

# Response ID ANON-SNQ4-RD5K-V

Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system  
Submitted on 2024-09-23 10:33:58

## Scope of consultation

### Respondent details

a What is your name?

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c What is your organisation?

Organisation:  
Garforth Neighbourhood Planning Forum

d What type of organisation are you representing?

Neighbourhood planning body, parish or town council

If you answered "other", please provide further details:

## Chapter 1 – Introduction

### Chapter 2 – Policy objectives

### Chapter 3 – Planning for the homes we need

1 Do you agree that we should reverse the December 2023 changes made to paragraph 61?

No

Please explain your answer:

No. Unfortunately the focus is just on housing target numbers using the market to deliver when there is plenty of evidence that the market has failed to deliver in the past despite adequate planning permissions developers restrict building to keep prices high. Local authorities should be funded to build social housing in order to solve the housing crisis. Using brownfield land and modular construction not forgetting bringing back into use all the 1.4 million dwellings identified by the ONS in the last census that are not occupied.

There is no definition of exceptional circumstances in the NPPF glossary. The use of this term is open to many interpretations and was used by Leeds to justify development on the green belt in one area of the city when there were sufficient brownfield sites within the city.

2 Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

No

Please explain your answer:

No. Local authorities need to be flexible and meet their local need ie housing waiting lists housing need should be specific to a locally identified need. There is no rationale for imposing a higher housing target than a locally identified need. There will be an additional carbon footprint if people have to travel for employment and services.

if housing is imposed on areas not having an identified need.

3 Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Yes

Please explain your answer:

Yes, there should be greater co-operation across boundaries to consider the implications of large developments on the infrastructure of another area.

4 Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

No

Please explain your answer:

No. Increasing density may be appropriate in some areas to match neighbouring buildings, however increasing density also necessitates increased infrastructure and services including accessible green spaces of all typologies. Without increases in infrastructure, the density of traffic will increase along with road congestion and increased pollution.

Why is there no mention of the need to renovate all the empty dwellings, offices, employment and retail premises for domestic use ?

5 Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes

Please explain your answer:

Yes. Accepting this refers to new towns design codes should be specific to the new town and not imposed elsewhere in infill sites where it would not be appropriate. Design codes and Spatial Visions could be open to different interpretations. How do you assess design codes and spatial visions?

6 Do you agree that the presumption in favour of sustainable development should be amended as proposed?

No

Please explain your answer:

No. The current description of sustainable development para 7-8 is very subjective. Para 8b) & c) need to be specific , could be by referring to a local authorities Core Strategy and need to be mandatory to achieve a truly sustainable development which meets present and future needs of communities.

7 Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

No

Please explain your answer:

No. If a local plan has been agreed, met all 'conditions' ( sound and legally compliant ) it is the responsibility of developers to deliver the required housing target which should remain until the next local plan and new housing targets is produced. There needs to be a mandatory policy for developers to build in a timely manner.

8 Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Not Answered

Please explain your answer:

No. If a local plan has been agreed, met all 'conditions' ( sound and legally compliant ) it is the responsibility of developers to deliver the required housing target which should remain until the next local plan and new housing targets is produced. There needs to be a mandatory policy for developers to build in a timely manner.

9 Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

No

Please explain your answer:

No, If the local housing need has been established, it is the responsibility of the developers to provide this target within the timescale. Is this question relating to choice and competition in the 'market'

10 If Yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

No (It should be a different figure)

Please explain your answer if you believe a different % buffer should be used:

No . there is no need for a buffer to ensure competition in the market for land. Developers will always build otherwise they do not make their protected profit.

11 Do you agree with the removal of policy on Annual Position Statements?

No

Please explain your answer:

No . This is only mentioned in the glossary. Local authorities should be consistently monitoring housing delivery, as planning permission has already been granted. Continued modifications with problems identified at a later stage only delay delivery, and should have been identified if adequate plan preparation had been prepared prior to outline submission.

12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Yes

Please explain your answer:

Yes co-operation should always be encouraged. See answer to question 3.  
Strategic matters should always consider and include future food security by protecting BMV land.

13 Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Yes

Please explain your answer:

Yes. Tests of soundness should not only identify the necessary infrastructure but also ensure that there is funding identified to implement. It needs to include the impact of development.

