

Response to the draft NPPF Changes Consultation by CPRE the countryside charity  
September 2024

The table below sets out the headline response to each relevant chapter and more detailed responses to individual questions raised. Our response includes feedback on the detailed questions from the several CPRE Local, Affiliate and Network Working Groups.

<u>Chapter &amp; Questions</u>	<u>CPRE response</u>
<b>Chapter 1 – Introduction</b>	
<b>Chapter 2 – Policy Objectives</b>	
<b>Chapter 3 – Planning for the Homes We Need</b>	
	<p><b>Headline Response:</b> CPRE does not believe that planning policies for new housebuilding have been effective for many years, and certainly not since the 2008 financial crash. This is in particular because of the growing level of need for genuinely affordable homes in rural areas on the one hand, and the poor locational choices and quality of the housing that has been built, on the other. We evidence this in our State of Rural Affordable Housing report from 2023. (we consider the issue of affordable housing in relation to the proposals in Chapter 6 of the consultation.)</p> <p>We have major concerns regarding the proposals in this chapter. In our view they will serve overall to actively frustrate, rather than deliver, the government’s stated manifesto objective of delivering the ‘biggest increase in social and affordable housing in a generation’, an objective which in principle we support. The restoration of the five-year housing land supply rule and 5% buffer will only benefit large builders, and we have compiled extensive evidence of planning appeal cases showing that large builders will use such a policy to frustrate both the preparation and implementation of local plans by swamping local authorities with speculative proposals in locations seen as locally unsuitable.</p> <p>In principle we support policies to increase average residential densities, as these can help to reduce the need to travel and are particularly appropriate in urban centres and in new towns. In rural and semi-rural settlements, it is critical that higher density development is particularly well designed as poor-quality development can damage the character of those settlements. Sustainable transport and active travel should be factored into all new developments. Some matters such as transport infrastructure should be dealt with at a strategic level.</p> <p>In our view the most effective policy approach the government can take is to implement the recommendations of Sir Oliver Letwin’s Independent Review of Build Out from 2018, particularly those relating to a national policy setting a baseline expectation for delivery of a range of housing types and tenures including social housing in all large development schemes, as well as a rebalancing of power away from large builders and towards local authorities and small and medium sized enterprises in master planning new developments. A wider housing strategy, as the government has promised, will be needed to identify the wider actions needed to deliver the government’s social homes targets, and CPRE is keen to contribute to this in due course.</p>

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
<p>Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?</p>	<p>No.</p> <p>If the government is serious about addressing housing need, which often directly links to affordability, the priority should be the delivery of high-quality homes for social rent. We wish to ensure genuine housing need is planned for in democratically agreed Local Plans. We recommend that:</p> <ul style="list-style-type: none"> <li>• The helpful provisos in Chapter 3, paragraph 6 of the consultation paper about when a lower housing requirement may be justified should be included in the revised NPPF as follows, ‘Authorities would be able to justify a lower housing requirement than the figure the method sets on the basis of local constraints on land and delivery, such as existing National Park, protected habitats and flood risk areas, but should evidence and justify their approach through local plan consultation and examination.’</li> <li>• Government provides clearer direction about the levels of growth that would support wider government policies on housing and industrial strategy. As these policies are still to emerge, clear references or placeholders should be made to them with supporting guidance produced at a later date.</li> </ul> <p>CPRE sees the NPPF revision process as an opportunity to return to a proper local housing need assessment engaging demographers and economists, but most critically in our view involving a clear understanding of, and acting upon, the specific needs of local communities. We recommend the following two-stage approach: stage one a standardised assessment involving primary research into the existing demographic structure of the local population past migration trends and the requirements of local people in identified housing need for the ‘objectively assessed housing need’; and stage two to set a housebuilding target based on integrating economic, social and environmental policy considerations.</p>
<p>Question 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?</p>	<p>No. CPRE does not agree with the removal of the use of ‘alternative approaches’ to assessing need.</p> <p>The proposed Standard Method linked to housing stock is problematic as some areas have high vacancy rates to be addressed and building more of the same will not alleviate local market problems. Existing housing stock has no correlation with housing need, so existing housing stock should therefore not be the basis of the proposed Standard Method.</p>

Chapter & Questions	CPRE response
	<p>Basing the Standard Method on affordability assumptions is also flawed as there is not a simple relationship between releasing more land for housing through the planning system and the affordability of said housing. The Standard Method has not yielded good housing outcomes on the ground. All places have shortages of affordable homes, especially rural areas that are popular with second homeowners and short-term rental landlords.</p> <p>The affordability factor will not deliver the very thing it is supposed to achieve, if housing delivery is left in the hands of a highly concentrated number of private developers.</p> <p>We support the principle of balancing wages and affordability but believe, on the experience of the last ten years, that using an affordability factor to push up housing targets will not deliver housing at a volume and pace that will push down prices – certainly without additional powers to force speedy build-out of permissions that are granted.</p>
<p>Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?</p>	<p>Yes. CPRE would welcome a planning policy that genuinely puts brownfield land first, however we do not think that the current urban uplift is helpful in this regard as it generates unrealistically high urban targets which then encourage developers to seek releases of surrounding countryside in many cases. We believe a strategic city region or county wide approach to target setting that considers projected locally need, the availability of suitable brownfield sites and realistic projections of what can be delivered, is a more appropriate approach.</p> <p>CPRE acknowledges the carbon impact of reusing brownfield sites is lower in centrally located brownfield sites in existing urban areas. The sites benefit from proximity to employment centres and existing infrastructure making it much more sustainable than building out remote green fields without public transport, schools, hospitals and with additional costs for the utilities to be connected such as water, waste treatment, electricity, etc. Remote sites are poorly served by public transport resulting in car-dependency.</p>
<p>Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?</p>	<p>Yes.</p> <p>We are supportive of strengthening expectations that plans should promote an uplift in density in urban areas. Our 2020 Housing Design Audit (<a href="#">Housing design audit for England: report - CPRE</a>) found that, ‘audited design outcomes scored progressively more poorly as projects moved away from the urban core and</p>

Chapter & Questions	CPRE response
	<p>reduced in density, and if they were built on greenfield.’ Further, poorly designed schemes often had ‘little distinguishing personality or ‘sense of place’’. This shows that, contrary to the intent of paragraph 130, lower density developments do not necessarily ensure local character or vernacular is adhered to. In fact, the opposite was true.</p> <p>In line with recommendations from the Housing Design Audit, the NPPF should set a baseline for density levels in large new developments of no lower than 40-50 dwellings per hectare (dph), with local authorities actively encouraged to go further still and be more prescriptive in Local Plan policies and Design Codes. This approach, advocated by the Office for Place chair Nicholas Boys Smith, would be an improvement on recent practice (as evidenced by government land use change statistics on residential densities) and consistent with the intention of NPPF Section 11 Making effective use of land.</p> <p>We would also support an explicit link between public transport accessibility and density levels in national policy. Research undertaken by CPRE Local Groups supports this aim (<a href="#">DoubleTheDensityHalveTheLandNeeded_1.pdf (cprelondon.org.uk)</a>).</p>
<p>Question 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?</p>	<p>Yes. CPRE supports vision-led master planning and use of local design codes to achieve greater density, where appropriate.</p> <p>Greater density is helpful in terms of reducing travel distance. It should improve the patronage and viability of bus services and encourage active modes. It reduces sprawl onto green fields – typically in car dependent locations. It should therefore be the norm for totally new settlements. However, existing settlements require a more nuanced approach. Whilst it is important to achieve high densities in urban areas as a rule, it is also important to recognise that it is not appropriate to impose them across the board. Within any one settlement, even within villages, there can be a variety of character areas. Design codes need to recognise this fact. They also need to describe the nature of the roads in the various areas, eg. rural lane with no kerbs, which helps to set the scene.</p> <p>CPRE has advocated neighbourhood plans to help local areas retain local distinctiveness and to ensure for beautiful place making.</p>

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
<p>Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?</p>	<p>No. CPRE has major concerns that the proposed changes, reinstating the primacy of a five-year housing land supply, will prove to be ineffective in their own terms. Moreover, they will exacerbate the current problem of developers arguing land with extant permission out of a local five year housing land supply by claiming it has become unviable or undevelopable. Due to market absorption rates, developers control the speed of homes coming on to the market to maintain high property prices. It is in developers interests not to build more quickly and to manipulate housing supply, as evidenced in the 2018 Housing Review led by Siir Oliver Letwin. This is because if LPAs fail the Housing Delivery Test, they are likely to achieve approval on land that otherwise would not be consented. Where is the power to enable LPAs to ‘force’ delivery within a given timeframe - or if a permission is not built out, to remove permissions?</p> <p>CPRE recommends that a clearer definition of sustainable development be provided, specifically that the proposed addition to NPPF11 (d) (ii) on design, location and affordability is a routine expectation and is followed through in local plan allocations and post-development monitoring. We would also recommend that the wording of NPPF11(d)(ii) makes clearer that there is a burden of proof on developers to show that a proposal would positively add to sustainable development; not merely one on local authorities to demonstrate that it would not.</p> <p>Sustainable development is not defined but it is said to comprise three objectives. The three objectives seem to be weighted so that in most cases the ‘economic’ objective is given priority over the social and environmental objectives. This effectively ignores Paragraph 7. The consultation document states that it wishes to improve the operation of ‘the presumption’ in favour of sustainable development, to ensure it acts an effective failsafe to support housing supply. That indicates that housing supply, purely numbers, not delivery, will prevail over all other considerations and that precludes the need to reduce carbon/ greenhouse gas emissions from housing and transport, and to ensure the sustainable travel hierarchy is implemented.</p> <p>Rather than focusing on LPA performance and land availability, CPRE also recommends that the wording of NPPF11 should be changed to place more emphasis on developers’ roles, alongside local planning authorities, in helping the timely adoption of local plans through constructive engagement and requiring land allocated for residential to be consented and completed in a timely fashion. It should also be noted that local planning authorities do not currently have the capacity or access to land to deliver large amounts</p>

Chapter & Questions	CPRE response
	<p>of housing themselves and continued imposition of high targets for housing provision is both ineffective and damaging while this situation remains.</p>
<p>Question 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?</p>	<p>No. Not unless our recommended changes to the presumption (see question 6 above) are made, and there is the use of a robust assessment for housing needs and supply and the current NPPF79 (draft revised NPPF77) allowing developers to argue the most sustainable allocated sites out of the supply is also revised as per our recommendation below.</p> <p>We have major concerns regarding this proposal. In our view they will serve overall to actively frustrate, rather than deliver, the government’s stated manifesto objective of delivering the ‘biggest increase in social and affordable housing in a generation’, an objective which in principle we support. The restoration of the five year housing land supply rule and 5% buffer will only benefit large builders, leading to speculative proposals for development in what would normally be seen as unsuitable locations.</p> <p>Factoring sustainable transport and active travel modes into new developments should be considered to be essential infrastructure.</p> <p>CPRE recommends that the wording of new NPPF77 (on the Housing Delivery Test) should be revised to only apply the presumption where the local planning authority decides to do so, and only allowing its use in appeals when there is a long (at least five years) record of under delivery or a long-term absence of an up-to-date plan. Otherwise, it will often be extremely difficult for a LPA to demonstrate adequate supply and creates costs for local planning authorities often running into millions of pounds if they have to defend their refusal of unsuitable sites at appeal. It is reasonable in principle to expect LPAs to review local plans every five years and to demonstrate a 5-year supply of housing land on an annual basis, provided additional resource is allocated to planning departments to do so. But in our view, it is unreasonable to allow developers to challenge the supply at local plan examinations or on an ad hoc basis through planning appeals, once the developability and deliverability of an allocated site, and supporting public funding where needed, has been agreed.</p> <p>CPRE recommends that the Housing Delivery Test should be further changed to provide breakdowns of overall houses completed, affordable housing based on a definition linked to people on average salaries paying no more than 35% of their salary on rent, a definition already used in policy in the West Midlands;</p>

