

# Response ID ANON-1R1Y-UHHA-K

Submitted to Levelling-up and Regeneration Bill: Reforms to National Planning Policy  
Submitted on 2023-03-02 15:28:02

## Introduction

A Personal dataThe following is to explain your rights and give you the information you are be entitled to under the Data Protection Act 2018.Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.1. The identity of the data controller and contact details of our Data Protection Officer The Department for Levelling Up, Housing and Communities (DLUHC) is the data controller. The Data Protection Officer can be contacted at [dataprotection@communities.gov.uk](mailto:dataprotection@communities.gov.uk) 2. Why we are collecting your personal data Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.3. Our legal basis for processing your personal dataThe Data Protection Act 2018 states that, as a government department, DLUHC may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.4. With whom we will be sharing your personal dataDLUHC may share your personal data with external organisations, for purposes relating to this consultation, including analysis of responses. Any data shared with organisations outside of DLUHC will be anonymised where possible.5. For how long we will keep your personal data, or criteria used to determine the retention period.Your personal data will be held for two years from the closure of the consultation.6. Your rights, e.g. access, rectification, erasure The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:a. to see what data we have about youb. to ask us to stop using your data, but keep it on recordc. to ask to have all or some of your data deleted or correctedd. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.7. Your personal data will not be sent overseas.8. Your personal data will not be used for any automated decision making. 9. We use a third-party system, Citizen Space, to collect consultation responses. In the first instance your personal data will be stored on their secure UK-based server. Your personal data will remain on the Citizen Space server and/or be transferred to our secure government IT system for two years of retention before it is deleted. Please confirm that you have read and agree to the privacy notice

Please tick to confirm:

Yes

B What is your name?

Name:

Evelyn Frearson

C What is your email address?

Email:

woodfordneighbourhood@gmail.com

D What is your organisation?

Organisation:

Woodford Neighbourhood Forum

E What type of organisation are you representing?

Neighbourhood planning body, parish or town council

If you answered "other" please provide further details:

## Chapter 3

1 Do you agree that local planning authorities should not have to continually demonstrate a deliverable five year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than five years old?

Yes

Please set out the reasons for your answer:

The need to demonstrate a 5-year housing land supply can result in unsustainable development that is not supported by communities.

Local Authorities should not be put in the position of losing at appeal and having to pay costs due to lack of a 5-year housing land supply.

2 Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

Yes

Please set out the reasons for your answer:

Buffers can artificially inflate perceived requirements.

3 Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on?

Yes

Please set out the reasons for your answer:

Historical supply of homes should be taken into account because it may provide an indicator of future progress.

Or is there an alternative approach that is preferable?:

4 What should any planning guidance dealing with oversupply and undersupply say?

Answer:

Guidance should emphasise an appropriate demand for different types of housing being made available. This should take into account current demand and tenure in the local area and existing adopted Planning policies. The aspiration of local communities may need to meet both an oversupply and an undersupply of housing locally.

5 Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

Answer:

We support changes to protect neighbourhood plans.

We suggest deletion of the words "and allocations" as shown below because policy criteria based neighbourhood plans (such as our Woodford Neighbourhood Plan) should carry the same weight as plans which allocate sites:

"14. In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
- b) the neighbourhood plan contains policies to meet its identified housing requirement;

## Chapter 4

6 Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

Yes

Please set out the reasons for your answer:

We support the aims set out in Chapters 1 and 2 in the consultation document, particularly with regard to greater community involvement in planning, the aims to protect the environment, and mitigating and adapting to climate change. We believe the target of 300,000 homes per year is arbitrary and an over-simplification. The target needs to be updated in the light of more recent data and to acknowledge that the greatest shortage is in social housing.

As well as outlining the vital role that planning should play in meeting the requirements for housing and commercial development, the initial chapters of the Framework should emphasise the equally important role of planning in:

- Provision of a mix of housing types, including social housing and low priced market housing
- Encouraging development on brownfield sites first
- Provision of infrastructure, including sustainable transport, schools, health service facilities and access to green spaces
- Protection of open spaces
- Prevention of urban sprawl
- Addressing the needs of rural areas, as well as urban areas, in a holistic approach to planning
- Protecting the environment and reducing acceleration of climate change.

