

<p><b>Preamble</b></p>	<p>These comments are an organisational response on behalf of the Chiltern Society. The Society has over 7,000 members, seeking to protect the special qualities of the Chilterns. Our geographical area of interest is the Chiltern Natural Area - a 650 square mile area across parts of four English counties: Oxfordshire, Buckinghamshire, Hertfordshire, and Bedfordshire – both the countryside and the settlements within it. Almost exactly half of this area forms the Chilterns Area of Outstanding Natural Beauty. It also contains extensive areas of Green Belt, some of which is coincident with the AONB, but much of it is not.</p>
<p><b>Question 1</b></p> <p>Do you agree with the proposals to:</p> <p>a) Make clear in the National Planning Policy Framework that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the Framework, with an additional requirement to plan for the allocations needed to deliver the area’s housing requirement?</p> <p>b) Use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?</p> <p>c) Revise the National Planning Policy Framework to tighten the definition of what evidence is required to support a ‘sound’ plan?</p> <p><b>Question 2</b></p> <p>What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together?</p>	<p>a) Yes, as long the strategic policies maintained is the complete list from NPPF para 156 – in footnote 88, the list ostensibly transferred from NPPF 156 omits “the provision of health, security, community and cultural infrastructure and other local facilities”; this may just have been an oversight rather than deliberate. Whichever, it needs reinserting.</p> <p>We also observe that, although the proposed split of having core policies and site allocations in one document, and more detailed and subsidiary policies in another, seems reasonable, this is the third variant advocated in the last 15 years. This constant state of flux is one of the causes of delay in producing Local Plans, so after these changes there needs to be a period of stability.</p> <p>b) No comment</p> <p>c) Yes, the proposals for a revised soundness test and more proportionate evidence base are sensible; but the stipulation that plans and policies in different documents should not duplicate each other should be applied with a light touch, since a degree of duplication is better than inadvertent omission.</p> <p>2. No comment</p>

<p><b>Question 3</b></p> <p>Do you agree with the proposals to:</p> <p>a) amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?</p> <p>b) from early 2018, use a standardised approach to assessing housing requirements as the baseline for five year housing supply calculations and monitoring housing delivery, in the absence of an up-to-date plan?</p>	<p>a) Yes</p> <p>b) No.</p> <p>Although there are benefits to having a more transparent and more easily understood method for assessing housing requirements, that a standardised method might provide, in the absence of the promised consultation, it is impossible to know if it would yield fair or reasonable outputs.</p> <p>But in any case, April 2018 is too soon for a revised baseline to apply, since, even if the details of the standardised methodology were known now, it gives insufficient time for planning authorities to make adjustments to evolving Plans which might already be at an advanced stage of preparation. A period of 2 years from the date of introduction of a standardised method would be more appropriate.</p> <p><b>If the idea of a standardised assessment method is to be taken forward, it is imperative that the consultation on the details begins urgently.</b> Otherwise, far from being an incentive to get plans in place (para 1.15), the uncertainty is holding back planning authorities from finalising Plans.</p> <p>The White Paper’s use of the term “housing requirements” (rather than “housing needs”) means it is also not clear whether the proposed standardised approach will relate just to assessing the headline policy-off needs figure as Strategic Housing Market Assessments do now, or extend to translating this into actual housing targets after constraints and other factors have been taken into account. Whatever the details of the process, it is absolutely essential that it allows for housing targets in areas constrained by AONB and Green Belt to be set lower, in order to give meaningful and effective protection to these areas. This should especially</p>
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	<p>apply where neighbouring local authorities are similarly constrained, and thus the scope for transfer across boundaries does not exist.</p>
<p><b>Question 4</b></p> <p>Do you agree with the proposals to amend the presumption in favour of sustainable development so that:</p> <p>a) authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?;</p> <p>b) it makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?;</p> <p>c) the list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the National Planning Policy Framework (so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?</p> <p>d) its considerations are re-ordered and numbered, the opening text is simplified and specific references to local plans are removed?</p>	<p>a) No comment, because it is not clear what this means in practice.</p> <p>b) We cannot support the proposed wording because it is ambiguous, so the government's intentions are unclear, and it will also inevitably cause problems of interpretation.</p> <p>The problem arises from the introduction of the word "strong". Is the intended meaning that a conflict with the listed policies in itself and always provides a strong reason for restricting development? Or that conflict with those policies only provides a reason for restricting development if the degree of conflict is strong?</p> <p>Because the proposed wording is open to these two very different interpretations, it is clearly unsatisfactory, and needs amending to better articulate whatever is intended.</p> <p>Our opinion is that the first scenario is the appropriate one, i.e. needs should not have to be accommodated during plan-making where there is conflict with the listed policies, in which case the word "strong" in the NPPF wording is superfluous.</p> <p>c) We strongly support the addition to footnote 9 of policies relating to ancient woodland and veteran trees.</p> <p>However, we believe that strictly limiting the list of NPPF policies which might restrict development to the specified list, when read alongside the pro-development slant of the "significantly and demonstrably outweigh..." test, goes too far, meaning, for example, that playing fields, "lower-tier" wildlife sites and heritage assets, land with mineral stocks, amongst others, would be less protected than the NPPF intends; a better balance might be to begin the</p>

