

Questions on Proposed reforms to the National Planning Policy Framework and other changes to the planning system

Chobham Parish Council response

Submitted 9 March 2026 (deadline for responses 10 March 2026)

Please note the Parish Council responded to selected questions of this consultation only, via the online questionnaire. Responses submitted were as follows:

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?

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

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

Partly agree. The format is broadly supported, though it is noted that there are some areas of overlap between policy-making and decision-making policies. Some single hybrid-type policies may be clearer and more straightforward.

3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

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

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

Strongly agree.

5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree*

a) Please provide your reasons, particularly if you disagree

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

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

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?
- 8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 9) Do you agree with the role, purpose and content of local plans set out in policy PM2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No
- a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.
- 11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 12) Do you agree with the approach to initiating plan-making in PM7? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree
- 13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 14) Do you agree with the approach to identifying land for development in PM9? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 15) Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

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

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

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

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

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?

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

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

Partly agree. The Parish Council welcomes opportunities for early engagement, but in practice finds that engagement sessions often come at a late stage in the application process, when there is no opportunity for developers to respond to key local priorities or use information gained to help shape proposals. Paragraph 2 appears to suggest community engagement should not be carried out for applications other than major development. Applicants for smaller schemes should not feel restricted from engaging with the community should they wish to do so.

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

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

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

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

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

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.

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

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.

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.

a) If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations.

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

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

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

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

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

Partly agree. The policy is welcomed as a deterrent against commencing development without planning permission (or a lawful development certificate). However, it is unclear how it will be reliably determined whether unauthorised development has been "intentional", and what type or standard of evidence would be required to demonstrate this. Greater clarity may be required to ensure the policy can be applied consistently and fairly. In particular, it would be helpful to understand how "substantial weight" against such development would be applied when a judgement is being made.

Further strengthening of policy against unauthorised development and planning enforcement would be welcomed. For example, where intentional unauthorised development is established, retrospective applications could carry reduced weight in decision-making (as well as the increased fees already being introduced) to ensure the planning system does not reward deliberate or serial non-compliance with planning controls.

The February 2026 report by the Local Government and Social Care Ombudsman "Losing control: complaints about planning enforcement" reflects the Council's concerns about planning enforcement, including years-long delays and unauthorised development becoming lawful by default. These identified issues must be urgently addressed to avoid furthering a two-tier system where only law-abiding individuals comply with planning rules, while those who ignore or avoid them are allowed to act with impunity.

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?

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

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

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

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

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

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

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

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

Strongly disagree. The presumption is likely to unduly tip the planning balance in favour of development that may otherwise be borderline or refused, disproportionately affecting rural areas with poor public transport, less general infrastructure, and less access to services for day to day needs, including schools and healthcare. Villages and rural areas should not be treated with the same blanket approach as cities and towns when it comes to sustainability policies.

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

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

Strongly disagree. The policy is overly broad, effectively undermining local planning and approving any form of development not “substantially outweighed by any adverse effects”. There must be safeguards to ensure development within a settlement is appropriate for the area and suitably located.

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

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

Partly disagree. Some of the terminology in this section is loose and open to different interpretations, e.g. “reasonable walking distance”, “well-related to an existing settlement”.

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

a) Please provide your reasons.

Partly disagree. It is requested that “Limited infilling within groups of houses” is more tightly defined, both in terms of what is meant by “limited” and what constitutes a

“group of houses”. There is a risk of unintended consequences in rural areas, hamlets and villages.

40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.

41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If not, please provide your reasons

Strongly disagree. Protection under this policy should not be contingent upon a neighbourhood plan containing its own housing allocations. Many Neighbourhood Plans do not themselves contain housing allocations to meet their identified requirement, but instead demonstrably support appropriate strategic site allocations made by the local planning authority for the Neighbourhood Planning area. It should be made explicitly clear that these would also qualify for the policy. On a general note, Neighbourhood Planning is about addressing more than the provision of housing units, and there is a risk that concern over housing requirements and allocations may dissuade areas from preparing or updating a Neighbourhood Plan and undermine community participation if there are reduced benefits of doing so.