7 What are your views on the implications these changes may have on plan making and housing supply?

Answer:

Clarification that the result of the Standard Method is advisory is welcomed. Despite reassurances from ministers, Local Authorities seemed unwilling to deviate from the results of the Standard Method, perhaps for fear of a Local Plan being found unsound by Inspectors at Examination. The changes should give Local Authorities the confidence to take a different route if it is more appropriate for their circumstances.

It is unfortunate that the Standard Method is still based on 2014 ONS household predictions, which are now nearly a decade out of date. Subsequent predictions are lower and this reduction appears to be borne out by data from the Census 2021. The Standard Method will not produce accurate or

credible results until it is updated to utilise more recent ONS data and predictions.

The need for social housing provided by the Local Authority and assistance with market priced housing should be part of Housing Needs Assessment.

The term "Affordable Housing" is confusing and poorly understood by communities. Most lay people assume that it refers to low-priced market housing. "Subsidised Housing" might be a better term.

The affordability ratio is based on the hypothesis that increasing supply will reduce house prices. This is a very controversial and unproven hypothesis which is contested by many experts. It should not be part of the Standard Method.

8 Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs?

Yes

Please set out the reasons for your answer:

The guidance should be very clear and provide examples of what could constitute exceptional circumstances for the use of an alternative approach, in order to help Local Authorities and Planning Inspectors.

Examples may include

- topography unsuitable for development, including flood risk
- ecology sensitive to change and harm to the environment that could not be mitigated (mitigation is not always feasible with highly sensitive ecosystems that have taken hundreds or even thousands of years to develop)
- wider landscape sensitive to harm from over-development
- local air pollution
- the need to retain Green Belt for any of its five purposes
- densification that would harm the character of the immediate area
- exacerbation of traffic congestion in the local area
- harm to rural communities, the rural economy and food security due to reduction in local food production
- exacerbation of carbon emissions that could not be offset, including during construction as well as final use
- evidence that a majority of local residents have sound reasons for objection

Are there other issues we should consider alongside those set out above?:

Examples may include

- topography unsuitable for development, including flood risk
- ecology sensitive to change and harm to the environment that could not be mitigated (mitigation is not always feasible with highly sensitive ecosystems that have taken hundreds or even thousands of years to develop)
- wider landscape sensitive to harm from over-development
- local air pollution
- the need to retain Green Belt for any of its five purposes
- densification that would harm the character of the immediate area
- exacerbation of traffic congestion in the local area
- harm to rural communities, the rural economy and food security due to reduction in local food production
- exacerbation of carbon emissions that could not be offset, including during construction as well as final use
- evidence that a majority of local residents have sound reasons for objection

9 Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out-of-character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

Yes

Please set out the reasons for your answer:

Local Authorities should be clear that it is an option, but not a necessity, to review Green Belt boundaries when Local Plans are prepared or reviewed.

Green Belt should only be released if needs cannot be met on brownfield land and then only if the balance of benefits versus the harms is supported by comprehensive, detailed, up-to-date sound evidence.

Yes. Building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met. The balance of harms vs. benefits due to densification should be comprehensively assessed. See answer to question 10.

Yes. Past over-supply should be taken into account.

Currently, developers are incentivised to develop Green Belt and green field sites because it is much easier and cheaper than remediation of brownfield sites, so their profits are higher. Developers exert pressure on Local Authorities when Local Plans are in preparation and they have large funds available to recruit top legal representatives to make their case. Making it clear that there is no need to release Green Belt when making plans would reduce current developer "feeding frenzy" at this stage.

Grants for regeneration are welcome, but more needs to be done to tilt the balance in favour of brownfield development. Tax incentives for developers to achieve this could be devised.

10 Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out-of-character with the existing area?