	<p>footnote with the words “Particularly policies relating to... “</p> <p>d) Yes</p>
<p><b>Question 5</b></p> <p>Do you agree that regulations should be amended so that all local planning authorities are able to dispose of land with the benefit of planning consent which they have granted to themselves?</p>	<p>Rightly or wrongly, there is an inevitable perception that local planning authorities are unlikely to refuse permission for applications made to themselves. The financial pressures they face will also make the prospect of income from land sales an attractive one. For these reasons, these amended regulations should only apply to sites that have been allocated through the Local Plan process or another route involving an element of independent scrutiny, and not to “speculative” applications.</p>

<p><b>Question 6</b></p> <p>How could land pooling make a more effective contribution to assembling land, and what additional powers or capacity would allow local authorities to play a more active role in land assembly (such as where ‘ransom strips’ delay or prevent development)?</p>	<p>No comment</p>
<p><b>Question 7</b></p> <p>Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard?</p>	<p>Yes</p>
<p><b>Question 8</b></p> <p>Do you agree with the proposals to amend the National Planning Policy Framework to:</p> <p>a) highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing?;</p> <p>b) encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the authority’s housing needs?;</p> <p>c) give stronger support for ‘rural exception’ sites – to make clear that these should be considered positively where they can contribute to meeting identified local housing needs, even if this relies on an element of general market housing to ensure that homes are genuinely affordable for local people?;</p>	<p>a) Yes with proviso – the proviso being that sufficient attention and weight is given to the range of reasons why small sites may not be suitable (including biodiversity, impact on character). This note of caution also applies to the wider changes putting greater emphasis on small sites set out at para A52, but the danger is perhaps greater at the Neighbourhood Plan level where there may be less familiarity and awareness of these wider policy objectives.</p> <p>b) Could be good or bad, depending on its interpretation. And in all cases the scale of development should be proportionate, so that the existing community is not overwhelmed, and the character of the settlement irrevocably changed.</p> <p>c) Although, in general, we would be supportive of appropriate rural exceptions schemes which meet genuine local need for affordable housing, we cannot support this proposal when read alongside the proposed changes to the definition of affordable housing, which are taking away the “in perpetuity” element that in our opinion is</p>

<p>d) make clear that on top of the allowance made for windfall sites, at least 10% of sites allocated for residential development in local plans should be sites of half a hectare or less?;</p> <p>e) expect local planning authorities to work with developers to encourage the sub-division of large sites?; and</p> <p>f) encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly?.</p>	<p>essential to provide the justification for making such exceptions to normal planning rules.</p> <p>Of even more concern is the proposal to allow an element of market housing. This surely undermines both the principle and practice of rural exceptions schemes, which rely on low land prices for their viability – the prospect of getting permission for some market housing on “protected sites” on the back of some affordable provision will undoubtedly inflate land-prices, removing one of the financial planks that 100% affordable schemes depend on.</p> <p>d) We support the idea of facilitating smaller schemes, and the allocation of smaller sites may be one way of doing this. But a specific figure may be too prescriptive. And is the intention that 10% of sites should be half a hectare or less [so, for example, one site of 0.4ha and 9 sites of 100ha would meet the test], or that 10% of the dwellings should come from small sites? – more guidance is needed about intention and how to apply it.</p> <p>e) Yes</p> <p>f) No comment</p>
<p><b>Question 9</b></p> <p>How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?</p>	<p>No comment.</p>