Chapter & Questions	CPRE response
	<p>and also brownfield completions to keep the focus on genuinely affordable housing stock and on reusing wasted land resources.</p> <p>LPAs are still fundamentally dependent on landowners being ‘incentivised’ through land value uplift to bring land forward. Our feeling is that LPAs will need further powers to support a more muscular approach to assembling land where it is most needed, through greater use of compulsory purchase and doing away with hope value.</p>
<p>Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?</p>	<p>No.</p> <p>If an LPA has an up-to-date Local Plan and has met their Housing Delivery Test requirements, they should not be required to permit development on additional greenfield sites to demonstrate a five year housing land supply.</p> <p>To illustrate, Cheshire West and Chester Council was observed by the Housing Delivery Test 2022 to have delivered 4,764 completed homes against a target of 1,524, which is a whopping 313% over-performance. Yet, the new proposed stock based standard method will incur an increase of 1,485 dwellings, from 532 dwellings to 2,017, which equates to a 279% increase. This scale of change is excessive, especially as much of the council area is rural and affluent, and the additional development would not lead to the regeneration of brownfield sites and/or more deprived areas. The government should offer a carrot as well as a stick to ensure that planning delivers more stability, and confidence in the development industry to invest.</p> <p>Overall, this points to a greater need for Local Authorities to be delivering housing directly, and rebalancing housing delivery away from big housebuilders.</p>
<p>Question 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?</p>	<p>No. CPRE does not agree all LPAs should add a 5% buffer to their housing land supply. CPRE accepts where there is an under-supply a buffer should be added, but this cannot be against requirements based on use of out-of-date Office of National Statistics 2014 data, which was predicated on high growth which has never materialised. Also, the proposed standard method based on the flawed ‘affordability calculation’ leads to inaccurate housing targets. CPRE recommends the return to a more robust quantitative assessment of local housing need using primary research, and based on this, authorities can be performance checked. Current</p>

Chapter & Questions	CPRE response
	<p>practice for the most part is that private developers complete houses rather than local authorities. Unless and until the development model for large sites is changed in the way we believe it should, it is developers who should be monitored in terms of bringing forward homes in a timely fashion and sanctioned if they do not complete consented schemes in an equally timely fashion. Furthermore the Housing Delivery Test policy (current NPPF77) allowing developers to argue sites out of the land supply should be revised as per our response to Question 7 above.</p> <p>Arbitrary additional ‘buffers’ are not supported by evidence and they create more demand for more supporting new infrastructure, including more highway provision.</p> <p>We have major concerns regarding this proposal. In our view they will serve overall to actively frustrate, rather than deliver, the government’s stated manifesto objective of delivering the ‘biggest increase in social and affordable housing in a generation’, an objective which in principle we support. The restoration of the five year housing land supply rule and 5% buffer will only benefit large builders, leading to speculative proposals for development in what would normally be seen as unsuitable locations.</p> <p>This points to a need to change the development model, with a greater role for local authorities in planning, developing and delivering homes, esp. for social rent, themselves.</p>
Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?	No. (See responses to earlier questions in this chapter for reasoned justification.)
Question 11: Do you agree with the removal of policy on Annual Position Statements?	Yes. CPRE recognises that most LPAs can keep the housing land supply under review in other more cost-effective ways, due to the weight given to housing delivery and the need to perform against the Housing Delivery Test.
Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?	Yes. A proper approach to strategic planning, which in CPRE’s view could be based on city or county regions or be cross-border where there a historic practice of strategic planning over that geography, should be included in the NPPF. CPRE would be interested in talking to officials to discuss effective new mechanisms for cross-boundary strategic planning with regard to net zero, housing, jobs, infrastructure, growth plans



<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
	<p>and nature recovery including Local Nature Recovery Strategies and networks. CPRE is supportive of sub-regional level Spatial Development Strategies.</p> <p>We would recommend that Mayoral Combined Authorities be required to involve a wide range of stakeholders and the public when consulting on new spatial strategies and this should be built into the timescale for adoption.</p>
<p>Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?</p>	<p>Yes. We agree that the tests of soundness should be amended to better assess the soundness of strategic scale plans or proposals. Evidence demonstrates that the current approach is not supporting long term, strategic growth.</p> <p>An example of this, is the Greater Manchester ‘Places for Everyone’ Joint Development Plan examination. During examination developers stated that they would not be able to achieve the policy aspiration for affordable housing, infrastructure and other needed development to make the development viable.</p> <p>Bedford Borough Council’s local plan examination was also paused in March 2024 as the Planning Inspector was concerned about the delivery of strategic infrastructure and the build-out rate of new Garden Village settlements.</p> <p>Soundness tests should consider the timelines for the delivery of Development Plans with the timelines of delivery for necessary infrastructure.</p>
<p>Question 14: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>Neighbouring LPAs should be strategic stakeholders and required to comment on emerging local plans, particularly at Regulation 19 stage.</p> <p>CPRE believes that still more needs to be done to compel developers to develop their land banked sites in a more timely fashion. According to the Competition and Markets Authority (November 2023) the 11 largest housebuilders own or control an estimated 1.17 million land plots with planning permission across more than 5,800 sites in Britain that have not been built out. The government should insist that these land banked sites are built out before any new sites are allocated.</p> <p>CPRE local groups have argued consistently for the phasing of housing whereby existing allocations have to be developed first. Phasing of sites in this way should be included in a reformed NPPF.</p>

Chapter & Questions	CPRE response
	<p>The NPPF should also more effectively encourage the regeneration of inner cities (and protect countryside from development) by encouraging the well-designed conversion of redundant office and retail space into residential usage, but the government should also revoke or substantially reform the permitted development rights that have led to poor quality conversions in recent years.</p>
<p><b><i>Chapter 4 - A new standard method for assessing local housing needs</i></b></p>	
<p><b>Headline response:</b> We particularly disagree with the elements of the proposed new method which simplistically equate increasing the affordability of housing with increasing planned levels of supply in each area. Given the dominance of the big six housebuilders and their control over the rate at which suitable housing land is developed, this assumption is fundamentally flawed and has been patently ineffective in the ten years or so since it has been established in planning policy. Regardless of whether the new method is taken forward, CPRE recommends that the government makes clear that while housing target setting is a requirement, the use of the standard method is not mandatory and that the requirement should be varied based on specific local needs and constraints.</p> <p>As with housing target-setting, CPRE believes that a much greater role needs to be played by local authorities in ascertaining the level of genuine need for social and other forms of housing in their area, and a greater emphasis in planning policy on making sure this genuine need is met. Alongside this less weight should be given to simply meeting market demand, which is an inappropriate strategy in most rural areas given that large, high priced new homes will not be affordable to people on average incomes or below. We researched this area in detail in a 2019 report and we plan to update aspects of the analysis, in the specific context of rural areas, in the coming months.</p> <p>The proposed new standard method is deficient. There is no guarantee and little likelihood that the market will provide the increased number of homes being demanded and the formula does not appear to have taken into account sufficiently how much new infrastructure (including new roads) would be required and the impacts on climate change.</p> <p>A seminar held by CPRE in September 2024, and attended by a cross-section of experts from the planning sector, also concluded that:</p> <ul style="list-style-type: none"> <li>• Government should reverse its mooted exclusion of new towns from local housing targets. This would encourage local public support for the placement of these new towns. Strategically planned new developments (urban extensions as well as new towns) are likely to be less damaging than regular incursions and nibbling into the countryside.</li> <li>• There is a clear continuing requirement for a standard method of calculating housing need in order to help increase supply, but the method proposed by government is insufficiently supported by demographic or housing market evidence. The method needs to be transparent and based on robust data in order to command public acceptance.</li> </ul>	

Chapter & Questions	CPRE response
<ul style="list-style-type: none"> <li>Net zero needs to be factored into housing targets and the planning system. Stronger and more closely monitored sustainable development standards for new developments are needed, including more ambitious and closely monitored building regulations, overall increases in residential densities, better connectivity with social facilities and more attention given to flood mitigation.</li> </ul>	
<p>Question 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?</p>	<p>No. CPRE believes that having an agreed standard method for providing an initial indication of how to meet housing need is necessary, but we believe that the current Standard Method is flawed and has not yielded the desired outcomes. Unfortunately, the proposed Standard Method based on housing stock is more flawed still. There is no guarantee that the market will provide the increased housing numbers required and the formula does not appear to have sufficiently taken account of the need for upgraded and new infrastructure, the funding of this (developer contributions?) or the environmental impact of the uplift.</p> <p>Under the new formula, London sees a reduction of -18,129 homes, equal to -18.3%. The most spectacular hike is in Redcar and Cleveland with an increase from a change in the standard method proposed equating to 1,338%.</p> <p>When considering rural areas, such as Wyre and Lancashire District two rural areas of Lancashire, we see housing numbers to be planned have increased by 127% and 68%, despite them over-performing by 232% and 149%, respectively, according to the Housing Delivery Test, 2022. Burnley has a current housing target of 51 dwellings, and this would increase to 369 dwellings, and increase of 625%.</p> <p>As set out above in answer to question 1, planning enough homes warrants a proper local housing need assessment based on primary research.</p> <p>Some areas have experienced out migration of younger cohorts of people and the death rate exceeds the birth rate. We need to understand where all the people would come from in areas such as the ones we mention; unless the Government is going to encourage migration it is difficult to see what the source of additional households to all parts of the country. When a household relocates a house is vacated so there is no sum gain.</p> <p>However, we do think it is welcome that the increases in housing targets implicitly place greater value on housing in the North of England than the previous formula. We would like to see greater consideration</p>

Chapter & Questions	CPRE response
	<p>given to the economic rebalancing of jobs towards these locations, with a resulting calming of the overheated South East economy.</p> <p>CPRE believes the Housing Delivery Test should be broken down into overall houses completed, affordable housing based on a definition linked to people on average salaries paying no more than 33% of their salary on rent, as evidenced in the 2024 UK Housing Review; and also brownfield completions to keep the focus on genuinely affordable housing stock and on reusing wasted land resources.</p>
<p>Question 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?</p>	<p>Yes. Relying on house price to earnings is a better indicator of affordability. The definition of starter home at 80% market value in rural places is unaffordable to most people. CPRE recommends that there should be a greater focus on providing housing for social rent. For example, a recent exercise undertaken by CPRE Hertfordshire using publicly available data, found that no average earning household in Herts can afford to buy an average priced house in the County from their own resources.</p>
<p>Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?</p>	<p>No. The Standard Method based on affordability assumptions was flawed as people do not only buy houses to live in, but they also hold them as investments. The Standard Method has not yielded good housing outcomes on the ground. All places have shortages of affordable homes, especially rural places, which are popular to second home owners.</p> <p>The Government should consider ways to discourage multiple home ownership, especially when property is withheld from the market, and not available for occupation for long periods of time, causing local communities to lack economic activity.</p> <p>Our evidence points to the fact that the affordability ration has had the perverse incentive of encouraging developers to build above the median house price. This is because the more the median house price increases relative to salaries, the more the target for future house building is increased in order to provide affordable homes, which are often not built anyway.</p>

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
<p>Question 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?</p>	<p>Yes. This evidence should be gained through primary research by local planning authorities looking at the availability and other issues relating to the rental sector in their local area. Many rural areas have been particularly affected by the growth in second homes and short term lets, which have served to considerably reduce the availability of housing for rent and therefore increase overall rents.</p> <p>The proposed standard method is entirely inappropriate for local planning authorities with large areas of designated protected countryside and is bound to fail.</p> <p>In the end, addressing this requires focus on social rent, as well as looking at other non-planning remedies. These are beyond the scope of our expertise, but further analysis on remedies up to and including rent controls for the private sector should be explored.</p>
<p>Question 19: Do you have any additional comments on the proposed method for assessing housing needs?</p>	<p>Regardless of whether the new method is taken forward, CPRE recommends that the government makes clear that while housing target setting is in itself a requirement, the use of the standard method in reaching such a target is not mandatory and that the actual housing requirement should be varied based on specific local needs and constraints. A two-stage method is desirable and reliance on up-to-date population data to better plan for people is important.</p> <p>The fact the housing-stock based standard method needs adjustment for London is testament to how bizarre it is, and we believe that there is little scope in many rural areas for all the houses planned to be delivered in a way that meets identified need.</p> <p>The crude application of supply and demand micro-economics does not recognise that housing is held as a capital investments and new housing is bought for the value increases. In Manchester there has been a property development boom, yet housing waiting list have increased as new homes are bought by overseas investors or pension companies and not offered for occupation by long-term tenants, rather used as Short Term Lets.</p> <p>CPRE is however supportive of the 30% target increase for Mayoral Combined Authorities as they are focused on transport hubs, have swathes of brownfield development and can have buildings at height and achieve higher densities in town and city centres.</p>