Please set out the reasons for your answer:

The evidence should include:

Evidence of need from up-to-date data for housing land supply and analysis of local population demographics. This would need to outweigh evidence from assessment of the impact of higher densities on carbon emissions, air pollution, effect on landscape, character, ecology, local infrastructure, traffic congestion, noise, quality of life for residents, and access to green spaces.

11 Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?

No

Please set out the reasons for your answer:

The criteria for soundness of a plan, as set out in the current NPPF, are difficult concepts for lay people, but important and assessment should not be diminished. It is important that a plan is appropriate, has taken reasonable alternatives into account and is supported by comprehensive, up-to-date evidence.

We would prefer that the following text is retained "Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;"

We want the "best plan" that can be achieved, taking into account circumstances and constraints.

12 Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation?

No

Please set out the reasons for your answer:

Local Plans at all stages of preparation and review should be subject to intense scrutiny to determine soundness, appropriateness in the light of recent data and whether they are in the spirit of the revised NPPF. We should be aiming for the "best plan" that can be prepared to achieve all the objectives outlined in the answer to question 6.

If no, which if any, plans should the revised tests apply to?:

Local Plans at all stages of preparation and review should be subject to intense scrutiny to determine soundness, appropriateness in the light of recent data and whether they are in the spirit of the revised NPPF. We should be aiming for the "best plan" that can be prepared to achieve all the objectives outlined in the answer to question 6.

13 Do you agree that we should make a change to the Framework on the application of the urban uplift?

Indifferent

Please set out the reasons for your answer:

The urban uplift appears to be a device aimed at the Government's target of delivering 300,000 homes a year by the mid-2020s. This appears to be an arbitrary aspiration and a political "sound bite", rather than a target supported by sound evidence. The target should be reassessed in the light recent ONS and Census data. As the needs predicted using 2014 ONS data have not materialised, then urban uplift may not be necessary.

Where appropriate and needed, densification of urban areas may be acceptable, provided that it is focussed on previously developed land, does not impair the quality of life for residents, harm the character of the area, remove opportunities for urban green space, increase local air pollution or increase local traffic congestion.

14 What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

Please set out the reasons for your answer:

Measures to support development of brownfield sites could include grants and tax incentives.

15 How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

Please set out the reasons for your answer:

We would support in principle planning policy and/or guidance which allows and encourages full co-operation between Local Planning Authorities. A local example of this is the joint work between Stockport and Cheshire East Councils in building a new road by-pass around the town of Poynton to improve local accessibility in and around the town. Councils should be encouraged to work together as appropriate to local circumstances and seek to avoid red tape etc.

16 Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply?

Yes

Please set out the reasons for your answer:

We would support the proposed four-year rolling land supply requirement. We can confirm that the local Planning Authority for this area does not have an up-to-date Local Plan, so the rolling requirement approach would seem more appropriate.

If no, what approach should be taken, if any?:

17 Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

Yes

Please set out the reasons for your answer:

It is accepted that any guidance on constraints should be applied to any plans already being prepared. As for new Local Plans, this will likely depend on future timescales and progress towards the new National Planning Policy.

18 Do you support adding an additional permissions-based test that will 'switch off' the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

Yes

Please set out the reasons for your answer:

A "switch off" could be supported if planning permission has been granted sufficient to meet local community housing needs.

19 Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

Indifferent

Please set out the reasons for your answer:

The rationale behind 115% is not clear.

20 Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

Please set out the reasons for your answer:

An independent qualified quantity surveyor or an equivalent person may be an appropriate method in order to ensure that the appropriate number and types of homes are delivered within a given time framework.

21 What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

Please set out the reasons for your answer:

Following the publication of the 2022 Test, any additional funds could be used to influence and make any changes to be made to the 2023 Housing Delivery Test.

## Chapter 5

22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions?

Yes

Please set out the reasons for your answer:

Policy should be tightened to reduce the risk of developers finding ways to avoid commitments to build housing for social rent.

If yes, do you have any specific suggestions on the best mechanisms for doing this?:

23 Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

Yes

Please set out the reasons for your answer:

24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

Answer:

A policy which encourages some increase in the work of smaller developers and leads to some appropriate increase in the number of properties built on allocated housing or other local appropriate sites could be supported. Protected areas such as designated Green Belt sites and areas should remain.