### Question 10

Do you agree with the proposals to amend the National Planning Policy Framework to make clear that:

a) authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?

b) where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality or accessibility of remaining Green Belt land?

a) No, not as drafted.

In our answer to Question 4, we set out our view that Green Belt which is still fulfilling its purpose should be a legitimate reason for restricting the amount of development to be accommodated. So, as well as making clear that all other reasonable options must be examined before Green Belt is even looked at, a revised NPPF must distinguish between an obligation to review, and an obligation to amend - the precise wording of the NPPF and guidance is therefore crucial.

Whatever the intentions of the Government, 8 out of 10 local authorities in the Chilterns area that we cover have interpreted the existing wording as a positive instruction to review and amend Green Belt, and it is vital that the same confusion does not arise again. We believe the use of the phrase “should amend Green Belt boundaries” risks perpetuating this misinterpretation, and better wording would be “may review Green Belt” – and that elsewhere wording is added to make clear that a review may result in a decision to make no changes, even where full needs cannot be met.

We also point out that the “option” of exploring whether other authorities can “help to meet some of the identified development requirement” is of little practical relevance or help where a number of adjoining local authorities are all constrained by Green Belt or other factors, and it is in situations like these that it must be allowable to restrict housing numbers to avoid unacceptable incursions into the Green Belt.

b) No, neither necessary nor appropriate.

Paragraph 81 of the NPPF already requires local planning authorities to do these things.

<p>c) appropriate facilities for existing cemeteries should not to be regarded as 'inappropriate development' in the Green Belt?</p> <p>d) development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt?</p> <p>e) where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan (or plans) for the area in question?</p> <p>f) when carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs?</p>	<p>In any case, the contribution that Green Belt makes by virtue of its openness is separate and distinct from any other contribution arising from its environmental quality or accessibility, so it is false to imply the loss of one can ever be fully offset by a gain in another.</p> <p>c) No comment – on the presumption that the government has no choice in this matter.</p> <p>d) No</p> <p>e) No – Green Belt is a strategic tool, so decisions about any amendment need to be taken at a strategic level. Neighbourhoods are not equipped to assess wider contributions to Green Belt purposes.</p> <p>There also would be major complexities and challenges in practical implementation: how does one define / distinguish “changing general extent” / “determination of detailed boundary”; would a neighbourhood be given a specific acreage of GB to lose / or could they lose as much or as little as they liked?</p> <p>f) No – although these are factors to be taken into account, they should not substitute for or override considerations of openness or wider contributions to Green Belt purposes.</p>
<p><b>Question 11</b></p> <p>Are there particular options for accommodating development that national policy should expect authorities to have explored fully before Green Belt boundaries</p>	<p>No comment</p>

<p>are amended, in addition to the ones set out above?</p>	
<p><b>Question 12</b></p> <p>Do you agree with the proposals to amend the National Planning Policy Framework to:</p> <p>a) indicate that local planning authorities should provide neighbourhood planning groups with a housing requirement figure, where this is sought?;</p> <p>b) make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) are expected to set out clear design expectations; and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals?;</p> <p>c) emphasise the importance of early pre-application discussions between applicants, authorities and the local community about design and the types of homes to be provided?;</p> <p>d) makes clear that design should not be used as a valid reason to object to</p>	<p>a) Yes, in principle, it would be helpful for Neighbourhoods to have more and earlier information about how many dwellings they have to choose sites for.</p> <p>But there are considerable practical difficulties in applying this: how could it be done reliably or appropriately ahead of finalising the local plan: unless the overall need was simply split prorata, which would mean holistic assessment of suitability of land across the District as a whole would not take place; and, potentially, unless the methodology made some allowance for this, GB / AONB-constrained Neighbourhoods would get equivalent requirement to unconstrained ones.</p> <p>b) We very much welcome a greater focus on design, whilst noting that design is to some extent a subjective issue.</p> <p>There are examples from Europe and the UK where innovative community-led design delivers high-quality and high-density development in urban locations, and appropriate initiatives of this kind should be encouraged within any design codes and policies.</p> <p>c) No comment</p> <p>d) This would mean it is vitally important to get the expectations in the Plan right, so yes, as long as there are proper opportunities for</p>