Chapter & Questions	CPRE response
	<p>We particularly disagree with the elements of the proposed new method which simplistically equate increasing the affordability of housing with increasing planned levels of supply in a given area. Given the dominance of the big six housebuilders and their control over the rate at which suitable housing land is developed, this assumption is fundamentally flawed and has been patently ineffective in the ten years or so since it has been established in planning policy.</p>
<b>Chapter 5 - Brownfield, grey belt and the Green Belt</b>	
<p><b>Headline response:</b> CPRE are pleased to see the proposed move towards a ‘brownfield first’ approach. We have provided evidence with this response that brownfield development provides a wide range of public policy benefits, including economic cost savings and widespread public support. We believe that the government should clearly prioritise the development of suitable brownfield land in its funding support for new development. New housing developments should be directed to brownfield sites first, with research from CPRE demonstrating there is sufficient suitable brownfield capacity to deliver 1.2 million homes. (CPRE State of Brownfield Report, December 2022, based on local authority brownfield register data.)</p> <p>We do not agree with the proposed alterations to the ‘exceptional circumstances’ test for releasing Green Belt land for development through the local plan process. Counsel opinion provided with this response highlights that these alterations will fundamentally undermine the concept of permanence which is central to both Green Belt protection as well as to any future policies to enhance the benefit of the land for nature and people. Based on discussions with the wider planning sector, including the housebuilding industry, we would recommend that there should be a strategic, Green Belt-wide approach to Green Belt reviews underpinned by a shared methodology, including templates and question prompts, to be used by all local authorities. This would make the process more transparent, as well as reduce the scope for consultancy firms to use different methods.</p> <p>We do not agree with the proposed re-classification of Green Belt land as so-called ‘grey belt’ land and we urge the government to abandon the proposal to use it in planning policy. Counsel opinion provided with this response has highlighted that the proposed definition of ‘grey belt’ is too subjective and will open up scope for land speculators to drive through damaging developments through the planning appeals process, without any guarantee that planning permission will be granted for development in sustainable locations. Nonetheless we support the re-use of previously developed land or brownfield land (based on the current planning policy definition of the term) within England’s Green Belts, where sites are in sustainable locations e.g. near to public transport, existing settlements and services.</p> <p>We do not agree with the proposed widening of the test for ‘very special circumstances’. The central point of the planning function of Green Belts is that they are strategic, plan-led, and that any changes to them should be strategic and plan-led provided the current exceptional circumstances test is met.</p>	

Chapter & Questions	CPRE response
	<p>We wholeheartedly support the ambition to achieve 50% affordable housing on sites released for housing development on sites released from the Green Belt. But this policy should apply across England as there is an acute need for affordable housing everywhere. We have concerns around the proposed wording and viability tests.</p> <p>With regards to new paragraph 155, it is difficult to see how contributions from sites already permitted via development management would deliver the new requirements. It is also unclear how 50% affordable housing will be achieved if Benchmark Land Value (BLV) must still allow for an ‘appropriate premium for landowners.’ Who determines what ‘appropriate’ or ‘proportionate’ is? As currently worded, there is potential that ‘grey belt’ sites could become a fairly lucrative prospect for landowners in the future, rather than delivering the affordable homes we desperately need.</p> <p>A seminar held by CPRE in September 2024, and attended by a cross-section of experts from the planning sector, also concluded that:</p> <ul style="list-style-type: none"> <li>• Greater clarity of definition around the ‘grey belt’ would be necessary in order to avoid unintended consequences, such as extensive, expensive and counterproductive litigation around whether or not land falls within the definition and therefore can be developed.</li> <li>• A shared methodology for Green Belt reviews (including templates and question prompts) to be used by all local authorities would make the process more transparent, as well as reduce the scope for consultancy firms to use different methods.</li> <li>• The Green Belt has been a successful policy aimed at both protecting the countryside and preventing urban sprawl – in this second context, the Green Belt containing land that isn’t ‘green’ but isn’t housing shouldn’t automatically be considered a failure. A public awareness campaign about the functions and purposes of the policy would help provide a clearer understanding of how the policy should work.</li> </ul>
<p>Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?</p>	<p>Yes. CPRE is pleased to see the proposed move towards a ‘brownfield first’ approach, prioritising the development of previously developed land. We believe however that the government should go much further and, in its various funding schemes for regional development and supporting new housing, prioritise support to new housing developments on brownfield sites in preference to greenfield. Research from CPRE demonstrating there is sufficient brownfield capacity to deliver 1.2 million homes on ‘shovel ready’ sites. (CPRE State of Brownfield Report, December 2022.) We also know that delivery of developments on brownfield sites has been, on average, a full six months quicker than greenfield counterparts, with large sites of +250 units taking on average 96 weeks less to complete. (CPRE - <a href="#">_Brownfield_comes_first_March_2016.pdf</a>)</p> <p>For this response, CPRE commissioned the University of the West of England to carry out an evidence review explored the social, environmental and economic impacts of brownfield development. The full review will be published on our website and we will send it to officials. To summarise here, the review</p>

Chapter & Questions	CPRE response
	<p>found a raft of benefits from redeveloping brownfields, partly from removal of a nuisance, and partly from positive impact of more sustainable forms of development and impacts of regeneration. There is also evidence that brownfield redevelopment provides economic benefits in terms of increased house prices and externalities through removal the nuisance of a brownfield and potential agglomeration effects of increased population and economic activities.</p> <p>Also, because brownfield redevelopment is more likely than greenfield to be sustainable in terms of minimising land take (i.e. high density, mixed use) that it avoids the disbenefits from greenfield development, in particular reduced costs in terms of infrastructure, utilities, and development and for the residents in energy, water and transport; and increased viability of public services in the urban areas. American case studies show that urban brownfield developments accrued savings of \$150 per year in lifestyle costs (e.g. transport) compared with greenfield developments. The RTPi (2024) has very recently found that if the target of 300,000 new homes per year was met through well-designed development the economic value over next 10 years would be more than £50.4bn (£63.8bn if 380,000 homes were delivered). If these homes increased the density of cities, which would likely be predominantly through brownfield redevelopment, this could add a further £23bn (£29.5bn if 380,000 homes were delivered) in economic benefits via agglomeration effects (RTPi, 2024).</p> <p>Crucially, there is evidence that brownfield development receives greater public support, although this is linked to the quality of the development and the benefits it provides to the existing community beyond simply reusing the land, for example, by provided amenities, greenspaces and opportunities for active travel.</p> <p>We have yet to see the detail of what brownfield passports might involve. A process that helps to reduce the risk of development, along the lines of the ‘planning passport’ approach proposed for rural exception sites, could be helpful. CPRE does not a support a presumption in favour of brownfield land if it results in building in isolated, unsustainable locations in the countryside. Requirements for local services such as schools, shops, decent bus services, employment opportunities and green spaces, would lead to more private car travel in such cases. Also, regard must still be given to heritage, ecological and biodiversity constraints as well as transport, flood risk and the value of nationally and locally designated landscapes. Brownfield sites in many rural locations need a very sensitive approach, and are unlikely to deliver the same</p>



Chapter & Questions	CPRE response
	<p>volume/density of properties, as those in more urban locations. When determining applications for new homes on brownfield sites, the requirement for technical evidence to support new development should not be weakened.</p>
<p>Question 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?</p>	<p>No. We note the proposed use of the word ‘substantial’ here in relation to any harm that might be caused to the Green Belt. This leaves open to interpretation what is ‘substantial’. It is not possible to support this wording without a better understanding/definition of what is meant by it. Is the provision of a new/improved road ‘substantial’? We also believe that the current strong expectation of providing affordable housing on PDL sites within the Green Belt should be retained.</p>
<p>Question 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?</p>	<p>No. We do not support expanding the definition of PDL to include glasshouses, due to the importance of maintaining food production, and also because for the most part glasshouses are not in a suitable location for other forms of development. We also believe that it is illogical and inconsistent to include residential gardens within the definition of PDL in rural areas (including Green Belts), but not within urban areas.</p>
<p>Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</p>	<p>No. We do not agree with the proposed definition for ‘grey belt’ land. Counsel opinion provided with this response has highlighted that the proposed definition of ‘grey belt’ is too subjective and will open up scope for land speculators to drive through damaging developments through the planning appeals process, without any guarantee that planning permission will be granted for development in sustainable locations. It remains unclear in the first instance whether this would constitute a re-classification of green belt land, or if it would be another policy designation. Neither the draft version of the NPPF nor the accompanying guidance within the consultation document provides the level of clarity required to understand how the proposed approach would work in practice.</p> <p>In the first instance, the use of the word ‘Belt’ is misleading and inappropriate as the new categorisation is not intended to surround or encompass anything. The proposition is that the term should apply to any (random) parcel of Green Belt land that is regarded as being of ‘low quality’, as having little ecological value and/or as being inaccessible to the public could be re-designated as ‘Grey Belt’ and therefore deemed potentially suitable for development. This is regardless of the fact that none of these criteria are relevant to</p>

Chapter & Questions	CPRE response
	<p>the Green Belt principles. Clearly, a danger of declaring random pockets of Green Belt land as suitable for development is that many are not going to be accessible by sustainable transport methods and the majority will not have existing connections to utilities and other services. Some would undoubtedly require new or expanded roads to be built across 'higher quality' Green Belt and/or across other designated areas or open countryside. The whole proposition of 'Grey Belt' simply does not stand up to scrutiny.</p> <p>We are concerned that the proposed changes will lead to legal challenges, slowing down rather than speeding up housebuilding within Green Belt areas. As currently proposed 'grey belt' policy will lead to difficulties at local plan examination and lengthy, expensive appeals from developers if refused.</p> <p>We recommend that the government should instead make clear that suitable brownfield sites for development within the Green Belt should be identified via the Local Plan process, and removed from the Green Belt where it is not necessary to keep the land open, as is already established policy. Any alternative approach is simply likely to encourage a flood of speculative applications on sites which developers/landowners think meets the definition.</p> <p>We would also suggest a change to proposed part iv) in the definition to '<u>Land which contributes little to preserving the setting and special character of historic towns and villages</u>' [suggested change underlined].</p>
<p>Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?</p>	<p>Yes. CPRE recommends the removal of permitted development rights that apply to the conversion of agricultural buildings within the greenbelt. Any high level green belt sites that are to be considered for release should be required to demonstrate that their current use is no longer viable.</p> <p>We see real dangers of high performing Green Belt being degraded to meet 'grey belt' criteria. We view this as a real issue with serious consequences if it is not addressed in the NPPF, thus we recommend that the revised NPPF only supports the development of sites where the established and permitted use clearly falls within the current definition of brownfield or previously developed.</p>

Chapter & Questions	CPRE response
	<p>The deletion in the new draft NPPF of the former Footnote 64 which gave Planning decision-makers scope to protect agriculture, both in the Green Belt and elsewhere, must be reversed. (See response to questions 82 and 83 below.)</p>
<p>Question 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?</p>	<p>Yes. Additional guidance or ‘model methodology’ on progressing Strategic Green Belt reviews would be helpful, but not based on the ‘grey belt’, which, as set out above, is problematic. Any guidance should be contained in Planning Practice Guidance rather than policy.</p> <p>Guidance should be focussed on the 5 purposes as well as wider sustainability factors, protected habitats etc. This would save time and expense as at present some individual local authorities tend to devise their own method from scratch.</p> <p>It should be made clear in the NPPF that Green Belt reviews should (depending on the geography of the area) be undertaken strategically i.e. across several LPAs or at least fully take account of the strategic role of Green Belts e.g. in encouraging urban regeneration, and any cross-boundary implications of individual Green Belt parcels.</p>
<p>Question 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?</p>	<p>Yes. As stated above, CPRE recommends that strategic reviews covering the entire Green Belt are the most appropriate way to determine which parcels of land make a more limited contribution for the purpose of release. CPRE also recommends that it is of critical importance that such reviews should cover the whole 15 year plan period. The question of whether Green Belt release is needed should not be re-opened at every plan review.</p> <p>Counsel opinion received by CPRE raises (at paragraphs 10-12) fundamental questions as to whether the proposed guidance is sufficient in terms of maintaining the integrity of Green Belt policy. In particular:</p> <ul style="list-style-type: none"> <li>• The formula in draft NPPF142 of whether a site ‘fundamentally’ undermines the function of the Green Belt ‘across the area of the plan as a whole’ will be a fruitful area of challenge for landowners and developers unless it is made clearer as to when such circumstances apply.</li> <li>• The draft guidance is also likely to pressure local planning authorities into releasing far more land which performs well against multiple Green Belt purposes.</li> </ul>