14 Do you have any other suggestions relating to the proposals in this chapter?

Please provide any other suggestions relating to the proposals in this chapter. :

Yes paragraph 62 footnote 28 has also been removed and should remain, to prioritise Brownfield sites, allowing people to live near services or deliver new services and make travel more sustainable. There needs to be policies for renovating the 1.4 million empty properties that were identified by the ONS following the 2021 census

#### Chapter 4 – A new Standard Method for assessing housing needs

15 Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No

Please explain your answer:

No. Homes need to be built where a local need has been delivered. Why is there no mention of the fact that there are 1.4 million dwellings than households as identified by the ONS ( 2021 )census return. If these were used, modified or demolished with land used for immediate need then there would be little need for green belt removal. Just extending development attached to urban areas does not guarantee additional infrastructure and services as planning decisions are taken on the basis that all the infrastructure and services are present. The Leeds local plan in 2018 proposed an additional 2.400 development extension ( a 45% increase) to one settlement as facilities and services were available, the proposed alterations to local roads and motorway junctions had not been funded. A more appropriate starting point would be the local authorities housing waiting list for social housing. Provision and reducing prices for starter homes could be accomplished by investing in modular construction as the need is urgent. Just adding 8% to all communities throughout the country will not solve the problems of services, infrastructure and employment provision .

16 Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

Not Answered

Please explain your answer:

17 Do you agree that affordability is given an appropriate weighting within the proposed standard method?

Not Answered

Please explain your answer:

18 Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Not Answered

Please explain your answer:

19 Do you have any additional comments on the proposed method for assessing housing needs?

Please provide any additional comments on the proposed method for assessing housing needs.:

Yes.

There needs to be a target for social housing as the market has not delivered sufficient 'affordable' to solve the housing crisis.

There needs to be a policy guideline for local authorities to identify empty properties, facilitate the conversion of empty office and retail buildings for residential accommodation in preference to planning committees granting permission for even more hot food takeaways to take the place of empty high street shops

## Chapter 5 – Brownfield, grey belt and the Green Belt

20 Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes

Please explain your answer:

Yes Brownfield land should always be accepted in principle for development and government funding should be available to clear any contaminated land. There should be a policy to ensure that all brownfield land is developed first before any release of Green belt land.

21 Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

Yes

Please explain your answer:

Yes however Development on previously developed land in the green belt should be restricted to small developments < 10 houses protected and retained for affordable homes for agricultural and other people working in the immediate area and not market homes. Subsection g) should be retained

22 Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Please provide any further views:

Yes. Given the increased population, the importation of over 48 % of the nation's food ( <https://www.foodsecurity.ac.uk/challenge/uk-threat/>), the uncertain global conflict expansion which impacts on food imports and energy, all land used for food production should be protected from development unrelated to food production.

23 Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

No

Please explain your answer:

No. Grey belt land has been marketed as carparks etc. which would only represent small sites, if this is developed to provide affordable/ social homes for people who live in the immediate area and not be permitted to be resold to people who may use them for second homes. ie not market homes.

However the other proposal to include in this definition land which makes a limited contribution to the 5 green belt purposes is open to interpretation and a bonus for developers.

The 5 purposes should include land which is used for agriculture otherwise the Uk will continue to lose land which would provide for food security.

24 Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Yes

Please explain your answer:

Yes. High performing green belt land is often good quality agricultural land grades 1,2 & 3 A ( BMV) and as such should always be protected from development. However grades 3b and 4 are mostly in agricultural use for some crops and livestock. All agricultural land should be protected from development for food security for future generations. Once built on it is lost forever. Paragraph 14 in this chapter. See also answer to question 82

25 Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Yes and it should be contained within the NPPF

Please explain your answer:

Yes additional guidance should be provided to identify land which makes a limited contribution of green belt purposes. If it is just guidance then why cannot it be in both?

Guidance should include the protection of BMV land.

26 Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Yes

Please explain your answer:

Most Green Belt land is used for food production and as such serves another main purpose. This should be recognised as a vital asset. It should be made clear that any land used for food production should be protected for future generations.

27 Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Yes

Please explain your answer:

Yes Local nature recovery strategies should not decrease the amount of land used for food production. Land for grazing already provides for wildlife and fauna. Land used for crops should always include strips or other sections set aside for wildlife.

28 Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

No

Please explain your answer:

No Suitable Grey belt land should be the only circumstance for releasing small sections ( eg car parks ) of the Green Belt. Most Green Belt land is in Agricultural production and should always be protected from development. Presumably this question is related to the development of new towns. Which should be considered essential given the exponential increase in the population. Towns and cities cannot continue to expand if there is a serious plan to achieve net zero.