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

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

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

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

Partly disagree. The phrase “a genuine choice of sustainable transport modes” requires proper definition and a stronger emphasis on transport modes with low environmental impacts. At a minimum there should be: safe, direct and convenient walking and wheeling routes, safe cycling routes and infrastructure that is integrated into wider networks, and frequent, reliable and accessible public transport. The choices should reflect real-world scenarios and current usage patterns rather than being aspirational. This should be secondary to locating development in more sustainable locations with reduced need to travel.

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

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

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

a) Please provide your reasons

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

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

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

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

Partly disagree. In Section 5 of policy HO2, it is not clear why a housing requirement figure is required to be set for a designated neighbourhood planning area, when it is set out in relevant guidance that making provision for housing and allocations through a neighbourhood plan is discretionary rather than mandatory. This risks confusion over how the figure is to be delivered, which body is responsible for housing delivery and monitoring, and any consequences of under-delivery. If this section of the policy is to be retained, it should clarify that any neighbourhood plan area housing figure is set for local plan preparation purposes only, and does not impose a mandatory allocation requirement upon the neighbourhood planning group.

49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

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

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

Partly agree. For better clarity and ease of reference, it is suggested that all policies relating to Traveller Sites are contained in one chapter.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Partly agree. Tenure mix expectations should reflect local requirements in a proportionate way. The threshold could be set lower, e.g. in a village of 4000 population, even a 30-40 home site would represent a significant development and could make a meaningful contribution towards types of homes needed.

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

a) Please provide your reasons

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

Yes. See answer to question 60. A mix of housing types is required in our Parish, to include smaller affordable homes, smaller dwellings suited to older people, and homes to stop younger people being priced out or forced to move away. A site threshold as high as 150 homes risks continued under-delivery of the homes that area really needed in rural villages.

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

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

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

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

Partly disagree. There would be a risk of large market housing and smaller affordable homes on a development site, against “tenure blind” principles and contrary to creating mixed, inclusive communities.

65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

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?

a) If so, what changes would be beneficial?

67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

Strongly disagree. applicants should not have discretion to provide cash payments. On-site provision is essential to creating mixed, inclusive communities and avoiding

segregation of affordable and market housing. Financial contributions risk concentrating affordable housing elsewhere and undermining social cohesion. This approach would also place an undue burden on the local planning authority. On-site delivery should remain the default expectation.

Cash contributions should not be appropriate where the Golden Rules apply. The provision of affordable homes on such sites is intended to help offset the loss of a Green Belt site where historically, development would not have been permitted. Allowing financial payments in lieu of on-site delivery would fundamentally weaken that planning balance and undermine public confidence in the purpose of the Golden Rules.

- b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer
- 68) What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).
- 69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly? Please explain your answer.
- 70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?
- a) If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.
- 71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 72) Do you agree the with the criteria set out regarding the locations of specialist housing for older people? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 73) Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 74) Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

Strongly agree, subject to a consistent understanding of what constitutes “easy and safe” access to frequently-used services and the relevant education facilities. Student accommodation should not be located where there are limited transport links and little in the way of leisure and social opportunities in the immediate area.

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

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

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

Partly disagree. The term “physically well related to settlements” is ambiguous and requires proper definition. There is concern with the term “majority of affordable housing or affordable traveller pitches” which would appear to enable a site to deliver just 51% of affordable housing or affordable traveller pitches, which some developers may treat as a 49% target for market housing on a site, rather than keep the market housing proportion to the minimum required to maximise delivery of affordable properties.

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

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

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

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

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

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

Strongly disagree. The proposed policy HO12 appears to represent a weakening of policy criteria for assessment of traveller sites, including current safeguards around Green Belt, flood risk areas, and potential for over-dominance of traveller sites for the nearest settled community. Overall, the policy risks undermining the balance between meeting traveller accommodation needs and supporting cohesion of local communities and safeguarding areas where there are sensitive environmental issues.

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

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

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

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

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

a) Please provide your reasons.