Chapter & Questions	CPRE response
	<ul style="list-style-type: none"> <li>The overall effect of proposed NPPF142 will be to require a constant state of Green Belt review, completely in contradiction of the fundamental quality of permanence.</li> </ul> <p>Land released from Green Belt should be master-planned based on ‘vision-led’ approaches and designate Local Green Space where there is demonstrable benefit for local amenity and wildlife.</p>
<p>Question 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?</p>	<p>Yes. CPRE welcomed the introduction of Local Nature Recovery Strategies (LNRS) and believe they have an important role to play in ensuring that nature improvement areas are created or remain intact. Green Belt land is already of increasing importance to nature recovery. 39% of all England’s local nature reserves (LNRs) are on Green Belt land, and 60% of all the LNRs created since 2010.</p> <p>However, current policies focus on biodiversity within a site, not on the wider impacts of development on the integrity of nature recovery areas or corridors. This is a particular issue when the developer proposers to offset the loss of biodiversity at a remote location.</p> <p>CPRE have separately been calling for an integrated land use strategy and would like to see LNRS’s considered within any future strategy to ensure a joined-up approach with other policies such as Green Belt.</p>
<p>Question 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?</p>	<p>No. CPRE strongly supports a move towards greater prioritisation of brownfield sites or a ‘brownfield first’ approach. To achieve this the NPPF will need to place a greater onus on local planning authorities to identify brownfield sites for development. CPRE recommends a new national target for brownfield development, and we also support calls made by the campaign Don’t Waste Buildings for further changes to NPPF158 to prioritise re-use and retrofit of existing buildings . We recommend that the government should clearly give precedence to the development of suitable brownfield land in its funding support for new development.</p> <p>We are broadly supportive of a sequential process with brownfield land first, with a preference for urban PDL over that in the Green Belt. However, there is a danger, as currently worded, that there will be significant pressure to release greenfield Green Belt land, which clearly meets one or more Green Belt purposes, to meet housing ‘need’ under the government’s proposed new standard method (see our responses to Chapter 4). Although the NPPF states that the Government attaches great importance to the</p>

Chapter & Questions	CPRE response
	<p>Green Belt, proposed paragraph 142 refers to Green Belt boundaries being modified ‘only where there are exceptional circumstances’, including circumstances where housing, commercial or other development needs cannot be met. We have concerns that large areas of well used recreation land, productive agricultural land and valuable nature habitats will be released for development under the proposals, even when this land performs well against the five purposes.</p> <p>The scope for losing ‘higher performing Green Belt’ is illogical, runs counter to the Government’s previous statements and should not be taken forward. The proposal to develop higher performing Green Belt must, therefore, be removed from paragraph 152b. The Green Belt has important amenity value – it’s often the countryside on people’s doorstep, where they can walk their dogs, go for a walk, experience nature etc. Weakening Green Belt protection is therefore likely to deprive especially poorer people (who often can’t afford to travel far) of these opportunities.</p> <p>See also response to question 29 below regarding methodology for Green Belt reviews.</p>
<p>Question 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?</p>	<p>No. CPRE does not want the function of Green Belt to be undermined and instead, would like to see innovative proposals for enhancing the Green Belt rather than releasing land for development.</p> <p>Counsel opinion has highlighted that it is unclear what ‘fundamentally undermining the function of the Green Belt across the plan area’ will mean in practice. It is highly unlikely that the release of a small Green Belt site could be argued to undermine the whole of the Green Belt. The Metropolitan Green Belt, for example, is 5,160 sq/km and would unlikely be impacted by the release of 1 small site. However, the cumulative impact of releasing several sites would ultimately undermine the function. CPRE recommends the provision of a clear methodology for Green Belt reviews, to include reference and consideration given to the cumulative impact of any release.</p> <p>If the Government wish to take this forward, the proposed wording should be changed to recognise the impact of releasing a site on the immediate surrounding area as well as the whole of the Green Belt. ‘Wider’ or ‘surrounding’ areas are often defined in Green Belt reviews as ‘Parcels’ separated by natural or physical features. Where sites within the Green Belt perform well against at least one of the five purposes they should normally be retained and protected by policy.</p>

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
<p>Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?</p>	<p>No. We strongly disagree with the Government’s suggested approach in paragraph 152. Currently the NPPF allows strategic review of the Green Belt when local plans are updated, and development should be planned. We do not support the use of ‘grey belt’ as a policy concept and the proposed scope to be able to apply it through decision making causes particular problems, as Counsel opinion has highlighted. Allowing developers to identify ‘grey belt’ via the planning application process will only encourage a flood of speculative applications, causing further resource problems for overstretched local planning authorities.</p> <p>For genuinely beneficial proposals submitted outside the plan process, the existing policy is sufficient. Whether a site is brownfield will be a factor anyway in considering the “planning balance” in such cases. Introducing a new route for developers to designate “grey belt” just complicates this process. We do however agree that Local Plans should be prepared promptly.</p>
<p>Question 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?</p>	<p>Yes. We do not agree with the new Paragraph 152 wording indicating that not only housing, but also “commercial and other development” should not be regarded as inappropriate in the Green Belt. This is far too broad in its potential application and CPRE recommends that it should be withdrawn.</p>
<p>Question 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?</p>	<p>Travellers’ sites should be treated equally as other residential sites through a local needs assessment, focus on alternative land, where justified through a strategic review of the Green Belt.</p>
<p>Question 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?</p>	<p>Travellers’ sites should be treated equally as other residential sites through a local needs assessment, focus on alternative land, where justified through a strategic review of the Green Belt.</p>
<p>Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?</p>	<p>Yes. We agree in principle, however the detailed proposal is insufficient. We strongly support the delivery of genuinely affordable housing and welcome the ambition for 50% of all new homes to be affordable. However, it is unclear what the evidential basis for the 50% target on ‘grey belt’ land is. It is also highly inconsistent to require 50% affordable housing on land released from Green Belt but not on other</p>

Chapter & Questions	CPRE response
	<p>greenfield sites e.g. on urban greenspace or on greenfield sites around towns/cities which have no Green Belt. The target should be applied equally across England, as affordable housing need is great everywhere, not just within Green Belt areas.</p> <p>We also recommend a target applied for the delivery of social rented homes specifically, as this is where need is greatest, particularly in rural areas.</p> <p>Whilst we understand the rationale for removing the 10% target for affordable home ownership, we are very concerned that without a minimum figure, developers will continue to be allowed harmful developments without the benefit of affordable or social housing.</p> <p>It is understood that most local planning authorities seek higher affordable housing contributions and an appropriate proportion of Social Rent, however the ability of developers being able to renege on affordable housing contributions after consent is troubling. It seems inequitable that while affordable housing contributions are often reneged upon that the annual profits of the largest developers have sky-rocketed year on year. The revision of the NPPF should prevent such dysfunction in the future.</p> <p>Developers should not be able to argue down the level of affordable housing on viability grounds, once permission has been granted.</p>
<p>Question 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?</p>	<p>We have taken this question in two parts.</p> <p>First, in relation to whether the 50 per cent target should apply to all Green Belt areas (including previously developed land in the Green Belt), CPRE agrees.</p> <p>Second, in relation to whether the Government or local planning authorities should be able to set lower targets in low land value areas, CPRE disagrees. Targets should be prescriptive and act as a ‘minimum benchmark’ for affordable housing delivery, with subsidy being provided as necessary to provide the tenure and type of housing required where site viability is low. Affordable housing commitments at present are regularly reneged on post-planning due to ‘viability constraints.’ One particularly egregious example of this</p>

Chapter & Questions	CPRE response
	<p>was the negotiated reduction in affordable housing provision from 40% to 23% in the Gilston Garden Villages in Hertfordshire, before the planning decision notices had even been issued.</p> <p>We would like to see the government commit to a new definition of affordable housing, that takes account of average local incomes, rather than market demand. (See response to Question 15 above.)</p>
<p>Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?</p>	<p>Yes. CPRE also recommends that these requirements should also apply anywhere where areas of greenfield land are developed. All development (irrespective of whether on former GB land or not) should be required to deliver improvements to nature and public access.</p>
<p>Question 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?</p>	<p>No. It remains unclear how 50% affordable housing delivery on 'grey belt' sites will be achieved if Benchmark Land Value (BLV) still has to allow for an 'appropriate premium for landowners'. Who determines what 'appropriate' or 'proportionate is'?</p> <p>CPRE has campaigned for hope value to be removed and considers an independent assessment by a District Land Valuer to be a suitable mechanism for agreeing agricultural price for land value in the Green Belt. Residential consent vastly increases the value of land, but this is extracted at the point of sale. The 'betterment' ought to be more evenly shared than all of it going to the landowner, and speculator with no value left for affordable housing and other community infrastructure required for a sustainable development.</p> <p>As set in a response to an earlier question, any approach (once agreed) should be consistently adopted across Green Belt and non-Green Belt sites. Why should there be a specific requirement for Green Belt areas and not others?</p>
<p>Question 38: How and at what level should Government set benchmark land values?</p>	<p>CPRE has supported recent campaigns by Shelter and others for hope value to be removed altogether from the planning process, as calculations of it have served to effectively crowd out the provision of affordable housing. As per our response to question 37 above we consider an independent assessment by a District Land Valuer to be a suitable mechanism for agreeing agricultural price for land value.</p>



<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
<p>Question 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?</p>	<p>The 50% affordable housing requirement should be made mandatory and non-negotiable. Within the 50% requirement Local Plans must be able to set specific targets for social rented homes in line with genuinely assessed need.</p> <p>We have concerns that raising the Benchmark Land Value will lead to a reduction in the number of genuinely affordable homes delivered via viability discussions.</p>
<p>Question 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?</p>	<p>We strongly disagree with this proposal. Any land released from the Green Belt must be subject to the Golden Rules and local planning authorities should have the power to seek further contributions to affordable housing to meet local need if required.</p> <p>The revised NPPF must be tougher on developers so they cannot avoid affordable housing provision.</p>
<p>Question 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?</p>	<p>Yes. Late-stage assessments should be applicable, but independent assessments of viability should be ascertained and not those commissioned by the developer.</p>
<p>Question 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?</p>	<p>Yes. CPRE would prefer development to be plan-led, as we believe that as a result it is clearer that new development can best be planned to meet community needs. Where there is a positive planning balance in that positives (clearly in the Green Belt) outweigh harms, then the golden rules should apply. As with reneging on agreed contributions for affordable homes on residential applications, jobs claimed by developers to acquire consent should be evidenced as created. Too many large logistics shed in the Green Belt are consented on claimed jobs and gross value added, but don't always materialise, calling into question the outcomes of the planning system.</p>

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
<p>Question 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?</p>	<p>Yes. As with other NPPF revisions, once a local plan is at Regulation 19 Stage it should be examined based on the earlier draft of the NPPF. Otherwise further unnecessary delay will occur and the government’s objectives will be hindered not helped.</p>
<p>Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?</p>	<p>We agree that land value ought to be used, but further clarity around what 'proportionate' means is needed.</p> <p>We have seen land value being removed at an early stage, leaving no ability to deliver affordable homes and other needed infrastructure.</p>
<p>Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?</p>	<p>CPRE would support a more proactive role for Homes England, provided that it is directed through policy to prioritise regeneration schemes within urban areas, before land being released from the Green Belt.</p>
<p>Question 46: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>Whilst we understand the reasons for the proposed ‘grey belt’ policy, an urgent rethink is required. As currently proposed the policy is likely to lead to a flood of speculative planning applications in inappropriate locations such as strongly-performing Green Belt, Best and Most Versatile agricultural land, and highly-valued landscapes, outside of the proposed definition of ‘grey belt’, as well as leading to drawn-out legal challenges and appeals.</p> <p>Further clarity is required around transitional arrangements for local planning authorities that have already undertaken green belt reviews. We strongly support the suggestion that Green Belt boundaries should be set ‘...having regard to their intended permanence in the long term, so they can endure beyond the plan period.’ As mentioned elsewhere here, we think the proposed new paragraph 142 will need fundamental redrafting in order to uphold the principle of permanence.</p>
<p><b>Chapter 6 - Delivering affordable, well-designed homes and places</b></p>	
<p><b>Headline response:</b> We support the recognition and introduction of the need for new social rented homes in policy. This aligns with our recent research around the need for greater numbers of rural affordable housing, in particular, social rented homes. (CPRE, State of Rural Affordable Housing, November 2023)</p>	

