Residents 'Association (CWRA) Deputy Chairman & Planning
Phil Thomas MRICS (Retired) philgthomas@googlemail.com	Vice Chairman & Planning Committee Member, Riddlesdown Residents' Association
Ian Leggatt ian.leggatt@btinternet.com	Planning Committee Member, Selsdon Residents' Association
Charles King king.charles@talktalk.net	Chair - East Coulsdon Residents' Association
Julian Roberts julian.roberts@springparkra.co.uk	Chair - Spring Park Residents' Association
Michael Seabrook chairocra@outlook.com	Planning Committee Member – Old Coulsdon Residents' Association
Colin Etheridge cmetheridge@yahoo.co.uk	Planning Committee Member - Hartley & District Residents' Association
Geoff James planning@kenleyra.org.uk	Planning Committee Member - Kenley & District Residents' Association
Ian Leonard i.c.leonard@outlook.com	Planning Committee Member – Longheath & Long Lane Residents' Association

**Representing, supporting, and working with the local residents
for a better community**



<p>Jim Gibbons Jim Gibbons queenstreet1962@gmail.com</p>	<p>Vice Chairman - Sanderstead Residents' Association</p>
<p>Gerry Meredith-Smith gpms@btinternet.com</p>	<p>Chairman - Whitgift Residents' Association</p>
<p>Ngairé Sharples Hello@mo-ra.co</p>	<p>Secretary Monks Orchard Residents' Association (MORA)</p>

End of submission