25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

Answer:

Our community is mainly a rural area with substantial amount of Green Belt. Many new houses (mostly owner occupied) are being built on the site of the former Woodford Aerodrome to the south of the town of Stockport. The site lies within Green Belt but includes previously developed land that was formerly associated with the aircraft factory. Section 106 agreements with the housing developer cover off-site affordable housing. We would be unable to provide any ideas which would promote high levels of affordable housing in a community like Woodford.

26 Should the definition of "affordable housing for rent" in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

Yes

Please set out the reasons for your answer:

The term "Affordable Housing" is confusing and poorly understood by communities. Most lay people assume that it refers to low-priced market housing.

"Subsidised Housing" might be a better term.

27 Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

Answer:

Our community is mainly a rural area with substantial amount of Green Belt. It is poorly served by public transport and offers little local employment. Many new houses (mostly owner occupied) are being built on the site of the former Woodford Aerodrome to the south of the town of Stockport. The site lies within Green Belt but includes previously developed land that was formerly associated with the aircraft factory. Section 106 agreements with the housing developer cover off-site affordable housing. We would be unable to provide any ideas which would promote high levels of affordable housing in a community like Woodford.

28 Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

Answer:

Our community is mainly a rural area with substantial amount of Green Belt. It is poorly served by public transport and offers little local employment. Many new houses (mostly owner occupied) are being built on the site of the former Woodford Aerodrome to the south of the town of Stockport. The site lies within Green Belt but includes previously developed land that was formerly associated with the aircraft factory. Section 106 agreements with the housing developer cover off-site affordable housing. We would be unable to provide any ideas which would promote high levels of affordable housing in a community like Woodford.

29 Is there anything else national planning policy could do to support community-led developments?

Answer:

More Local Planning Authorities could be encouraged to meet local housing needs across the various tenures which might increase community-led development projects as has been achieved in some areas of the country already. Here is an example from a group of organisations, including the Royal Town Planning Institute (RTPI):

190709-planners-guide-clh-final.pdf (communityledhomes.org.uk)

[In case hyperlinks don't work in the response portal, these are the full web addresses:

<https://www.communityledhomes.org.uk/sites/default/files/resources/files/2019-07/190709-planners-guide-clh-final.pdf>

<https://www.communityledhomes.org.uk/> ]

30 Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?

Yes

Please set out the reasons for your answer:

If yes, what past behaviour should be in scope?:

31 Of the two options above, what would be the most effective mechanism?

Indifferent

Please set out the reasons for your answer:

Are there any alternative mechanisms?:

An alternative mechanism might include the ability for elected members of a Local Planning Authority to determine whether or not selected applicants could have a planning application withheld for a given reason.

32 Do you agree that the three build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly?

Yes

Please set out the reasons for your answer:

Slow build out rates and land-banking are particular concerns among communities. Financial penalties are likely to be the most effective measure.

We support publication of national data about developer behaviours.

We support the option for slow build rates by a developer to be a reason for refusal of a planning application.

Do you have any comments on the design of these policy measures?:

## Chapter 6

33 Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

Yes

Please set out the reasons for your answer:

Yes, but our experience with our neighbourhood plan has taught us that "beauty" and "well-designed" are subjective concepts with variation between individuals and they are also influenced by context.

In our experience, communities are more concerned about loss of green space due to development than perceptions of ugliness of development.

34 Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places' to further encourage well-designed and beautiful development?

Yes

Please set out the reasons for your answer:

Yes, but, as in answer to question 33, in our experience, communities are more concerned about loss of green space due to development than perceptions of ugliness of development. In addition, "beauty" and "well-designed" are subjective concepts with variation between individuals and also influenced by context.

35 Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

Yes

Please set out the reasons for your answer:

36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing Framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes?

Indifferent

Please set out the reasons for your answer:

It seems a very specific detail to include in national policy.