Chapter & Questions	CPRE response
	<p>However, it is difficult to see, without minimum targets, how the aspiration to deliver greater numbers of social rented homes will be met.</p> <p>The 10% requirement on all sites should be expanded to include a mix of tenures, rather than being removed altogether. Without an impetus to provide a minimum number of affordable homes, developers will simply not provide them.</p> <p>We are also disappointed that the definition of affordable housing has not been updated. We recommend that government redefine the term ‘affordable housing’ so that people on average salaries in a local area pay no more than 33% of their salary on rent, as evidenced by the 2024 Housing Review. Where homes are not linked to average local incomes they should not be classed as affordable, as this obscures the type of housing that is being delivered.</p> <p>A seminar held by CPRE in September 2024, and attended by a cross-section of experts from the planning sector, also concluded that:</p> <ul style="list-style-type: none"> <li>• Existing commitments to provide affordable housing on sites with planning permission need to be secured. This should not be compromised by site viability considerations in the government’s understandable push to get already consented developments through.</li> <li>• Government should set national policy targets for numbers of new social housing (as opposed to overall housing or affordable housing). Demand for housing (particularly in acute areas of need like South East England) is so high that simply increasing the supply of houses (even by the numbers in the government ambition) will not materially change the value of housing to the degree needed to help those in the most acute housing need.</li> <li>• Government should provide policy support for allocating more sites specifically for social housing. This is borne out by the relatively greater effectiveness of policies in Scotland as well as the experience of local authorities and registered providers in England. ‘Planning passports’ could also be used to encourage the greater take up of ‘rural exception sites’, an established tool of developing sites specifically for affordable housing in rural areas.</li> </ul>
<p>Question 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?</p>	<p>Yes.</p> <p>CPRE agrees that local needs should be set out in a comprehensive housing needs assessments, particularly Social Rent as part of broader affordable housing policies. The need for new social rented housing is particularly urgent in rural areas. In 2023 CPRE research found that it will take 89 years to clear the rural social backlog of 306,700 people on the waiting list. From 2000 to 2022 waiting lists for rural social housing increased by 10.8%.</p> <p>Therefore, reform of the NPPF will need to ensure some levers to ensure developers do implement agreed contributions, as the current viability focus allows developers to easily renege on them. This is the real</p>

Chapter & Questions	CPRE response
	<p>cause of housing market dysfunction, as developers do as they please. In future housing developers need to be held to account.</p> <p>We support the recognition and introduction of the need for new social rented homes in policy. However, it is difficult to see, without minimum targets, how the aspiration to deliver greater numbers of social rented homes will be met. CPRE recommends that:</p> <ul style="list-style-type: none"> <li>• Government should set national policy targets for numbers of new social housing (as opposed to overall housing or affordable housing). Demand for housing (particularly in acute areas of need like South East England) is so high that simply increasing the supply of houses (even by the numbers in the government ambition) will not materially change the value of housing to the degree needed to help those in the most acute housing need.</li> <li>• Government should provide policy support for allocating more sites specifically for social housing. This is borne out by the relatively greater effectiveness of policies in Scotland as well as the experience of local authorities and registered providers in England. ‘Planning passports’ could also be used to encourage the greater take up of ‘rural exception sites’, an established tool of developing sites specifically for affordable housing in rural areas.</li> </ul>
<p>Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?</p>	<p>No.</p> <p>We believe that the target should remain as a baseline which local authorities can exceed, but crucially the new NPPF should include it alongside a target for social rent. The target for rented affordable housing should make up the majority of affordable housing provided and therefore be higher than the 10% affordable home ownership target, as is already the policy aspiration in London.</p>
<p>Question 49: Do you agree with removing the minimum 25% First Homes requirement?</p>	<p>Yes.</p>
<p>Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?</p>	<p>CPRE agrees First Homes are not necessarily affordable, even at the first point of sale, however we are supportive of the approach to encourage a mix of tenures and believe it should be left to local authorities to assess housing need in their area and necessitate a tenure mix in policy on this basis.</p>

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	<p>Yes.</p> <p>The policy proposed in draft NPPF69 is, however, insufficient in CPRE’s view, as it will rely on strong and specific local plan policies which are enforced through local decision making. In the current context of poorly resourced local planning, we expect that it will have little impact on the mix of tenures that are delivered in practice.</p> <p>CPRE recommends that, in line with the recommendations of the 2018 Independent Review of Build Out (the Letwin Review), that the government introduces a national development management policy (NDMP) on tenure mix in new developments which sets minimum expectations for proportions of social rent, accessible housing and affordable home ownership as a baseline which local authorities can exceed (but not fall below) based on the specific needs of their area.</p>
Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?	<p>As per our response to Q51, we believe that national planning policy (through the use of an NDMP in this case) needs to set minimum expectations that local authorities can exceed, but not fall below, where they can justify this on the basis of a housing market assessment and local viability conditions. There is an acute need for more rented and specifically social rented housing in all areas of England, and it is inadequate for areas to not be provided for where there is a weak land market. Where local economic conditions would make development with a high percentage of affordable or social rent unviable, targeted government support should be given in either the form of loans or a stake in the ownership of the site.</p>
Question 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?	<p>CPRE recognises that there are small sites where there is not the economy of scale to build an affordable unit, however a developer contribution commensurate to the scale of development could be required, similar to the way smaller developers will pay a sum for biodiversity net gain to the local authority to discharge the obligation/condition.</p>
Question 54: What measures should we consider to better support and increase rural affordable housing?	<p>Another issue that came to light in the 2018 Letwin Review was the lack of data held by government on the development pipeline of large development sites. A better understanding of this would enable government to target subsidies or additional funding to developments and areas where this was particularly needed.</p> <p>The NPPF should better facilitate the creation of small-scale rural exception sites (RES) for social rented housing in villages as the best way to provide social rented housing in villages. This could be done through use of the concept of the ‘planning passport’. To give one rural example, at present in Norfolk, insufficient</p>

Chapter & Questions	CPRE response
	<p>RESs are coming forward, resulting in a failure to deliver much-needed rural social rented affordable housing. This appears to be partly as Local Plans are increasingly allowing some market-housing to be built adjacent to settlement boundaries, likely leading to landowners holding on to land for such market housing, rather than for RESs at less profit. Also, there are indications that registered providers of affordable housing are struggling to provide new affordable units at the necessary and needed rates, due to a number of factors, not least the costs in maintaining existing properties. This leads us to believe that more needs to be done to enable LPAs to deliver social rented affordable housing.</p> <p>Likewise, the provision of social rented housing needs to be prioritised further, because the linking of affordable housing provision to the building of market housing has failed to provide (particularly rural) communities with genuinely affordable homes. Targets must not conflate ‘wants’ and ‘needs’. Net additions to the housing stock should meet genuine needs, including in relation to type, tenure, size, location and cost. They should be delivered in a range of ways, with greater priority given to making more effective use of the existing stock and the use of brownfield land and existing buildings. This should include taking opportunities for the subdivision of large properties and addressing the loss of the existing housing stock to second (or other non-primary) homes and holiday lets.</p> <p>Stronger support and incentives for community-led housing and for re-use of existing buildings/existing homes including subdivision where opportunities arise. Reclamation of the existing housing stock through addressing issues around second homes and holiday lets through licensing schemes, principal and local occupancy clauses. CPRE’s published research into the impact of holiday lettings on rural affordable housing supply in 2021 (<a href="#">New research: a huge rise in holiday lets is strangling rural communities - CPRE</a>). Our analysis of data from 2015-2021 on properties on Airbnb and similar sites found that 148,000 homes that could have otherwise – or in some cases, previously were – used as homes by local families were instead being put up on short-term and holiday lets. We supported the previous governments proposal to introduce a new planning use class for such properties and would like to see this government follow through.</p>
Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?	Yes.

Chapter & Questions	CPRE response
Question 56: Do you agree with these changes?	Yes.
Question 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?	<p>Yes. We recommend that amendments should also be made to the definitions of ‘discounted market sales housing’ and ‘Other affordable routes to home ownership’ within the overall policy definition of affordable housing.</p> <p>CPRE recommends that all references to ‘at least 20% below local market’ value or rents within the NPPF definition of affordable housing are removed and replaced with ‘a price that means people on average salaries in the local area are paying no more than 33% of their salary’ on housing costs as applicable.</p>
Question 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?	<p>Yes. CPRE would like to see small and medium enterprises in the construction sector better supported by the planning system. Small and Medium Enterprise or SME builders equal 12% market share in 2024, down from 40% in 1995. Yet SMEs routinely build out brownfield sites. Currently only 10 firms build more than 40% of the nation’s homes, which is a monopoly.</p> <p>Key to this should be (i) a standard method that allows local planning authorities to set well-evidenced and realistic housing targets, with specific expectations for a range of tenures, rather than the unrealistically high and at the same time unspecific (in terms of tenure) targets proposed in the draft new method. Unrealistically high targets will force local authorities to allocate more large sites rather than smaller sites; and (ii) greater powers to masterplan and control the development of large sites, as recommended by the Letwin Review, so that work can be parcelled out to smaller builders rather than monopolised by the larger builders.</p> <p>The current system of a call for sites from landowners can result in a significant under-reporting of potential sites. Rather than relying on the call for sites, properly resourced LPAs could determine the most sustainable sites and then consult the landowner about availability.</p>
Question 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?	No. The proposed change, in CPRE’s view, sends a signal (however unintended it might appear when reading the draft as a whole) that the government does not have the same focus on design quality as previously. As we showed in the joint housing design audit with UCL in 2020, most new developments can

Chapter & Questions	CPRE response
	<p>be objectively categorised as ‘mediocre’ or ‘poor’ with poor design quality being a particular issue in rural areas.</p> <p>We agree with concerns raised by some in the planning policy community that a policy reliance on ‘beauty’ is too subjective for use in planning policy, without a clear and measurable definition of what good design should be. CPRE recommends that (i) the reference to ‘beauty’ is retained but that the NPPF also makes clear that ‘beauty’ and ‘good design’ in relation to new housing are synonymous; and that (ii) the final NPPF sets clear indicators for good design with a pledge for progress against these indicators to be measured by both local planning authorities, developers and central government. Our housing audit highlights the critical indicators that should be used.</p>
<p>Question 60: Do you agree with proposed changes to policy for upwards extensions?</p>	<p>Yes. We particularly agree that there should not be a standard policy expectation for mansard roofs. This is because designing them into new developments serves to reduce the amount of roof space that can be used for solar panels.</p>
<p>Question 61: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>We would like to stress the following:</p> <ul style="list-style-type: none"> <li>• National Policy should redefine what is meant by ‘affordable housing’, so that discounted market housing and starter homes are removed from the definition, unless these categories are clearly linked to average local incomes and not just property prices.</li> <li>• Clear, unambiguous and binding targets should be set for affordable housing, particularly for social rented dwellings.</li> <li>• Greater government support is required to deliver affordable housing on rural exception sites, which would enable small scale affordable housing schemes to be built on the edge of rural settlements. This should include policy changes at national (and local level) to make it easier for such sites to come forward and to make it harder for other types of development in these locations to take place, in addition to the greater provision of grant funding for rural exception sites.</li> </ul> <p>Restrictions on the resale of affordable housing stock across rural parishes should be extended and enforced, so that these properties continue to be occupied by local residents, and not as second or holiday homes.</p>
<p><b>Chapter 7 - Building infrastructure to grow the economy</b></p>	