<p>development where it accords with clear design expectations set out in statutory plans?; and</p> <p>e) recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be reflected in plans and given weight in the planning process?</p>	<p>input at the Plan-making stage.</p> <p>e) Yes</p>
<p><b>Question 13</b></p> <p>Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:</p> <p>a) make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?;</p> <p>b) address the particular scope for higher-density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?;</p> <p>c) ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?;</p> <p>d) take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?</p>	<p>We believe that national policy should limit itself to general encouragement of higher densities when appropriate and when consistent with good design, but leave the detailed decisions to the local level. Our answers to Q13 and 14 reflect this view.</p> <p>a) Just a reference to making efficient use of land will suffice, with the remainder of the wording deleted: high density can be appropriate even when there is no shortage of land, and even where land is in short supply, high density should not be at the expense of good design.</p> <p>b) These situations should be given as examples, not as prescriptive requirements – local planning authorities need to have flexibility to take into account local circumstances.</p> <p>c) Yes</p> <p>d) Although there could certainly be situations where the wider availability of open space is relevant to the level of on-site provision, this flexibility should be incorporated in the wording of local policies, i.e. at the policy-setting stage, not in how they are applied. It may be a pedantic point, but it would be a slippery slope to vary on a case-by-case basis how policies are applied.</p>

<p><b>Question 14</b></p> <p>In what types of location would indicative minimum density standards be helpful, and what should those standards be?</p>	<p>We don't believe that indicative density standards are helpful, but, certainly, any that are set should be set locally.</p>
<p><b>Question 15</b></p> <p>What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning (using tools such as policy, local development orders, and permitted development rights)?</p>	<p>There may be opportunities for more intensive use of existing public sector sites or in urban locations more generally. But equally this is not always the case, and there is a real risk of taking this policy of intensification too far: green space, and a bit of space generally, is necessary for an acceptable urban living environment. Because there are these other legitimate considerations, a permitted development route would definitely not be appropriate.</p> <p>Also we are not sure in what way current policy is perceived as a barrier to appropriate applications of this sort on public sector sites; so might it be changes outside the planning system, for example widening the remit and powers of public bodies, that are needed?</p>
<p><b>Question 16</b></p> <p>Do you agree that:</p> <p>a) where local planning authorities wish to agree their housing land supply for a</p>	<p>It is certainly wrong that local planning authorities have to repeatedly argue about the 5-year land supply position at every appeal. But the remedy proposed seems over-bureaucratic, and it is not clear how it will meaningfully reduce workload. In our view the process of establishing an "officially-recognised" land supply position should be something that can easily follow on after the assessment exercise they do already, for example by perhaps simply having the SHLAA or an Annual Monitoring Report "audited" by the Inspectorate.</p> <p>And we can see absolutely no logic or justification in having to add a 10% buffer in return.</p> <p>So, to answer the specific questions:</p> <p>a) No, definitely not.</p>



