

<b>Report on the Draft National Planning Policy Framework (NPPF)</b>		<b>Agenda No: 6</b>
<b>Corporate Priority:</b>	Environment is clean and green, business is encouraged and local economy prospers, housing and transport meet local needs	
<b>Report presented by:</b>	Eleanor Dash	
<b>Report prepared by:</b>	Eleanor Dash	
<b>Background Papers: Draft National Planning Policy Framework and Consultation Questions</b>		<b>Public Report</b>
<b>Advice produced by Planning Inspectorate for Inspectors on Draft National Planning Policy Framework</b>		<b>Yes</b>
<b>Options:</b>	<b>Key Decision:</b>	<b>No</b>
<ul style="list-style-type: none"> <li>• To note the changes in policy guidance in the Draft National Planning Policy Framework.</li> <li>• To approve recommended responses to the consultation on the Draft NPPF.</li> <li>• To amend recommended responses to the consultation on the Draft NPPF.</li> <li>• Not to respond to the consultation on the Draft NPPF.</li> </ul>		
<b>Executive Summary:</b>		
<p>The Government is consulting on the Draft National Planning Policy Guidance, which will replace most existing planning policy guidance with a much smaller document. It contains some new guidance including that on neighbourhood plans and orders, a presumption in favour of sustainable development and a requirement to grant permission where a plan is absent, silent, indeterminate or where relevant policies are out of date.</p>		
<b>Decision: To approve the responses to the consultation on the Draft National Planning Policy Framework set out in this report.</b>		
<b>Purpose of Decision: To give this Council's views to the Government on the Draft National Planning Policy Framework.</b>		
<b>Corporate implications [should be explained in detail]</b>		
<b>Financial:</b>	Relating to s106 and CIL finance	
<b>Legal:</b>	Planning guidance will be used as basis for plan making and development management decisions	
<b>Equalities/Diversity</b>	As set out in the guidance	
<b>Customer Impact:</b>	As set out in the guidance	

<b>Environment and Climate Change:</b>	Policies are contained in the guidance
<b>Consultation/Community Engagement:</b>	Current consultation on the draft
<b>Risks:</b>	n/a
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## 1. Introduction

1.1 This report sets out the purpose of the Government in producing the Draft National Policy Framework (NPPF). It then summarises the contents of the document, mainly concentrating on the new policy guidance that it contains, which is identified by bold lettering. Officer comments on the draft policy guidance are identified by italics.

1.2 The Government has also issued specific consultation questions on the NPPF, which are set out in the report, together with recommended responses.

## 2. Background

2.1 The draft National Planning Policy Framework was published for consultation on 25th July 2011, with the consultation period until 17th October 2011.

2.2 The Government is committed to replacing the current national planning policy, set out in Planning Policy Guidance and Statements and some Circulars (of more than 1,000 pages), into one clear tightly focused document, of around 50 pages, setting out national priorities only where required. It is intended to make planning less complex and more accessible to people and communities and to promote sustainable growth.

2.3 The Government state that they want to overhaul current planning policy so Councils and communities have more control and flexibility over planning decisions, made through a faster and leaner planning system. These policies set out the Government's vision of sustainable development and apply to the preparation of local and neighbourhood plans and to development management decisions.

2.4 The Framework will be supplemented by national policy statements on nationally significant infrastructure projects and on gypsies and travellers.

## 3. Contents of the Draft National Planning Policy Framework

3.1 Its purpose is Delivering Sustainable Development Defined as 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.'(Bruntland Commission 1987)

### **The presumption in favour of sustainable development.**

3.2 Local planning authorities should plan positively for new development and approve all individual proposals wherever possible. They should-

- Prepare Local Plans (*Officer Comment- The Government guidance refers to Local Plans rather than the Local Development Framework or Core Strategies.*) on the basis that development needs should be met and with sufficient flexibility to respond to rapid shifts in demand or other economic changes.
- Approve development proposals that accord with statutory plans without delay.
- **Grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.**

*3.3 Officer comment -as this Council has up to date Core Strategy policies, it should not have to grant permission on unallocated sites. However, this part of the guidance could give rise to speculative development applications and appeals on unallocated sites. The preparation of the Site Allocations and Development Management Policies DPD is at an early stage.*

3.4 All of these policies should apply unless the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

All plans should be based upon the presumption in favour of sustainable development, with clear policies to guide how it will be applied locally.