Chapter & Questions	CPRE response
	<p><b>Headline response:</b> CPRE understands that the government wants to adjust the planning system to increase housebuilding and grow the economy, but it is essential that – in doing so – it does not lose sight of the need to balance social and environmental aspects of sustainability with economic ones (set out in para. 8 of the NPPF) or of its climate change obligations. New developments, especially large ones, must be sited in sustainable locations i.e. that minimise the need to travel by private car and support sustainable last mile solutions for freight. The type identified (plus rail freight terminals) need to be considered at the strategic level, ie. above the level of individual local authorities. Regarding the proposal to move planning scrutiny about these large enterprises to the NSIP process. This is a concern as the public find this process very difficult to engage with. We also have concerns about the emphasis on freight and logistics because, apart from freight transport by rail, these are notoriously unsustainable operations. In addition, we maintain that there needs to be a requirement that employment sites are only allocated where there is a proven need and there should also be a requirement that, as part of the Local Plan process, all existing employment sites – particularly office blocks – are reviewed to determine which might be better re-designated for other purposes or whether parts of the sites could be re-designated.</p>
<p>Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?</p>	<p>No. CPRE believes that the NPPF has been deficient in this area since its introduction, and the proposed changes do not go far enough to encourage a more plan-led approach to commercial development. CPRE recommends that the final NPPF policies for economic development include undertakings to achieve other planning objectives, particularly re-use of brownfield land and vacant or derelict land or buildings, good links to public transport, zero carbon environmental performance and preventing unnecessary loss of greenfield land. Over-allocation of greenfield employment sites has long been an issue, and our belief is that plenty of brownfield land suitable for commercial development is potentially available, and has not been identified on brownfield land registers which are focused on land seen as only suitable for housing.</p> <p>In terms of NPPF86 b) CPRE is aware that some growth sectors such as logistics sheds at large scale cannot be located on most brownfield sites, and therefore guidance on how locations can be identified strategically according to a sustainability checklist to be located away from prime agricultural land, sites of ecological importance, near to public transport, or requirement to contribute to sustainable transport, and designs to incorporate best available renewable techniques such as rooftop solar installation should be required to comply with net zero ambitions.</p> <p>Likewise for NPPF87 clusters need strategic planning to avoid harms and optimise the delivery of public goods. Planning for more commercial development should take account of future trends. Warehousing is</p>

Chapter & Questions	CPRE response
	being configured for mechanisation and in future will offer much fewer employment opportunities, which will reduce the need for new highway capacity and car parking.
Question 63: Are there other sectors you think need particular support via these changes? What are they and why?	Not to our knowledge. Those listed at para 3 a-d of the consultation paper do not need 'particular support' in the planning system. It is unlikely that there are others which cannot be handled by normal planning applications on land already within the relevant use class.
Question 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?	<p>No. The Nationally Significant Infrastructure Project or NSIP regime does not function in a way which is open to public scrutiny and involvement if a site is unsuitable or damaging (see also our responses under Chapter 9), and it also relies on there being a clear and transparent policy framework for siting new developments through National Policy Statements. Commercial development should be plan-led.</p> <p>The definition of gigafactories is quite a generic word which would need to be clearly defined if it is to be directed into the NSIP regime.</p> <p>It should also be made clear that any special land classifications are upheld in planning terms especially areas of nature retention such as Sites of Special Scientific Interest or SSSIs, Special Protection Areas or SPAs.</p>
Question 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?	CPRE believes that datacentres and similar infrastructure proposals should be determined by local planning authorities, not by central government through the NSIP process.
Question 66: Do you have any other suggestions relating to the proposals in this chapter?	Yes, local communities must have a meaningful and substantive way of participating in the infrastructure planning process. See response to Chapter 9 below.
<b>Chapter 8 – Delivering Community Needs</b>	
<b>Headline response:</b> CPRE is prepared to support a 'A vision led approach' (to transport planning) provided this uses an accepted definition that aims towards modal shift away from cars and towards public transport and active travel. We also believe that there needs to be stronger consideration of highways issues in decision making on new development.	

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	Yes. CPRE supports the provision of public service infrastructure and supports the changes.
Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	Yes. CPRE agrees with the proposed changes to para 99 and has continuously called for adequate provision of public services and infrastructure to be integrated into all new developments from the outset.
Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?	<p>Yes. CPRE is supportive of a ‘vision led approach’ to development ensuring that access to sustainable transport modes is considered and provided from the outset. All Local Plans should support, and development proposals should facilitate the delivery of a modal shift, underpinned by targets set in the Local Transport Strategy for an increased proportion of trips to be made by public transport, walking or cycling/wheeling (within a clear timeframe).</p> <p>However, we would like to see the addition of the phrase “in tested scenarios” clarified (new NPPF115) including who tests the scenarios and under what conditions. We maintain that highways authorities (e.g. County Councils) should no longer continue to determine the “...unacceptable impact on highway safety...” by simply referring to past recorded deaths or serious accidents. Instead, the approach must be more preventative, rather than reactive.</p> <p>New developments should also make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that development supports delivery of financially viable and health-positive transport networks and supporting infrastructure. This includes ensuring new development is located such that residents, workers or visitors are not dependent on cars.</p> <p>CPRE supports the approach advocated in the Create Streets report ‘Stepping off the road to nowhere’ which resulted in a reduction in land take for a new development in Chippenham from 350 ha. to 120 ha. and better access to the station and nature.</p>

Chapter & Questions	CPRE response
<p>Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</p>	<p>Planning for health outcomes must be a strategic priority for plan-making and decision-taking. Public Health England’s report on the disparities in the risk and outcomes of Covid-19 confirmed that those who live in more deprived urban and rural areas are more susceptible to the effects of the disease. (UK gov, August 2020). In addition, it has been estimated that socio-economic and physical environments determine 60% of health outcomes (Department of Health and Social Care, 2019). Focusing on these determinants of health is essential for improving population health and well-being and reducing inequalities.</p> <p>All Local Plans should demonstrate a clear understanding of the determinants of poor health within the Plan area and seek to reduce health inequalities.</p> <p>The Health and Social Care Act (2012) gave local authorities new duties and responsibilities for health improvement and health protection. The Act requires every local authority to use all the levers at its disposal to improve health and well-being including as part of plan-making and development decisions. However, there is no reference in the NPPF currently, or proposed, to ‘health impacts’ or ‘health inequalities’, despite there being a wealth of research about the impact that the built environment has on health outcomes. Whilst reference is made in planning practice guidance to the use of health impact assessments as a ‘useful ‘tool’, there should be explicit reference to the need for authorities to assess major applications against agreed criteria. According to ‘the developer live’, only 38% of Local Plans in England has a planning policy relating to health impact assessments (as of February 2023 - <a href="https://www.thedeveloperlive.co.uk">The Developer - Opinion - Just 38% of Local Plans require Health Impact Assessments: They all should (thedeveloperlive.co.uk)</a>). National policy should set an example and assist already over-stretched local planning authorities in understanding how to measure health impacts of a development on its potential future users and surrounding communities.</p> <p>Walking and cycling infrastructure are a basic requirement for all development to support healthier lifestyles and lower carbon travel in the future.</p> <p>National planning policy should be more prescriptive about the need to embed active travel in the design of new developments from the outset. Strong presumption in favour should be given to developments that do this. The identification and protection of tranquil areas (current NPPF191) should continue to be encouraged by national planning policy as a means of increasing access to peaceful environments.</p>

Chapter & Questions	CPRE response
<p>Question 71: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>Yes. Strong support must be given to promoting public transport use (particularly use and increase in the number of buses in rural areas) and modal shift in planning policy. When considering a hierarchy of sustainable transport, electric/renewable-powered water transport should come high in any such list.</p> <p>CPRE recommends that the wording in new NPPF107 should be revised to read as follows, <i>“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and only generating new trips by public transport, walking or cycling (save for disabled driver trips).”</i></p> <p>We would like to see emphasis placed within the NPPF on the need for providing disabled (or less-abled) friendly public transport. Provision or contributions made towards provision should be a planning requirement for all new major developments. We would like to see this change introduced as a new bullet point in NPPF108 (‘old paragraph 110).</p> <p>Transport research demonstrates clearly that availability of parking is a major factor in whether people drive or use alternatives, and this should be reflected in planning policy. For example, a pilot scheme launched by Sustrans in 2022 called ‘going car free’ followed 10 people who gave up car travel for 3 weeks. The study found a ‘huge shift to cycling and public transport’ use as a result. (<a href="https://www.sustrans.org.uk/going-car-free">Going Car Free: Exploring the barriers and benefits - Sustrans.org.uk</a>)</p> <p>Car-free development should be the starting point for all new developments on the basis that they should be well-connected by public transport, supported with walking and cycling infrastructure and close to public amenities and services. Development may include limited parking space for car clubs (these should be Electric Vehicles with appropriate charging facilities) however these should not discourage use of other sustainable transport modes. Car-free development has no general parking but must provide adequate disabled persons parking close to building entrances. CPRE recommends that there should be no minimum parking standards in planning policy, and the NPPF should set a guideline maximum which should not be exceeded.</p> <p>The NPPF also states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road</p>

Chapter & Questions	CPRE response
	<p>network would be severe. CPRE has seen numerous examples of the problems this policy has caused in terms of unsatisfactory links between new developments and existing highways. We recommend that there should be a stronger expectation that developments should meet the tests in NPPF116 (draft new NPPF114), with refusal allowed where there is reasonable doubt. The only way of testing cumulative impacts is through a traffic modelling process, but this has severe limitations. If the deputy prime minister’s comment reflects the views of the MHCLG, we would argue that there is an urgent need for the traffic models used by government and by local highway authorities to be overhauled.</p>
<b>Chapter 9 - Supporting green energy and the environment</b>	
<p><b>Headline Response:</b></p> <p>We believe that the government’s target for tripling solar energy generation can be met through a rooftop first approach, and 2023 research for CPRE by University College London demonstrated that there is more than sufficient rooftop capacity available to meet most of the national target of 70GW by 2035. This should be delivered through requiring solar as standard on all new industrial and office buildings, as well as on new houses where possible alongside or substituted by equivalent renewable generation and PassivHaus standards.</p> <p>Greenfield solar developments should become much more exceptional and time-limited than the current 40-year permissions typically given at present, and require provisions for multi-functional benefits and achieving best practice standards for landscape and natural capital.</p> <p>Large-scale solar farm applications should be actively prevented where they would compromise active, viable and sustainable farm businesses and where they would lead to the eviction of tenants. Such a policy would be clearly in line with a statement Sir Keir Starmer made in February 2023, in particular: ‘Tenant farmers need a fair deal. They need to know their futures are secure. Look, I want to see more solar farms across the countryside! ... But we can’t do it by taking advantage of tenant farmers, farmers producing good British food on carefully maintained, fertile land. They can’t plan properly if the soil beneath their feet isn’t secure. It’s a huge barrier to planning sustainable food production, so we’ve got to give them a fair deal, and we’ve got to use our land well.’</p> <p>In addition, it is now critical to cut transport climate emissions. In the first half of the Net Zero period between 1990-2050 there was no road transport decarbonisation whatsoever. Road transport emissions in 1990 were 110.8 MtCO<sub>2</sub>e and in 2019 111.4MtCO<sub>2</sub>e, and post-covid are bouncing back. There is a ‘policy gap’ of around 120MtCO<sub>2</sub>e over the fifth Carbon Budget period 2028-32, which the government needs to close through a reduction in traffic of around 20% by 2030, in parallel with a strong EV transition. The planning system should support the transition to a low carbon future in a changing climate by reducing the need to travel for everyday needs and activities. It should help to shape places in ways that contribute to radical reductions in greenhouse gas</p>	

Chapter & Questions	CPRE response
	<p>emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infra-structure.</p> <p>We also believe that the final NPPF should be consistent with, and make strong links to, the Land Use Framework promised by Defra. While planning can currently only directly affect land use for activities within the definition of development, it has a profound influence on the amount of land available for other uses such as farming, forestry, nature recovery and climate mitigation and adaptation. A seminar held by CPRE in September 2024, and attended by a cross-section of experts from the planning sector, concluded that:</p> <ul style="list-style-type: none"> <li>• An acceptable framework for what is meant by ‘sustainable development’ is needed. Given the limited amount of land available to the country, the planning framework should prioritise sustainable development.</li> <li>• A single land use dataset should be developed that enables a consistent and cross-governmental view, and which should be enabled by a common set of standards. Land use across the UK is challenging to track and map, making attempts to balance usage across different planning authorities even more difficult and expensive.</li> <li>• Any land use framework needs to be underpinned by re-use and sustainability, focusing on getting the most outcomes for the fewest interventions over time. Local plans and local nature recovery strategies should also be mutually reinforcing, with each informing the other.</li> </ul>
<p>Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?</p>	<p>Yes, provided (i) our current concerns set out below are addressed and (ii) the threshold is set above 100 MW so that most schemes continue to go through the local planning system. We believe that the climate emergency is the greatest threat facing the countryside and we support greater renewable energy deployment alongside energy efficiency measures to achieve the UK’s net zero target. We believe it is better to focus on community-level schemes which will have more direct benefits for the public, compared to larger schemes which on recent evidence will largely benefit big corporations. We have major concerns about proposals to reintegrate onshore wind farms within the nationally significant infrastructure project (NSIP) process, due to the difficulties that currently exist with public engagement in this process, and the current lack of a strategic plan for energy setting out how much is needed and where. CPRE recommends that the promised Strategic Spatial Energy Plan is consulted on, subject to Strategic Environmental Assessment (SEA) and brought into force as soon as possible.</p> <p>In June 2024 we published a joint report with the Aldersgate Group and the industry body Renewable UK. The research highlighted wider problems with a lack of strategic planning for energy infrastructure, a need for joined-up policy, and improved public engagement. These challenges are compounded by a lack of resources across the system and difficulties around access to data. We do not agree with speeding up the</p>