29 Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes

Please explain your answer:

yes agree that the release of land should not undermine the function of the Green Belt, nor of land used for food production ie BMV but unless there are strict guidelines then developers will utilise this land for houses which most people cannot afford and will not want to provide 50% affordable homes. There are many get-out viability clauses elsewhere in these proposals. It will be a developers charter.

30 Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

No

If not, what changes would you recommend?:

No. Decisions to remove Grey Belt sites from Green belt land should only be taken after all other possible options have been excluded. Any development on Grey Belt land should be accompanied by the appropriate new infrastructure. New towns need to be part of a National Infrastructure project and funded appropriately to support the massive and exponential increase in the population.

31 Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Yes

Please explain your answer:

Yes. The only other commercial need should be for food production. Anything else will increase traffic congestion and further road infrastructure.

32 Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

Yes

Please explain your answer:

The Planning policy for travellers sites 2023

<https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites> policy B states that appropriate health services and education for children should be provided, so it would not seem appropriate to release Green Belt land for further traveller sites as these services will not be available nor sustainable.

33 Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

Yes

Please explain your answer:

Yes. Policy A of the above link already gives detailed guidance on assessing need. The policy also states that there is no assumption that Local Authorities are required to plan to meet the need for travellers sites in full.

34 Do you agree with our proposed approach to the affordable housing tenure mix?

No

Please explain your answer:

No, it is for local authorities to decide based on their housing application list. A target of 50% affordable housing including social rent subject to viability will be rejected by major developers especially on settlement extensions in the Green Belt. However where a New Town is proposed this should be mandatory. Viability exclusions should be omitted otherwise developers will never provide 50%. There should be target numbers for social housing otherwise the housing crisis will not be solved .

35 Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

The 50% target should apply to all Green Belt areas (including previously developed land in the Green Belt)

Please explain your answer:

This should apply for new towns. However applying this target for settlement extensions is not practicable as developers will use viability issues to deliver less.

Using Grey Belt land within the Green Belt should be reserved for social rent for people working in the immediate area to avoid properties becoming second homes for people outside the area. To solve the housing crisis then the emphasis should be on social housing. Just delivering more market housing will not solve the problem as people cannot afford them. The property website Zoopla acknowledges that developers will not supply the numbers of homes to flood the market and reduce prices.

36 Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Yes

Please explain your answer:

Yes Releasing Grey Belt land within the Green Belt is the sole purpose of these proposals, the majority of the remainder of the immediate area will be agricultural land which already supports wild life and it is unlikely that farmland will be available for public access apart from public footpaths. However if new towns are proposed then all the green space typologies will be required. See question 70!

37 Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

No

Please explain your answer:

There must not be any viability clauses in the NPPF, otherwise developers will seek to use these issues to avoid building 'affordable' homes and a government policy to deliver 50% affordable homes will never be realised.

38 How and at what level should Government set benchmark land values?

Please explain your answer:

39 To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

Yes

Please explain your answer:

There must not be any viability clauses in the NPPF, otherwise developers will seek to use these issues to avoid building 'affordable' homes

40 It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Please explain your views on this approach:

41 Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

No

Please explain your answer, including what support you consider local authorities would require to use late-stage viability reviews effectively:

No. developers should have completed all their research prior to outline housing application submission. Viability applications always reduce the developers' requirement to provide/ fulfil the local authorities policy criteria and delay delivery. There should not be any viability clauses in the NPPF

42 Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

Yes

Please explain your answer:

Yes, In order for the local authority's policies to be implemented and homes delivered to a timescale, developers must not claim viability issues. They will have land banked sites years before and been aware of any issues affecting viability. Policies allowing viability opt-outs are prioritising developers profits over the public good and must be removed from the guidelines.

43 Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

Not Answered

Please explain your answer:

44 Do you have any comments on the proposed wording for the NPPF (Annex 4)?

Not Answered

Please explain your answer:

45 Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

Not Answered

Please explain your answer:

46 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

Yes, In order for the local authority's policies to be implemented and homes delivered to a timescale, developers must not claim viability issues. They will have land banked sites years before and been aware of any issues affecting viability. Policies allowing viability opt-outs are prioritising developers profits over the public good and must be removed from the guidelines.

## Chapter 6 – Delivering affordable, well-designed homes and places

47 Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes

Please explain your answer:

Yes. Due to the now disproportionate cost of housing to income there is an even greater need for prioritising social housing, lack of which is fuelling the housing crisis. Yes local Authorities are best judged to decide on their priorities and for them to state the percentages of socially rented homes. Local Authorities and Housing associations are best placed to plan their structure and housing associations offer additional services and support for tenants.