<p>65% (25% in 2018; 45% in 2019) for the wider authority area?</p> <p>c) should it remain a requirement to have site allocations in the plan or should the protection apply as long as housing supply policies will meet their share of local housing need?</p>	<p>c) Either scenario should suffice.</p>
<p><b>Question 18</b></p> <p>What are your views on the merits of introducing a fee for making a planning appeal? We would welcome views on:</p> <p>a) how the fee could be designed in such a way that it did not discourage developers, particularly smaller and medium sized firms, from bringing forward legitimate appeals;</p> <p>b) the level of the fee and whether it could be refunded in certain circumstances, such as when an appeal is successful; and</p> <p>c) whether there could be lower fees for less complex cases.</p>	<p>We support the introduction of a fee for making a planning appeal. A significant proportion of the fee should go to the local authority to go towards the costs they incur.</p> <p>a) and c) It should be tiered so that more complex or larger-scale developments attract larger fees.</p> <p>b) Where an appeal is successful, the fee should be refunded.</p>
<p><b>Question 19</b></p> <p>Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?</p>	<p>No comment</p>
<p><b>Question 20</b></p> <p>Do you agree with the proposals to amend national policy so that:</p> <ul style="list-style-type: none"> <li>• the status of endorsed recommendations of the National Infrastructure Commission is made clear?; and</li> <li>• authorities are expected to identify the additional development opportunities which strategic infrastructure improvements offer for making additional land available for housing?</li> </ul>	<p>Only partly. It is wrong to suggest that additional housing and other development should arise almost as a matter of course from strategic infrastructure improvements, as this does. The improved infrastructure will be a factor to be taken into account, but there may be other reasons why allocating more land for development would not be appropriate. The wording of the second bullet should be amended accordingly, by, at the very least, inserting “may” before “offer”.</p>

	<p>This proposal also means that ensuring and enabling greater public involvement in NIC decisions is all the more important; and that as part of this engagement process the NIC should consult explicitly on the other development which might accompany or follow on from infrastructure projects.</p>
<p><b>Question 21</b></p> <p>Do you agree that:</p> <p>a) the planning application form should be amended to include a request for the estimated start date and build out rate for proposals for housing?</p> <p>b) that developers should be required to provide local authorities with basic information (in terms of actual and projected build out) on progress in delivering the permitted number of homes, after planning permission has been granted?</p> <p>c) the basic information (above) should be published as part of Authority Monitoring Reports?</p> <p>d) that large housebuilders should be required to provide aggregate information on build out rates?</p>	<p>More information and transparency from developers would be welcome and useful. But when the ostensible purpose of this and subsequent proposals is to “hold developers to account for the delivery of homes” there need to be measures targeted at the developers, either penalising them for slow delivery or incentivising them for faster delivery, and thereby making a difference on the ground. Simply asking for more information will not do this – and, indeed, if one were to take the view that it might be in developers’ interests to force the local authority to allocate more land, this actually provides an opportunity for them to do so by lengthening build-out rates, thus reducing the 5-year supply figure that the local authority can claim.</p> <p>Similar criticisms apply to the measures covered under Questions 22-24; we provide ideas for more effective sanctions within our answer to Q25.</p>
<p><b>Question 22</b></p> <p>Do you agree that the realistic prospect that housing will be built on a site should be taken into account in the determination of planning applications for housing on sites where there is evidence of non-implementation of earlier permissions for housing development?</p>	<p>Unless there were some magical power to transfer permission to another developer who would speedily implement it, this will not actually speed up delivery. Moreover, it would have the perverse effect of actually reducing 5-year land supply, and forcing the local authority to release more land, thus penalising the local authority to a greater extent than the developer.</p> <p>See Q25 for ideas for more effective sanctions</p>
<p><b>Question 23</b></p>	<p>This proposal has the same problems of ineffectiveness and perverse consequences as that covered in Q22.</p>

<p>We would welcome views on whether an applicant's track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development.</p>	<p>But, additionally, the subjective nature of such a decision by a local authority would also be ripe for appeal or even legal challenge, so it is likely to be unworkable in practice.</p> <p>See Q25 for ideas for more effective sanctions</p>
<p><b>Question 24</b></p> <p>If this proposal were taken forward, do you agree that the track record of an applicant should only be taken into account when considering proposals for large scale sites, so as not to deter new entrants to the market?</p>	<p>No view offered, because we do not think the proposal should be taken forward.</p>
<p><b>Question 25</b></p> <p>What are your views on whether local authorities should be encouraged to shorten the timescales for developers to implement a permission for housing development from three years to two years, except where a shorter timescale could hinder the viability or deliverability of a scheme? We would particularly welcome views on what such a change would mean for SME developers.</p>	<p>Not sure if / how this would speed up delivery, since developers might simply delay putting in the application to fit in with the timescale envisaged anyway. However we would support the idea of a shortened implementation period being available to local planning authorities to use at their discretion.</p> <p>Here we would like to suggest alternative ideas for speeding up delivery by developers. These should be a mix of incentives for speedy delivery and punitive measures for failure to deliver within a reasonable period.</p> <p>The incentive could be a reduction in the level of CIL contribution if completion occurred within, say, 18 months of permission. The reduction in income for infrastructure could be cushioned by a change to the New Homes Bonus system mandating that it is used specifically for infrastructure spending.</p> <p>The punitive measure could be the charging of a sum equivalent to the council tax liability on any homes not delivered within, say 3 years of permission (unless extended phasing agreed as part of the permission).</p>