Chapter & Questions	CPRE response
	<p>system for individual projects until it has been clearly discussed and agreed as to what wider plan or programme they are contributing towards. Large wind turbines can have major impacts on landscape quality and tranquillity and strategic planning is essential so that such impacts can preferably be avoided as far as possible.</p>
<p>Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?</p>	<p>No. We agree that support should be given to renewable energy generation schemes, however, the changes proposed do not sufficiently differentiate between technologies, and landscape impacts can vary considerably between them. Also, other methods for reducing energy consumption and demand should also be considered and provided weight in planning policy. For example, energy efficient construction, locating development close to public transport and promoting car-free development.</p> <p>CPRE recommends that the following text should be retained in the NPPF – ‘161. Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.’ We disagree with the proposed removal of the existing NPPF161; all reference to and support in planning policy for community led energy production should be retained. In particular, focusing on community led microgeneration schemes would enable an increase in onshore wind deployment as the government intends, but with more local community benefit, minimal impact on the landscape, and without the visual intrusion and loss of tranquillity over large areas of countryside caused by large scale onshore wind schemes.</p> <p>We support the proposal at new NPPF161 to require local plans to identify suitable areas for renewable and low carbon energy rather than just asking them to ‘consider’ doing so. However, the wording should make clear that any such areas identified should be identified with specific reference to the type of renewable energy they are suitable for i.e. an area would be identified as being suitable for wind, not just as being suitable for renewable energy, as the impacts and considerations are very different for different types. To be effective as a requirement, the words “where this would help secure their development” should also be deleted from 161b to ensure that this is not used as a loophole to avoid identifying such areas.</p> <p>Whilst the removal of footnote 59 removes text that reinforced the idea that repowering and extension of life wind farm developments could be lumped together, recognition of the difference between ‘repowering’ (replacing existing wind turbines with usually larger, newer, more efficient turbines) and ‘extension of life’ (keeping the same turbines but replacing parts) would be a worthwhile addition, perhaps to the glossary.</p>



Chapter & Questions	CPRE response
	<p>This is because the difference in impacts can be significant due to the much larger size of new turbines when existing turbines are replaced in a repowering scheme, but also because a misunderstanding/lack of recognition of the difference has resulted in poor decisions.</p> <p>CPRE recommends that large-scale solar farm applications should be actively prevented where they would compromise active, viable and sustainable farm businesses and where they would lead to the eviction of tenants. Such a policy would be clearly in line with a statement Sir Keir Starmer made in February 2023, in particular: ‘Tenant farmers need a fair deal. They need to know their futures are secure. Look, I want to see more solar farms across the countryside! ... But we can’t do it by taking advantage of tenant farmers, farmers producing good British food on carefully maintained, fertile land. They can’t plan properly if the soil beneath their feet isn’t secure. It’s a huge barrier to planning sustainable food production, so we’ve got to give them a fair deal, and we’ve got to use our land well.’</p> <p>We would also recommend a clearer definition of both ‘community-led energy’ and ‘community energy’ in the glossary.</p>
<p>Question 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?</p>	<p>Yes. Although the text of this section of the consultation says “While these changes seek to promote the delivery of renewable energy schemes, proposals would still be subject to the policy requirements set out in the framework alongside other environmental safeguards”, the NPPF does need to spell out what this means in practice, for example on SSSIs.</p> <p>Peat is an irreplaceable habitat. Natural England has standing advice for prohibiting peat development. CPRE agrees peat should not be developed and should be afforded greater weight in national planning policy. The reference to peat is important and is also relevant, in the case of lowland peat, to agriculture.</p> <p>We also recommend that the promised land use framework includes clear policies for protecting farmland and habitats, that should have effect in policies and decisions on farming and forestry as well as planning. In particular, there is a strong argument for 're-wetting' peat in lowland situations where conventional farming practices are leading to permanent loss of the soil resource itself. However, lowland peat soils contribute substantially to field scale vegetable production and usually will meet criteria for grade 2, sometimes grade 1, in the Agricultural Land Classification (ALC), where the water table is suitably controlled for that purpose. Re-wetting to preserve the remaining peat and its carbon storage and potential nature</p>

Chapter & Questions	CPRE response
	<p>recovery roles would adversely affect its potential productive capacity for food production. It would also justify appropriate compensation mechanisms to cover significant income foregone. And it reinforces the argument for minimising the loss of high grade agricultural land to development through the planning system.</p>
<p>Question 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?</p>	<p>Yes, if this means local planning authorities can determine wind projects up to 100 MW. Due to their direct and significant impact on local communities, it's important that local planning authorities have this authority.</p> <p>Our support is however conditional on there being a strategic spatial energy plan (SSEP) in place (see also response to question 72). The kind of developer-led approach we saw in the late 2000s, where many schemes were permitted on appeal against the wishes of local authorities, would cause major problems and lead to widespread resentment in many rural areas. A more strategic approach would help move the arguments on from 'whether' we should have wind power, to 'where' it should go.</p>
<p>Question 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?</p>	<p>Yes, if this means local planning authorities can determine solar projects up to 150 MW. Due to their direct and significant impact on local communities, it's important that local planning authorities have this authority.</p> <p>In CPRE's experience, solar farm proposals are more accessible to communities to engage with when determined under the usual and familiar planning regime rather than the complex NSIP regime.</p> <p>Our support is however conditional on there being a strategic spatial energy plan (SSEP) in place (see also response to question 72). Continuing with the kind of developer-led approach we are currently seeing, where many schemes are permitted on appeal against the wishes of local authorities, is causing major problems and is leading to widespread resentment in many rural areas. A more strategic approach would help move the arguments on from 'whether' we should have more solar power, to 'where' it should go.</p>

Chapter & Questions	CPRE response
Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?	No comment.
Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?	<p>CPRE recommends that:</p> <ul style="list-style-type: none"> <li>• all planning applications for major development should be accompanied by an assessment of the carbon lifecycle of the project considering construction and operational stage, with a per annum carbon figure so decision takers can understand the carbon impact – particularly embodied carbon - of development proposals.</li> <li>• Guidance on delivering energy efficient homes and other buildings should be set out at a national level and enable local innovation and improvements on Building Regulations, which should be seen as the minimum baseline rather than the highest standard to be achieved. Recent research shows significant economic benefits for domestic installations, for example when PV is combined with heat pumps: in Germany, Spain and Italy, households which combined solar PV and a heat pump saved at least 60% off their annual bills and most of these savings are expected to be maintained into the future.</li> <li>• All local plans should have policies with prescriptive rules on recycling land or adopting a ‘brownfield first’ approach, with an expectation of minimum residential densities of 30-50 dwellings per hectare (and significantly higher still in many urban areas, depending on built form), along with locating development close to public transport, reducing car dependency, and reducing carbon emissions across the Plan area. As part of this, brownfield land registers should also include an indicative capacity for rooftop solar generation on suitable sites and buildings, complementing the existing analysis of capacity for new housing. The Cool Climate Network at the University of California, Berkeley, has shown over many years of research that the single most effective way to lower carbon emissions through spatial planning and development pattern is via urban densification.</li> <li>• All adaptation measures proposed should take account of future modelling scenarios as well as past and present data.</li> </ul>

Chapter & Questions	CPRE response
	<ul style="list-style-type: none"> <li>• The NPPF should draw connections between transport and climate change and between transport planning and spatial planning. The Land Use Framework (and/or a national transport strategy) similarly needs to consider land-use and transport together. According to government statistics released in February this year, greenhouse gas emissions (GHGs) from domestic transport make up 28% of all greenhouse gas emissions and if aviation and shipping are taken into account, the transport sector is responsible for nearly a third of all GHGs. Consequently, all policies should be demanding that new transport projects are at least carbon neutral. Transport provision, or lack of, is a major factor which influences land-use. That explains why there is a strong demand to locate development next to motorway junctions, and why many junctions are already congested, with more development in the pipeline. There is no prospect that such congestion could be mitigated by increasing the capacity of the roads or junctions as that would be counter-productive and undesirable on several fronts. It would encourage car dependency and increase traffic bringing congestion, noise and air pollution, increased climate emissions and collisions, and further loss of patronage to public transport. It is vital that most development is located in places which offer a genuine choice of travel and that all developments are designed to minimise traffic generation.</li> <li>• NPPF160 / 162 should be rewritten in the light of the Finch court case - <a href="https://www.supremecourt.uk/cases/uksc-2022-0064.html">https://www.supremecourt.uk/cases/uksc-2022-0064.html</a> - to make explicit that downstream carbon emissions resulting from projects that will lead to significant emissions should be considered as a material planning consideration.</li> <li>• NPPF221-223 should be rewritten to rule out fossil fuel exploration and extraction on new or expanded sites, other than in relation to restoration of already existing sites.</li> <li>• In line with the CCC's recommendation, airport expansion (whether through 'making best use of existing' or 'new runways') should be ruled out.</li> </ul>
Question 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	The level of carbon emitted from new development across the country is not well understood. CPRE would like to see best available techniques incorporated in new developments to understand the long-term impacts on the climate.

Chapter & Questions	CPRE response
<p>decisions, and what are the challenges to increasing its use?</p>	<p>There is a legal requirement to demonstrate that development plans contribute to the mitigation of climate change. CPRE research in 2022 found that in practice this is considered insufficiently, and often not at all, during plan preparation and examination.</p> <p>National Policy should introduce a standardised approach to carbon counting for local plans. It is a legal requirement for all local authorities and the government to meet the carbon budget and this must be considered when proposing any policies relating to land-use and built development. All local plans must be prepared and adopted in line with the 6<sup>th</sup> carbon budget, and therefore, any updates to national policy should also align with this requirement.</p>
<p>Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?</p>	<p>Yes. CPRE recommends that:</p> <ul style="list-style-type: none"> <li>• All development should have a flood risk assessment, which assesses surface water drainage and run-off as well as risk of flooding from fluvial sources. The flood risk assessment (FRA) should consider the development site in the context of relevant local drainage in the wider area and how this might be impacted. The FRA should also consider if and how sewerage might be impacted. The FRA must include flood risk forecasts that incorporate the impact of climate change (in this context, discussions with the EA's flood risk advisor at Worthing recently indicated that 100 year future forecasts should be used in the consideration of development).</li> <li>• Reference to sustainable drainage systems (SuDS) is weak and should be strengthened. SuDS should not be a last resort to make a development acceptable but should be incorporated into the design from the outset as a key component. Flood risk from surface water should be given the same weight as flood risk from other sources, therefore, all developments should demonstrate how they are reducing risk of flooding, not just those in areas of 'risk'.</li> <li>• The NPPF advises that developers and local planning authorities consider how to minimize sources of increased flood risk. This includes vast areas of roads, roofs and hard paving which increase run-off rates. Revenue cuts have reduced maintenance of measures designed to reduce flooding risk.</li> <li>• There should be a firm focus on/priority for upstream measures and natural flood management (NFM), which should be encouraged through the Land Use Framework (in terms of influencing agricultural and forestry land use) as well as the NPPF. Heavily engineered / hard options should be</li> </ul>