83) Do you agree with the proposed changes to the Housing Delivery Test rule book? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

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

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

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

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

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

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

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

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

Partly disagree. It is possible that “well-designed new buildings” (E4(1)) may fail to take into account local character. It is important that local character is reflected in building design as per E4(2). It is not clear what constitutes being “physically well-related to existing development” (this term is used in several places in the framework and would benefit from proper definition). The policy should also emphasise the importance of protecting local residential amenity, recognising that certain types of business use and intensities have the potential to severely impact residents’ quality of life.

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

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

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

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

- 90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?
- 91) Do you believe the sequential test in policy TC3 should be retained? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 92) Do you agree with the approach to town centre impact assessments in policy TC4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 96) Do you agree with the approach to planning for energy and water infrastructure in policy W1? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?
- 97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.
- 99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

- a) Please provide your reasons, particularly if you disagree.
- 101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of 'minerals of national and local importance'? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- 106) Please provide your reasons, particularly if you disagree.
- 107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- 108) Please provide your reasons, particularly if you disagree.
- 109) Do you agree with approach to coal, oil and gas in policy M5? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 110) Are there any other exceptional circumstances in which coal extraction should be permitted?
Yes/No
- 111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.
- 112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please provide your reasons, particularly if you disagree.
- 114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

115) If not, what further guidance is needed?

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

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

Partly disagree. There is potential for unintended consequences and an undermining of directing development to the most sustainable locations. Rural areas would appear to be particularly vulnerable to inappropriate development of an overly urbanising nature under this policy (e.g. upwards development and higher buildings on corner plots will not always be appropriate).

117) Do you agree policy L2 identifies appropriate typologies of development to support intensification? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) If not, what typologies should be added or removed and why?

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

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

Strongly disagree. See answer to question 116. The principles are generic and do not take into account local factors. A site-specific assessment is required to consider which types of development and design may be appropriate.

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

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

Strongly disagree. Please see answers to questions 116 and 118 above. Not every corner plot is suitable for “landmark” type buildings. Upwards development in an area with a general prevailing building height (e.g. a two-storey detached or semi-detached residential area) risks creating incongruous and jarring outcomes.

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.

Strongly disagree. “Residential curtilage” is not always clearly defined and the situation on site can vary over time. “The footprint of the existing building on the site” does not seem to take account of situations where there is more than one existing building on a site. 50% is potentially too large for some properties where curtilages are extensive. Green Belt should be excluded from this policy.

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

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

Partly agree. The availability of infrastructure and “suitable transport options” are vague terms that require further clarification. “Scope for improvement” seems meaningless unless the necessary improvements can be secured by condition or legal agreement. It will not always be the case that an increase in density is required, local circumstances should always be taken into account.

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

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

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

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

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

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

a) Please provide your reasons and preferred alternatives.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Partly agree. It is suggested that paragraph 1(d) is strengthened in order that there is an expectation for compensatory improvements where land is proposed to be removed from the Green Belt. The term “can be offset” implies that this is discretionary and undermines the fundamental aim that Green Belt boundaries should be permanent.

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

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

Partly disagree. “Limited infilling in villages” (1(c)) has been subject to varying interpretations and would benefit from proper definition, perhaps aligning it with settlements. The “genuine choice of transport modes” in referenced policy TR3 under 1(g)(iii) requires clear definition.

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

Strongly disagree. In section 1(h) it is unclear whether all of (i) to (v) should apply together, or whether these are separate tests. It must be clarified that all of the criteria apply, as in particular (h)(iii) would appear to be extremely permissive, potentially allowing a wide variety, form and scale of development in the Green Belt subject to availability of infrastructure.

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

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

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

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

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

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

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

a) Please explain your answer.

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?

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

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

Strongly disagree.

Chobham Parish Council strongly objects to both the current and proposed definitions of "Grey Belt". As drafted, the definition risks significantly weakening the long-established purpose and effectiveness of Green Belt policy. The Grey Belt concept was initially presented as a means of bringing forward genuinely low-quality and previously developed land within the Green Belt, e.g. redundant car parks, disused garages, or other visually intrusive sites and wasteland. However, in practice the definition has become considerably broader, encompassing land that contributes meaningfully to the openness of the Green Belt and to the other purposes it is intended to serve.