48 Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes

Please explain your answer:

yes. Local authorities are best placed to decide on percentages through their housing needs assessment. The requirement may be greater. Developers will always claim viability issues. Text allowing viability opt-outs must be removed from the guidelines.

49 Do you agree with removing the minimum 25% First Homes requirement?

Yes

Please explain your answer:

yes. Local authorities are best placed to decide on percentages via their housing need assessment. The requirement may be greater as young people are trying to purchase their first home .If there is no minimum requirement developers will not voluntary provide a mix.

50 Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

Yes

Please provide any further comments:

Yes. The glossary does not define First Homes and given that these are included within the 'affordable' range, can still be beyond the ability of many people to purchase depending on the site.

51 Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes

Please explain your answer:

Yes, otherwise depending on the site developers will build homes that deliver the most profit. The text does not explain how the inclusion of a mixture of tenures and types will support the timely build out of sites. Please explain. Will the major developers agree and facilitate these sites or claim viability issues?

52 What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Please explain your answer:

Cost is a very major factor, relying on major developers who will claim viability issues and cite difficulties in selling expensive homes on greenfield sites is not a solution. Development sites for social housing whether organised and supervised by Housing associations or Local Authorities would be the most appropriate way forward to provide for people unable to ever afford a mortgage. This is the only way to alleviate the present housing crisis. Modular construction methods should be encouraged and homes built to a high standard with appropriate facilities and infrastructure and green spaces. There should be targets for social housing members for local authorities based on their housing waiting lists

53 What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Please explain your answer:

Large council housing estates have not been built for many years. Housing Association developments are usually smaller developments when compared to the very large council estates of the past and offer additional support and services for tenants.

54 What measures should we consider to better support and increase rural affordable housing?

Please explain your answer:

Empty properties eg barns should be reconverted to affordable homes for local residents instead of a large individual dwelling. These homes should never be available to be purchased.

55 Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Yes

Please explain your answer:

56 Do you agree with these changes?

No



Please explain your answer:

No an exception site should not be a route to a large development

57 Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

Yes

If Yes, what changes would you recommend?:

Yes. Is the 'term affordable housing for rent' really appropriate as it includes housing provision which is completely paid by the Local Authority. Could use the term 'Community Housing for rent'. The generic term 'Affordable housing' which at present includes discounted prices for home ownership is confusing as many people would consider a 30 % discount on the purchase price still unaffordable. What is the provision to ensure that a home purchased at a discounted rate remains at a discounted rate when sold?

58 Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Yes

Please explain your answer :

Yes. There is no definition of a small site in the glossary. The small site policy is presumably the proposed para. 71. Small sites tend to be brownfield land and may be more 'affordable' for small developers or may have contamination issues in which case government funding should be made available for decontamination. Greenfield Green Belt sites which come forward in the 'call for sites' are often large and in most cases major developers have already taken out option agreements.

59 Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

Yes

Please explain your answer:

Yes. There is no definition of beautiful/ beauty and it is very subjective term.

60 Do you agree with proposed changes to policy for upwards extensions?

Yes

Please explain your answer:

Yes, it would be an appropriate way to increase living space. Planning departments already receive many application for loft conversions, however this depends on the roof height. Adding an additional floor to buildings would depend on the neighbouring properties and would not always be suitable.

61 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

It would be appropriate to ensure that roof heights of new builds are capable of conversion to usable rooms with supporting beams. This would not affect neighbouring properties. This would be similar to the electric car sockets and downstairs toilets which are now mandatory. This would save on the many extensions built in gardens.

## Chapter 7 – Building infrastructure to grow the economy

62 Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

No

Please explain your answer:

No this is appropriate for new towns but not for settlement extensions which would exacerbate the already inadequate infrastructure.

63 Are there other sectors you think need particular support via these changes? What are they and why?

Yes

Please explain your answer:

Appropriate infrastructure and all public services are needed There should be a policy to make infrastructure and public services mandatory. Most of the opposition to development is due to lack of infrastructure which should have been provided by the council and developers.

64 Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

Yes

Please explain your answer:

Yes for new town developments. But not to the detriment of the local residents. NSIP needs defining in the glossary.

65 If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

Yes

If Yes, what would be an appropriate scale? :

Would these projects just relate to the new towns. If not then there needs to be limitations as to scale due to infrastructure requirements.

66 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

Yes .Given the recent exponential increase in the population are there any additional water reservoirs planned ?