Chapter & Questions	CPRE response
	<p>a last resort, only used when NFM and upstream measures have been maximised. These measures tick many other social, economic and environmental boxes. A recent example is Kendal, Cumbria where hard, downstream measures were prioritised and delivered first with upstream NFM measures being promised to come later. Apart from this being approached in the wrong order, the NFM/upstream phases never materialised, leaving some properties at greater risk of flooding according to the Environment Agency’s own planning application for the downstream proposals.</p>
<p>Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?</p>	<p>There is an urgent need for addressing climate change to be made a priority throughout all planning processes and there is a clear consensus in the sector as to what actions are effective, but the NPPF is significantly deficient in expecting these actions to be taken consistently. The recommendations we make in this chapter should be urgently acted upon.</p>
<p>Question 82: Do you agree with removal of this text from the footnote?</p>	<p>No. We strongly disagree with the proposed deletion of the footnote relating to agricultural land used for food production. We welcome the statement in the consultation text that ‘food security is important for our national security, and that safeguarding Best and Most Versatile agricultural land is an important consideration.’ Indeed, land in grades 1, 2 and 3a are central to production of consistent yields of crops at field scale with grades 1 and 2 essential to field scale vegetable production. Yet, the importance of sustaining food production as a fundamental aspect of sustainable development is currently not well reflected in the NPPF. In fact, policy to protect BMV land has been consistently weakened over decades since PPG7. Other than text on BMV only paragraph 124 significantly mentions food production and then only as one of many functions of undeveloped land.</p> <p>The proposed deletion of text from the footnote will in CPRE’s view be seized upon by those promoting schemes on BMV land, particularly those which have previously been refused where failure to comply with local BMV policies has been cited.</p> <p>The NPPF needs a stronger policy on saving high grade agricultural land for future food security (see our recommendation under Q83 below) in a context of global and domestic impacts of climate change on food supply. CPRE research has shown that two fifths of grade 1 land and nearly half of all grades 1 and 2 land is at the highest risk of flooding (zone 3) in England CPRE <a href="#">Building on our Food Security</a>. Defra research also shows that under medium to high emissions scenarios the 38% area of land designated as BMV could fall</p>

Chapter & Questions	CPRE response
	<p>due to drought from over 38% to 9.2-11.4% only. Keay and others, 'The impact of climate change on the suitability of soils for agriculture as defined by the Agricultural Land Classification - SP1104' (2014), <a href="http://sciencesearch.defra.gov.uk/Document.aspx?Document=13364_SP1104Finalreport.pdf">http://sciencesearch.defra.gov.uk/Document.aspx?Document=13364_SP1104Finalreport.pdf</a></p> <p>The government's 60% target for solar on farmland requires approx. 180,000 hectares (equal to approx. 3,060,000 tonnes of food) a year. Rather than losing high quality farmland to solar farms it would make sense to harvest solar energy on every new home built. SMEs routinely install net zero technology. Smaller PV is more efficient as energy is used at source and doesn't have to travel.</p> <p>CPRE Building on our food security, 2022 evidenced that since 2010 the nation has permanently lost 14,500 hectares of its best agricultural land to development (housing, commercial, energy etc), which could grow at least 250,000 tonnes of vegetables a year. As more flooding is forecast due to the climate emergency, our food security is threatened, and we ought to plan energy development in the most sustainable way.</p>
<p>Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?</p>	<p>CPRE recommends that current stocks of Best and Most Versatile (BMV) land should be considered an irreplaceable asset and prohibited from development other than in exceptional circumstances. Protection should also be strengthened for lower grade land, with a principle of the higher the ALC grade the greater the case against losing it. Lower grade land will have importance for one or both of cropping potential or pasture including dairying, in areas of the country where BMV land may be very limited or absent.</p> <p>It should be noted that Grades 1 and 2 of Best and Most Versatile land are already limited to, respectively, 2-3% and 17-18% of all farmland (<a href="http://publications.naturalengland.org.uk/category/5208993007403008">http://publications.naturalengland.org.uk/category/5208993007403008</a> )</p> <p>Extensive areas of grade 1 and 2 farmland are organic deep peat soils farmed intensively for food. Huge carbon losses to the atmosphere from this production make it unsustainable on grounds of soil degradation and ongoing greenhouse gas emissions. Rewetting of such soils to protect them and their carbon stores is required but will further reduce BMV land available for food production. As such, NPPF policy should reflect this while policy to protect all BMV land should be strengthened to reflect ongoing and future risks to food production. The footnote referenced in Q82, while imperfect, reflects this need to better recognise lower grade land in localised areas.</p>

Chapter & Questions	CPRE response
<p>Question 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?</p>	<p>Yes. We believe there is no proper overview of water resource and distribution management in the UK. This deficiency is reflected across all planning policy and practice.</p> <p>CPRE recommends that:</p> <ul style="list-style-type: none"> <li>• Water supply and wastewater disposal must be adequate before development is allowed to commence or be occupied. LPAs should be actively encouraged to use pre-commencement conditions to ensure that this is the case. The latter is the subject of the CPRE Sussex campaign for sewerage before development.</li> <li>• Strategic 25 years water supply and wastewater disposal plans should be produced by LPAs and water companies on a sub-regional basis, updated every 5 years.</li> <li>• There is a requirement in the NPPF that developers demonstrate that adequate waste water treatment infrastructure will exist to serve the development, before permission is granted.</li> <li>• Both the NPPF and the Land Use Framework should encourage large scale designation of (i) land (green space) for large-scale wetlands to filter road run-off; (ii) upstream river catchments upstream with appropriate vegetation to slow water run-off; and (iii) 'grey space' (currently used for roads and parking) for a range of uses relating to active / sustainable travel and green infrastructure – but most notably rain gardens (i.e. on-street SUDS). For example, Thames Water has said we need a staggering 357,000 rain gardens to tackle pollution and flooding in London.</li> </ul> <p>Water infrastructure must primarily be concerned with the quality and quantity of water in the national resource. Then with its efficient, sustainable and safe distribution, use and return to the environment. Infrastructure investment, nature-based solutions, land management and customer behaviour all have a role to play in achieving these objectives. Waste water infrastructure is also important for new development to ensure flooding is avoided.</p>
<p>Question 85: Are there other areas of the water infrastructure provisions that could be</p>	<p>CPRE recommends that all new homes should be expected to incorporate water saving measures, and not just in 'water stressed areas' as per current Building Regulations. Local CPRE groups have reported seeing more and more proposals where new houses have multiple bathrooms, often far more than there are</p>



Chapter & Questions	CPRE response
improved? If so, can you explain what those are, including your proposed changes?	<p>bedrooms. Efficient water use is vital and building with unnecessary /excessive numbers of bathrooms increases building footprint and therefore carbon footprint, as well as water use, particularly as every toilet cistern sits full of clean, treated water.</p> <p>Local water availability, quality and capacity of sewage systems must be a material planning consideration for new developments. It should not be left to the commercial water companies merely to advise as now.</p> <p>Additional to strategic sub-regional planning, water companies should be statutory consultees for all significant development proposals (say, &gt;10 dwellings).</p>
Question 86: Do you have any other suggestions relating to the proposals in this chapter?	CPRE recommends that either the NPPF or planning legislation should strengthen requirements for biodiversity net gain so as to afford better protection for endangered (red list) species. As it stands, a developer can gain permission and achieve 10% BNG by planting a few trees while at the same time decimating prime habitats for ground-nesting birds such as skylarks which have suffered enormous population declines in the UK in recent years.
<b>Chapter 10 - Changes to local plan intervention criteria</b>	
<b>Headline response</b> - CPRE's preference is that local planning functions are retained by local authorities. Government intervention should seek to address any delaying behaviour by landowners and developers, for example in relation to the pursuit of unsuitable site allocations or development types, as well as any issues within local planning authorities. A more collegiate and consensus led approach should be encouraged, with an expectation on developers to deliver approved allocations in a timely manner.	
Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?	<p>Yes. The new criteria should be stated in the NPPF so that they are easy to find.</p> <p>CPRE's preference is that local planning functions are retained by local authorities. Government intervention should seek to address any delaying behaviour by landowners and developers, for example in relation to the pursuit of unsuitable site allocations or development types, as well as any issues within local planning authorities. A more collegiate and consensus led approach should be encouraged, with an expectation on developers to deliver approved allocations in a timely manner.</p>
Question 88: Alternatively, would you support us withdrawing the criteria and relying on the	No. It is better that where intervention is needed, it is explained in policy which usually allows for more clarity than the wording of legislation alone can provide.

Chapter & Questions	CPRE response
existing legal tests to underpin future use of intervention powers?	
<b>Chapter 11 - Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects</b>	
<b>Headline response</b> - CPRE has no detailed response to questions 90-102. We would support increasing householder application fees in general terms, provided that any increased fee income is ringfenced for the planning functions of the local authority alone.	
Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?	Yes. This is on the proviso that any increased fee income is ringfenced for the planning functions of the local authority alone. As we believe in a plan-led system, we would particularly favour that the income is used for local plan evidence preparation and consultation.
Question 90: If no, 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. If Yes, please explain in the text box what you consider an appropriate fee increase would be.	
Question 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? Yes No – it should be higher than £528 No – it should be lower than £528 No - there should be no fee increase Don't know	

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.	
Question 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.	
Question 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.	
Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee? Please give your reasons in the text box below.	
Question 95: What would be your preferred model for localisation of planning fees? Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee. Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally. Neither Don't Know Please give your reasons in the text box below.	
Question 96: Do you consider that planning fees should be increased, beyond cost	

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
<p>recovery, for planning applications services, to fund wider planning services? 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?</p>	
<p>Question 97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?</p>	
<p>Question 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?</p>	
<p>Question 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.</p>	
<p>Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?</p>	
<p>Question 101: Please provide any further information on the impacts of full or partial</p>	

Chapter & Questions	CPRE response
<p>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.</p>	
<p>Question 102: Do you have any other suggestions relating to the proposals in this chapter?</p>	
<p><b>Chapter 12 – The Future of planning policy and plan making</b></p>	
<p><b>Headline response</b> - Regardless of where local authority planning departments are up to with their Local Plans, all would be required to take on a huge extra workload, which it may not be possible to fund from increased planning application fees, thus depriving other departments and services (such as sustainable transport) of funding. In any event, there is a national shortage of planners. If governments continue to emphasise speed in decision-making as has been the case since the late 1970s, planning departments are likely to make poor decisions which, amongst other things, could result in yet more poorly designed, car-dependent housing estates being approved.</p>	
<p>103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?</p>	<p>Yes.</p> <p>LPA's spend a lot of resource when progressing each stage of local plan making and therefore a new revision of the NPPF should take effect a month after publication, but where Local Plans are at Regulation 19 stage or more, they ought to be read against the NPPF December 2023.</p> <p>CPRE has particular concerns as to whether all local planning authorities will receive sufficient targeted support from government to carry out the speeded-up delivery required of them. Paragraph 3 of the consultation document only goes so far as to say: "This might include targeted support for those required to rework plans at pace". Both the proposed transitional arrangements, as well as the increased housing targets resulting from the proposed new standard method, would be very costly for all local planning authorities, nearly all of which are struggling, following a long period of austerity. Whether local planning authorities are currently at a late stage of Local Plan preparation or not, all would be involved in significant extra work. There is a real danger that funding will be switched from other important but non-statutory services such as sustainable transport.</p>

Chapter & Questions	CPRE response
	We are concerned about the status of the new Standard Method targets in locations where the current plan is out of date, in the period prior to a new plan being adopted. CPRE recommends that government allows for flexibility in the interpretation of proposed new NPPF76 to cover cases where a local planning authority has made substantial progress in adopting a plan with strategic policies that broadly reflect the NPPF.
104: Do you agree with the proposed transitional arrangements?	Yes
105: Do you have any other suggestions relating to the proposals in this chapter?	Yes. CPRE recommends that government brings forward changes to introduce effective strategic planning across England as soon as possible. Effective planning in our view should critically include full public involvement at all stages, transparency as to evidence base and policy development, full Strategic Environmental Assessment with consideration of meaningful spatial options, and a holistic approach to land use encompassing policies around agricultural and forestry uses as well as development within the planning system. We previously supported regional planning on the basis that resources and advice was used to support it at the sub-regional level of city regions and counties. We are of the view that city regions and counties are the most effective and democratic level at which to plan.
<b>Chapter 13 - Public sector equality duty</b>	
<b>Headline response</b> - Respondents have not been supplied with an Equalities Impact Assessment to understand the implications of the proposed changes to national planning policy. If one has been undertaken it would be in the public interest for the government to publish it alongside the revised draft. If one has not been undertaken it is difficult to see how policies can be implemented as the implications have not been fully understood.	
Question 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	Yes.  Respondents have not been supplied with an Equalities Impact Assessment to understand the implications of the proposed changes to national planning policy. If one has been undertaken it would be in the public interest for the government to publish it alongside the revised draft. If one has not been undertaken it is difficult to see how policies can be implemented as the implications have not been fully understood.

<b>Chapter &amp; Questions</b>	<b>CPRE response</b>
could be done to mitigate any impact identified?	