The proposed definition and approach particularly encourages development on land at the edges of rural villages and settlements, rather than directing growth towards more sustainable locations such as towns and urban areas. This risks fragmenting the openness of the countryside and incrementally eroding the Green Belt through cumulative encroachments. Development of this nature contributes to urban sprawl and the merging of neighbouring villages, undermining their clear separation that Green Belt policy has historically sought to maintain.

The proposed definition does not sufficiently focus on genuinely previously developed land or sites that are of demonstrably low environmental or landscape value. Instead, it captures land that plays an important role in maintaining the character and openness of the countryside. By allowing such land to be classified as Grey Belt, the policy is

permitting development in locations conflicting with the purposes of the Green Belt, including safeguarding the countryside from encroachment.

This approach is also undermining the plan-led system by encouraging speculative and ad hoc proposals in the Green Belt, despite in many cases the land being green, open and unspoilt, or even valuable farmland and wildlife habitats. Decisions about whether Green Belt land should be released for development are best made through strategic local plan processes, supported by robust evidence and community engagement. The current proposals bypass this strategic approach and will continue to result in piecemeal development that is not properly coordinated with infrastructure or long-term planning objectives. The Parish Council therefore calls on the Government to urgently reconsider the definition to ensure that Green Belt protections are not further weakened and that the policy targets only land that is unequivocally of low quality and limited contribution to Green Belt purposes.

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

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

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

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

Partly agree. It is important that design codes that already exist in a Neighbourhood Plan are not superseded or diminished.

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

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

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

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

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

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

Partly agree. It is felt that more emphasis could be placed on the most sustainable transport options (active travel and good public transport), with less weight given to less sustainable options. It would be helpful include in the Glossary a planning distinction between airfields, aerodromes and airports.

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

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

Partly disagree. The setting of maximum parking standards may cause unintended consequences, especially where sustainable transport options are aspirational rather than reflecting real-life scenarios, leading to low take-up and a high reliance on private vehicles. There should always be an option for parking to be considered on a case-by-case basis.

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

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

Partly agree. The “genuine choice of transport modes” requires proper definition and a stronger emphasis on transport modes with low environmental impacts. At a minimum there should be: safe, direct and convenient walking and wheeling routes, safe cycling routes and infrastructure that is integrated into wider networks, and frequent, reliable and accessible public transport. The choices should reflect real-world scenarios and current usage patterns rather than being aspirational. This should be secondary to locating development in more sustainable locations with reduced need to travel. “Proposals which could generate a significant amount of movement” is also open to a wide range of interpretations.

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

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

Partly agree. First priority should include wheeling alongside pedestrian and cycling. It is not clear what constitutes “high quality” public transport. While developments should include policy-compliant cycle parking, consideration should also be given to provision of public cycle parking in general, e.g. if there is no cycle parking in a village centre or at a main bus stop, this represents a significant barrier to short local cycle journeys.

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

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

155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering

impacts on the transport network? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

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

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

Partly agree. It is suggested that the policy is strengthened to specifically guard against loss of aviation airfields, and extended to include detail on emerging aircraft technologies, e.g. drones and eVTOLs.

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

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

Strongly agree. A policy aimed specifically at improving existing access for people with more limited mobility would also be welcomed, e.g. replacing stiles with gaps or gates, and not installing any new stiles other than in exceptional circumstances.

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

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

Strongly agree. It is further suggested that wheeling is included in 1(e) and in all places in the framework alongside walking and cycling where it is not currently included.

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

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

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

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

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?

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

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

Partly disagree. There is concern about the policy only applying where the facility would be the "last of its type" in the area concerned. In some cases the "last" facility in an

area may be some distance from the main part of the community (even possibly necessitating car journeys) and there is a risk that closer, more convenient and well-used facilities would be lost.

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

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

Strongly agree, provided the policy does not prevent allotments being provided for the community on a temporary basis, for example on land intended for burials and used for allotments until such time as it is needed for burial plots.

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

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

Strongly agree. These areas of land should not benefit from the grey belt and PDL exceptions.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Partly agree. Assessing flood risk should also take account of any local evidence of flooding, even where land is outside of recognised flood zones. Desk-based assessments do not always accurately reflect the real-life position.