## Chapter 8 – Delivering community needs

67 Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

No

Please explain your answer:

No . Schools and GP services are often mentioned in site appraisals, however there is no obligation for developers to provide sufficient services/ infrastructure to meet residents needs. These should be listed , accurately funded and sources of funding identified. This should be included in the paragraph wording.

68 Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Yes

Please explain your answer:

Yes agree, however these should be accurately funded and sources of funding identified. The last Leeds Local Plan was proposing an additional 2.500 development but infrastructure had not been identified.

69 Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

No

Please explain your answer:

No however, a vision led approach is subjective and open to different interpretations Visions have to be practicable and financially viable.

70 How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Please explain your answer:

Why is there no mention of adult obesity? Parents provide for their children and eating patterns are predominately set in childhood. The increase in obesity has coincided with the exponential increase in hot food takeaways which now dominate many retail frontages particularly in deprived areas. Leeds has a Supplementary Planning Policy on Hot Food Takeaways which prohibits new HFT within 400 m of a primary school. This has not reduced the incidence of childhood obesity. Planning permission for HFT relates to the location but not to opening hours as with licenced premises. Most HFT only open in the evening when the consumption of these energy dense meals exacerbates the incidence of obesity. Nation planning policies could limit the opening hours and relate them to 'conventional' meal times ie when children and many working parents eat. ( This obviously does not apply to people working shifts who would need to consume meals made at home as happened before the proliferation of HFTs).

Other planning policies could increase the amount and easier access to open spaces where the public can participate in many physical activities including walking and children's play areas. Many are located outside walking distances for small children and involve crossing busy roads. There needs to be an

increase in Local Green Spaces (particularly parks with children's play areas). Leeds Core Strategy only require 1 hectare per 1,000 people within 720 m. However new housing developments can provide these off site or commuted sums in lieu of on-site provision. National policy should ensure that there are mandatory requirement to provide onsite green spaces for amenity recreation.

71 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

Yes . All infrastructure requirements, and all public services should be identified and funding guaranteed. This should be a mandatory requirement in the NPPF. Maybe then there would be less opposition to development.

## Chapter 9 – Supporting green energy and the environment

72 Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Yes

Please explain your answer:

Yes but avoid bird migration routes. There is no definition of NSIP in the glossary.

73 Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

No

Please explain your answer:

No Why is there no mention of NSIP projects for energy provision for when the wind does not blow and the sun does not shine? Why is there no mention of nuclear or wave power generation.

74 Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Yes

Please explain your answer:

75 Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Not Answered

Please explain your answer:

76 Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Not Answered

Please explain your answer:

This question needs a 'don't know option. Solar panels should not be built on agricultural land. Consider making solar panels on new builds mandatory, encourage panels on other commercial buildings and car parks

77 If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Please explain your answer:

78 In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Please explain your answer:

At present there are no mandatory requirements for new buildings to have solar panels. There are mandatory requirements for 2 electric charging points on new dwellings so why not solar panels. If these were mandatory on all new development then the price of installation would be significantly reduced (economies of scale ). There is a need to encourage solar panels on existing domestic and commercial buildings and car parks instead of using agricultural land as even Grade 3b and 4 are currently in agricultural use.

79 What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Please explain your answer:

80 Are any changes needed to policy for managing flood risk to improve its effectiveness?

Yes

Please explain your answer:

Need to address surface water flooding. Most developments plan for 2 car parking spaces in replacement of the front garden. This is a consequence of densification.

81 Do you have any other comments on actions that can be taken through planning to address climate change?

Yes

Please explain your answer:

Yes Avoid further development on the Green Belt. Make it mandatory to use all existing brownfield sites and empty properties.

82 Do you agree with removal of this text from the footnote?

No

Please explain your answer:

No .Do not agree. It is claimed that there is no indication of how local authorities are to assess and weigh the availability of agricultural land when making planning decisions. This is incorrect as the following guidelines are available and used by Leeds City Council in their appraisal documents.