<p><b>Question 26</b></p> <p>Do you agree with the proposals to amend legislation to simplify and speed up the process of serving a completion notice by removing the requirement for the Secretary of State to confirm a completion notice before it can take effect?</p>	<p>We do not have specialist knowledge of this subject, but support any change which reduces unnecessary bureaucratic burdens on local planning authorities.</p>
<p><b>Question 27</b></p> <p>What are your views on whether we should allow local authorities to serve a completion notice on a site before the commencement deadline has elapsed, but only where works have begun? What impact do you think this will have on lenders' willingness to lend to developers?</p>	<p>No comment</p>
<p><b>Question 28</b></p>	<p>The whole premise of the housing delivery test is flawed, in that it involves sanctions against LPAs for something that is not wholly within their power to control. The 5-year land supply rules provide sufficient sanction against dilatory LPAs, since allocating land IS within their control. We therefore urge the government to reverse its decision to introduce such a test.</p> <p>But should the proposal be taken forward, it is also unreasonable to apply sanctions until sufficient time has been given to adapt to all the imminent changes to policy and guidance, and get a compliant plan in place. That way, the baseline for the test can always be the housing requirement set out in the plan, which is the fairest measure since that will have been arrived at after due consideration of need, constraints, deliverability etc. Otherwise, local authorities with Green Belt / AONB / other constraints will be unfairly penalised since the proposed baselines of household projections then standard methodology for assessing need will inevitably be higher than existing and likely future targets.</p> <p>Since a key ingredient in the suite of changes proposed is a new</p>

<p>Do you agree that for the purposes of introducing a housing delivery test, national guidance should make clear that:</p> <p>a) The baseline for assessing housing delivery should be a local planning authority's annual housing requirement where this is set out in an up-to-date plan?</p> <p>b) The baseline where no local plan is in place should be the published household projections until 2018/19, with the new standard methodology for assessing housing requirements providing the baseline thereafter?</p> <p>c) Net annual housing additions should be used to measure housing delivery?</p> <p>d) Delivery will be assessed over a rolling three year period, starting with 2014/15 – 2016/17?</p> <p><b>Question 29</b></p> <p>Do you agree that the consequences for under-delivery should be:</p> <p>a) From November 2017, an expectation that local planning authorities prepare an action plan where delivery falls below 95% of the authority's annual</p>	<p>standard methodology for assessing housing requirements, it follows that any housing delivery test should not be introduced until sufficient time has been given to review and update local plans to reflect its outcome - we suggest 2 years from the date of introduction of a standardised method would be appropriate.</p> <p>So, to answer the specific questions, all with the proviso that we oppose the housing delivery test in principle:</p> <p>28a) Yes, and sufficient time needs to be given for all authorities to produce an up-to-date plan which takes account of the new methodology for housing requirements and all other imminent changes to policy</p> <p>28b) No, the baseline should always be the adopted housing requirement in the local plan, with the housing delivery test not introduced until 2 years after the introduction of the standardised method of assessing need. Only after that should the new standard methodology for assessing housing requirements be used as the baseline.</p> <p>28c) Yes</p> <p>28d) Delivery should be a rolling three year period, except in the first two years of the test, where due allowance should be made for those authorities who have had to make a step-change in housing delivery arising from a revised plan</p> <p>29a)-e) These should be replaced by : from [2 years after the introduction</p>
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<p>housing requirement?;</p> <p>b) From November 2017, a 20% buffer on top of the requirement to maintain a five year housing land supply where delivery falls below 85%?;</p> <p>c) From November 2018, application of the presumption in favour of sustainable development where delivery falls below 25%?;</p> <p>d) From November 2019, application of the presumption in favour of sustainable development where delivery falls below 45%?; and</p> <p>e) From November 2020, application of the presumption in favour of sustainable development where delivery falls below 65%?</p>	<p>of the standardised method of assessing need]: application of the PFSD where delivery falls below 65% (of the authority's annual housing requirement in an adopted local plan, or in the absence of an up-to-date plan, the new standardised methodology for assessing housing requirements.)</p>
<p><b>Question 30</b></p> <p>What support would be most helpful to local planning authorities in increasing housing delivery in their areas?</p>	<p>A period of guaranteed stability in planning policy</p>
<p><b>Question 31</b></p> <p>Do you agree with our proposals to:</p> <p>a) amend national policy to revise the definition of affordable housing as set out in Box 4?;</p> <p>b) introduce an income cap for starter homes? [see under 4.13 – 4.21];</p> <p>c) incorporate a definition of affordable private rent housing?;</p>	<p>a) No, we oppose the inclusion within the definition of affordable housing of any category of housing which does not remain affordable in perpetuity either through permanent residence requirements and / or recycling of subsidy. We thus specifically oppose the inclusion of starter homes, which does not meet those conditions.</p> <p>b) Yes, but it should be lower than the £80,000 / £90,000 figure proposed so that they are more closely targeted on those in greatest need. (And, as stated above, should not be categorised as affordable housing for the purposes of other policies.)</p> <p>c) Agree</p>