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

a) Please provide your reasons, particularly if you disagree

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

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

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

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

Strongly agree. It would be helpful to understand what type of reasons may be considered “compelling reasons” for a watercourse to be enclosed.

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

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

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?

178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.

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

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

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?

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

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

Partly disagree. The wording of policy N2 should be strengthened to ensure valued local landscapes and local agricultural land are protected against erosion and loss. E.g.: Rather than “identifying opportunities” for landscape qualities to be conserved or enhanced, or seeking for valued trees and hedgerows to be retained “wherever possible”, this policy overall could be strengthened. It is important that protection measures are not read as vague or optional.

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

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

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

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

Partly agree. National Nature Reserves and Special Areas of Conservation should be included in the hierarchy. Areas of SANG (Suitable Alternative Natural Greenspace) could also be afforded specific protection under this policy, in recognition of their contribution to supporting the conservation of important habitat areas.

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

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

a) Please provide your reasons.

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

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

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

Strongly agree. It is assumed that this relates to policies HE1-HE3 and that H1-H3 is a typo. It is suggested that an expectation is set that the local list will be updated at intervals of no greater than 5 years, and that it be recognised in the policy that heritage assets may exist that are not as yet captured on any list. The requirement to review Conservation Areas “periodically” is rather a broad term and would benefit from some guidance as to an actual timeframe – perhaps every 10 years.

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

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

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

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

Strongly agree, subject to there being no actual weakening of the weighting to be applied through the change of wording from “great” to “substantial”.

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

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

Partly agree. The separation of Conservation Areas into its own section is welcomed. There are concerns around the wording “wherever possible” in 1(a) which would appear to be an easy get-out clause unless full justification is required as to why buildings and features cannot be retained and restored.

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

192) Do you agree with the transitional arrangements approach to decision-making? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*

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

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

In addition to the comments already set out in this response, the following general concerns are raised:

1. The proposed changes appear to weaken long-standing Green Belt protections, with potentially disproportionate impacts on rural villages that rely on these policies to manage growth sustainably.
2. The scale and mandatory nature of housing targets may result in development proceeding ahead of necessary infrastructure provision, and in locations that do not represent genuinely sustainable patterns of growth.

3. There is concern that aspects of the revised Framework could reduce the weight afforded to locally derived evidence and plan-making, potentially leading to erosion of local character, particularly within rural communities.
4. The proposed reforms place significant additional responsibilities on Local Planning Authorities, and it is unclear whether sufficient staffing, funding and resources will be available to deliver them effectively.
5. The role and status of Neighbourhood Planning within the revised Framework would benefit from clearer articulation to ensure it remains a meaningful component of the plan-led system.

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

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

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

a) Please give reasons.

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

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

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

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

a) Please provide your reasons.

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

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

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

a) Please explain your answer.

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

- a) Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market for sale housing.
- 203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?
- a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.
- 204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?
- a) Please explain your answer.
- 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?
- 206) Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please explain your answer.
- 207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?
- a) Please explain your answer.
- 208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) In what circumstances might a premium, or the usual premium, not be required?
- b) What impact (if any) would you foresee if this change were made?
- 209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? *Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.*
- a) Please explain your answer.
- 210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? *Decision maker discretion / Another metric / Neither*
- a) If another metric, please set out your preferred approach and rationale.
- 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?

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

a) Please explain your answer.

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

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

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

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

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

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

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

a) Please provide your reasons.

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

a) Please provide your reasons.

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.

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.

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

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

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

Partly disagree. While it may be appropriate in some areas, there is a risk of unacceptable outcomes concerning "Habitats Development" (development likely to have a significant, unmitigated effect on a protected site). Any extension of PiP should either exclude Habitats Development, or ensure that environmental safeguards,

particularly in relation to protected habitats, are robustly applied prior to the granting of Permission in Principle, rather than deferred to later technical stages.

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

A planning statement, and potentially other further supporting information, would be appropriate due to there being greater potential for impacts. It is suggested that the current 5-week determination time limit would also be too short to consider larger developments and this should be extended to ensure proper scrutiny and meaningful engagement.

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

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

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