There is an ALC ( Agricultural land classification ( MAFF 1998 ) which is the approved system for grading agricultural land quality. The British Society of Soil Science guidance document 2022 gives detailed validation processes

[https://soils.org.uk/wp-content/uploads/2022/02/Assessing-Agricultural-Land-Jan-2022.pdf#:~:text=The%20ALC%20system%20\(MAFF%201988,England\)%20and%20Land%20research%20Associates](https://soils.org.uk/wp-content/uploads/2022/02/Assessing-Agricultural-Land-Jan-2022.pdf#:~:text=The%20ALC%20system%20(MAFF%201988,England)%20and%20Land%20research%20Associates)

<http://www.lra.co.uk/services/soil-survey-soil-mapping/agricultural-land-grades#:~:text=This%20is%20done%20using%20the,Grade%205%20being%20the%20lowest>  
Not forgetting the Natural England Guidance to assessing development proposals on agricultural land

<https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

It is disingenuous to suggest that qualified planning officers in Local Authorities are unaware of these documents. One can only presume that the proposal to removed this text is to facilitate development on the Best and Most versatile Land ( BMV ) even though your paragraph 21 states' that food security is important for our national security and that safeguarding BMV land is an important consideration'

83 Are there other ways in which we can ensure that development supports and does not compromise food production?

Yes

Please explain your answer:

The UK Food Security index 2024 states that the 'UK relies on imports for roughly 40% of its food. Strong production mitigates international risks to supply'. It also states that in 2023 17 m hectares was used for agricultural production as decrease of 2.2% from 2022. This is a broadly stable trend consistent with previous years.

If the Government is honest about ensuring there is food security for the UK and given that there has been an exponential increase in the population and serious global uncertainty then no more BMV land should be lost to development.

The country cannot afford to lose >2% of agricultural land every year. All BMV land should be protected for future generations

There is no justification for the removal of this text based on the arguments given.

84 Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Yes

Please explain your answer:

Yes It is generally acknowledged that additional reservoirs are urgently needed and need to be part of a national infrastructure project.

85 Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Yes

Please explain your answer:

Yes there is a need for more reservoirs and the need to replace leaking water pipes

86 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

There needs to be a stronger emphasis on surface water flooding.

## Chapter 10 – Changes to local plan intervention criteria

87 Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Yes

Please explain your answer:

Need to consider greater public consultation. There is no mention of this consultation outside of local authority planning departments. Planning decisions have an impact on the local population. There needs to be greater transparency as to the rationale stated for these policy changes . eg question 82. The text to be removed also removed protection for BMV land. The reason for this removal can only be to allow development on BMV land , reducing the nations ability to have a greater self sufficiency in food production at a time of global insecurity. The Government is concerned about energy security ( evidenced by energy companies plans for rationing at the beginning of the Ukraine war) Is the nation prepared for food rationing as well due to our inability to grow sufficient food.

88 Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Not Answered

Please explain your answer:

## Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

89 Do you agree with the proposal to increase householder application fees to meet cost recovery?

Yes

Please explain your answer:

Yes. Local authorities have financial difficulties and all services provided need to be financed. Householders applying should be expected to pay costs in full.

90 If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

Not Answered

If Yes, please explain in the text box what you consider an appropriate fee increase would be. :

91 If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Don't know

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.:

Local Planning departments are best placed to agree on appropriate fees.

92 Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Yes

Please explain your answer:

Local planning departments often received several subsequent applications during a large development. All these applications need to be fully costed and charged to the developer. This would encourage sufficient investigations are completed prior to an application. All subsequent applications delay the delivery of homes.

93 Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Yes

Please explain your reasons and provide evidence on what you consider the correct fee should be:

This is for local authority planning departments to answer

94 Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

Yes

Please explain your answer:

Yes. because all local authorities have financial difficulties and all services provided to developers need to recover the cost involved.

95 What would be your preferred model for localisation of planning fees?

Don't Know

Please give your reasons in the text box below:

Don't Know A question for local authorities.

96 Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

Yes

If Yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development? :

A question for local authority planning departments. But should be applicable to all applications then the applicant would be encouraged to ensure the applications met all planning regulation and save on planning officers further intervention/ time.

97 What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

Please explain your answer:

A question for local authorities

98 Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Yes

99 If Yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Please explain your answer:

Given the financial state of the country and the profit margins of house builders, fees should not be waived.

100 What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Please explain your answer:

If developers are seeking approval for applications this should not be at the cost to the council tax payer who in effect are subsidising developers where this occurs.

101 Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

Please explain your answer :

A question for local authorities

102 Do you have any other suggestions relating to the proposals in this chapter?

No

Please explain your answer.:

## Chapter 12 – The future of planning policy and plan making

103 Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

Not Answered

Please explain your answer:

104 Do you agree with the proposed transitional arrangements?

Not Answered

Please explain your answer:

105 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

## Chapter 13 – Public Sector Equality Duty

106 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? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

Please explain your answer:

## Chapter 14 – Table of questions

## Chapter 15 – About this consultation