<p>d) allow for a transitional period that aligns with other proposals in the White Paper (April 2018)?</p>	<p>d) No comment</p>
<p><b>Question 32</b></p> <p>Do you agree that:</p> <p>a) national planning policy should expect local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products?</p> <p>b) that this policy should only apply to developments of over 10 units or 0.5ha?</p>	<p>a) Whilst welcoming the removal of a mandatory requirement for starter homes, we believe insisting on a minimum of 10% of affordable home ownership products is too prescriptive, and the mix should be left to the discretion of local planning authorities.</p> <p>b) As stated above, we do not support the policy, but if it is introduced, yes, it should only apply to sites above this size.</p>
<p><b>Question 33</b></p> <p>Should any particular types of residential development be excluded from this policy?</p>	<p>No comment</p>
<p><b>Question 34</b></p> <p>Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18-219 of the National Planning Policy Framework, together constitute the Government's view of what sustainable development means for the planning system in England?</p>	<p>Does "the reference to the three dimensions of sustainable development" mean NPPF paras 7-10? We believe it should, so, subject to this being the case, we agree with the proposal.</p> <p>One way of making these intentions clear would be to amend para 6 to read "The purpose of the planning system is to contribute to the achievement of sustainable development. The description of sustainable development in paragraphs 7-10, plus the policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system."</p>
<p><b>Question 35</b></p> <p>Do you agree with the proposals to amend national policy to:</p>	<p>a) It might be better if the added reference was to "more extreme temperatures" since although the overall change is upwards, a shift</p>

<p>a) Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures?</p> <p>b) Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?</p>	<p>in climatic patterns might lead to colder winter temperatures.</p> <p>b) Yes</p>
<p><b>Question 36</b></p> <p>Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?</p>	<p>Yes</p>
<p><b>Question 37</b></p> <p>Do you agree with the proposal to amend national policy to emphasise that planning policies and decisions should take account of existing businesses when locating new development nearby and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development?</p>	<p>Yes. For absolute clarity, we need to point out there is a mismatch between the proposal set out in A141 which refers to “businesses and other organisations such as churches...” and the consultation question which refers only to businesses. It is the wider application that we support.</p>
<p><b>Question 38</b></p> <p>Do you agree that in incorporating the Written Ministerial Statement on wind energy development into paragraph 98 of the National Planning Policy Framework, no transition period should be included?</p>	<p>Without seeing the precise wording of the amended NPPF, it is impossible to judge its merits or clarity, but that is not out to consultation anyway. On the narrow question of a transitional period, agree that none needed.</p>