If no, how else might we achieve this objective?:

## Chapter 7

37 How do you think national policy on small scale nature interventions could be strengthened? For example in relation to the use of artificial grass by developers in new development?

Answer:

Policies that direct Local Authorities towards use of experts and local knowledge in communities who know the local vegetation and wildlife could strengthen small scale nature interventions.

National policy should discourage artificial grass in gardens. It has a negative impact on biodiversity. A natural grass lawn, even when manicured, provides much greater support for soil health and invertebrate life, which are part of the natural network. Artificial grass requires several base layers of crushed stone and weed matting beneath it.

38 Do you agree that this is the right approach to making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best and most versatile agricultural land?

Yes

Please set out the reasons for your answer:

Food security should be given a high priority. Agricultural land is a precious and finite resource and should be given more weight. Yes, the highest quality agricultural land should be protected from development. Grade 3b farmland should also be protected. It should also be noted that sheep are very efficient at converting very low quality grazing into a highly nutritious food (lamb).

39 What method and actions could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

Answer, including any supporting information:

This link gives examples of how this could be done:

<https://steadystatemanchester.net/2023/01/03/places-for-everyone-the-carbon-impact-revised-figures/>

The Cambridge Local Plan provides an example which assessed the carbon implications of each spatial option considered.

<https://www.greatercambridgeplanning.org/media/1389/gclp-strategic-spatial-options-assessment-implications-for-carbon-emissions-nov2020.pdf>

40 Do you have any views on how planning policy could support climate change adaptation further, including through the use of nature-based solutions which provide multi-functional benefits?

Answer:

To support climate change adaptation, planning policy should require input from independent experts and members of the local community who know the local issues well and will be able to contribute to potential solutions.

There should be further penalties for harm caused to the natural environment and these should be implemented.

## Chapter 8

41 Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

Yes

Please set out the reasons for your answer, including any views on specific wording changes to the existing paragraph:

42 Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

Yes

Please set out the reasons for your answer, including any views on specific wording changes to the existing paragraph:

Yes, provided that they are supported by the local community. The means of assessing community views and the level of supported needed should be defined.

43 Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework?

Indifferent

Please set out the reasons for your answer, including any views on specific wording changes to existing footnote 54:

New paragraph 62 provides that the top 20 most populated cities and urban centres should accommodate an uplift within their area "unless it would conflict with policies within the NPPF and legal obligations". We would support the opportunity for members of such communities to be consulted and have their views heard in any decision making process aimed at intensification.

Do you have any views on specific wording for new footnote 62?:

We would support the opportunity for members of such communities to be consulted and have their views heard in any decision making process aimed at intensification.

44 Do you agree with our proposed new Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

Yes

Please set out the reasons for your answer, including any views on specific wording changes to the proposed new paragraph:

The proposal can be supported in allowing an adaptation of existing buildings to improve energy efficiency. We are also however aware of the lack of affordability for retrofitting houses to meet the required targets. This does not seem achievable without significant financial support.

## Chapter 9

45 Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system?

No

Please set out the reasons for your answer:

Many of the proposed revisions to the NNPF meet some of the calls for change expressed by members of our community.

Local Plans in preparation that have not reached submission stage should be revised in order to comply with the revised NPPF.

If no, what alternative timeline would you propose?:

Local Plans in preparation that have not reached submission stage should be revised in order to comply with the revised NPPF.

46 Do you agree with the proposed transitional arrangements for plans under the future system?

No

Please set out the reasons for your answer:

Local Plans in preparation that have not reached submission stage should be revised in order to comply with the revised NPPF.

If no, what alternative arrangements would you propose?:

Local Plans in preparation that have not reached submission stage should be revised in order to comply with the revised NPPF.

47 Do you agree with the proposed timeline for preparing neighbourhood plans under the future system?

No

Please set out the reasons for your answer:

Neighbourhood planning bodies should have the option to review "made" neighbourhood plans ahead of schedule to ensure that they are compliant with the revisions to the NPPF as and when they come into force.

If no, what alternative timeline would you propose?:

Neighbourhood planning bodies should have the option to review "made" neighbourhood plans ahead of schedule to ensure that they are compliant with the revisions to the NPPF as and when they come into force.

48 Do you agree with the proposed transitional arrangements for supplementary planning documents?

Indifferent

Please set out the reasons for your answer:

As a neighbourhood planning forum, we would rely on our Local Planning Authority (Stockport Council) being in the appropriate position to respond to this question.

If no, what alternative arrangements would you propose?:

## Chapter 10

49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

Yes

Please set out the reason for your answer:

In principle we can agree with the suggested scope and logic for setting out the National Development Management Policies. This would likely substantially reduce time and effort for all Local Planning Authorities who are all struggling at the present time. We would also recommend that Local Plans should not undermine such national policies.

50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

Answer:

We can accept the current principles of the NDMP in particular as enabling Local Planning Authorities to engage more actively with local policy, applications and plan making.

51 Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

Yes

Please set out the reason for your answer:

It is agreed that selective additions should be considered as appropriate. This may enable further policies to be added if Local Planning Authorities need to develop any additions to plans/policies which may be of some national importance.

52 Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

Answer:

Housing need across the whole of England varies widely for a variety of reasons. There is also a need for some other strategic issues to be addressed across the whole of the UK. It is critical that the new Planning systems work together, particularly in its early years.

## Chapter 11

53 What, if any, planning policies do you think could be included in a new Framework to help achieve the twelve levelling up missions in the Levelling Up White Paper?

Answer:

Introducing a new Framework in order to help Levelling up missions is an aspiration, so some form of weighting or priority may need to be given as early exemplars. Some form of weighting could for example be given to certain types of new developments and/or certain types of planning applications as examples of early best practice.

54 How do you think the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?

Answer:

Emphasis on urban regeneration

Funding to support brownfield development.

Encourage green jobs in renewable energy, carbon sequestration and local food production, which will provide productive employment.

55 Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

Yes

Please set out the reason for your answer:

Yes, provided that communities in city and town centres support densification proposals, it is focussed on previously developed land, does not impair the quality of life for residents, harm the character of the area, remove opportunities for urban green space, increase local air pollution or increase local traffic congestion.

56 Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups feel safe in our public spaces, including for example policies on lighting/street lighting?

Indifferent

Please set out the reason for your answer:

We are not sure lighting is particularly helpful. Attacks happen in well-lit urban areas too. Girls and women have always needed to be educated on how to keep themselves safe and avoid risks. Men are vulnerable to attack too. Education is probably a key component for males and females.

## Chapter 13

57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

Answer:

Like any specialist subject, Planning includes jargon and concepts which are unfamiliar to many lay people. With the arrival of the digital age and increased levels of consultation, members of communities are increasingly interested and engaged in the impact of Planning issues on their daily lives. Our Local Authority (Stockport Council) has made welcome efforts online to explain the jargon and processes in Local Plan development. However, more needs to be done to help communities to engage. In our experience, few people who are not professionals in the field of planning, architecture or the building trade are aware of national planning policy and how it affects them. Not everyone in our community uses the internet. We realise that all suggestions to increase awareness, understanding and engagement have time and cost implications for already over-stretched resources. Notwithstanding those limitations, suggestions include presentations in local community halls, recorded presentations to be co-ordinated by local volunteers, hard copy fliers and use of television programmes to reach people in their own homes.

58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

Answer:

With the aim of encouraging community participation in Planning, it will be important to ensure that information is accessible to all sections of society. The majority of people in the Woodford community will not be aware of this consultation on proposed revisions to the NPPF. In our experience, difficult to reach groups include young people who are very busy with jobs and families and people (usually elderly) who do not use the internet or social media. Short messages and consultations in lay language, via digital and non-digital communication routes, plus community training programmes and advisors would help residents understand and engage with the planning process. We achieved a 25% response rate to a hard copy questionnaire during preparation of our neighbourhood plan. As stated in answer to Q57, while we understand resource limitations, suggestions include presentations in local community halls, recorded presentations to be co-ordinated by local volunteers, hard copy fliers and use of television programmes to reach people in their own homes.