### **3.5 The presumption will affect how communities engage in neighbourhood planning.**

**Neighbourhoods should;**

- **Develop plans that support development needs set out in Local Plans, including policies for housing and economic development.**
- **Plan to support local development, with the power to promote more development than is set out in the Local Plan.**
- **Identify opportunities to use neighbourhood development orders to grant planning permission for developments that are consistent with an adopted neighbourhood plan.**

*3.6 Officer Comment- concern over the prospect of small numbers of unelected persons representing neighbourhoods promoting more development than is set out in the Local Plan. Also concern that neighbourhoods could grant permission using neighbourhood development orders. This raises questions about how neighbourhoods will deal with planning guidance, representations opposed to this development, statutory consultees and the use of S106 agreements or the Community Infrastructure Levy.*

**3.7 National incentives and local charges will help ensure local communities benefit directly from the increase in development.** Revenue generated from development will sustain local services, fund infrastructure and deliver environmental enhancement.

*Officer Comment- concern over the advisability of unelected neighbourhood groups being responsible for potentially large sums of money.*

### Core planning principles

3.8 Planning should be plan-led, succinct Local Plans setting out a positive long-term vision.

These Plans should be kept up to date.

Planning should proactively drive and support development. Housing, business and other development needs should be identified and met. **Decision takers at every level should assume the default answer to development proposals is yes,**

**except where it would compromise the key sustainable development principles set out in this Framework.**

#### Plan- making

3.9 Each local planning authority should produce a local plan for its area. This can be reviewed in whole or in part. Any additional development plan documents should only be used where clearly justified. **Supplementary planning documents should only be necessary to bring forward sustainable development at an accelerated rate and must not be used to add to the financial burdens on development.**

*Officer Comment- This would appear to allow development briefs and master plans but to exclude supplementary guidance on topics such as affordable housing provision, open space standards, external lighting, shop-fronts and signs, design issues or car parking standards, which the Council has used to provide development guidance up to now.*

3.10 Local Plans are the key to delivering development that reflects the vision and aspiration of local communities. To do this needs early and meaningful engagement with neighbourhoods, local organisations and businesses.

**Up to date local plans, consistent with this framework, should be in place as soon as practicable. In the absence of an up to date and consistent plan, planning applications should be determined in accord with this Framework, including its presumption in favour of sustainable development. It will be open to local authorities to seek a certificate of conformity with the Framework.**

*3.11 Officer Comment- The impact assessment that accompanies the National Planning Policy Framework states that only 53% of Councils have published a Core Strategy and only 30% have an adopted Core Strategy in place. The Government intends that this guidance will encourage local authorities to prepare and adopt Core Strategies more quickly. This Council will need to seek a certificate of conformity for the Core Strategy as soon as these are available.*

#### Using a proportionate evidence base

3.12 The Local Plan must be based on adequate, up to date, relevant evidence about economic, social and environmental characteristics of the area. Consult key stakeholders on evidence required.

- **Ensure viability and deliverability by ensuring that costs of obligations provide acceptable returns to a willing landowner and willing developer to enable development to be deliverable.**
- **Set out requirements for affordable housing in the local plan. Where practical Community Infrastructure Levy (CIL) charges should be worked up and tested alongside the Local Plan.**
- **CIL should incentivise development by placing control over a meaningful proportion of funds raised with neighbourhoods where development takes place.**
- **Assess cumulative impact of existing and proposed local standards, supplementary planning documents and policies on development to ensure this does not put implementation at risk.**

#### **3.13 Plan strategically across local boundaries**

The Government expects joint working on areas of common interest and to demonstrate this when Local Plans are submitted for examination. **Prepare joint planning policies on strategic matters.**

*3.14 Officer Comment- It will be necessary for Councils to work together on issues such as calculating future population and housing needs and major infrastructure such as new roads, railways and power lines, in the absence of Regional Planning. It also does not follow that LPAs will be able to develop their own policy and guidance for issues that have a clearly strategic application (e.g. transport, telecommunications, flooding, town centres etc). Where they may not be aligned with neighbouring authorities on plan-making timescales this could create a worrying vacuum in strategic direction on the larger scale developments which have the greatest impacts.*

#### Examining Local Plans

3.15 Local Plans will be examined by an independent Inspector who will assess if it is **in accordance with a Duty to Cooperate**, in addition to legal procedures and whether it is sound. (ie Positively prepared, justified, effective and consistent with national policy.)

#### **Neighbourhood Plans**

**3.16 Parishes and neighbourhood forums can use these to develop a shared vision for their neighbourhood, set development policies, grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders.**

**3.17 Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities must set out their strategic policies for the area. Neighbourhoods will have the power to promote more development than is set out in the strategic policies of the Local Plan.**

**3.18 When a neighbourhood plan is made, the policies it contains take precedence over existing policies in the Local Plan for that neighbourhood, where they are in conflict. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation.**

**3.19 A neighbourhood plan must be assessed by an independent examiner before it can go to a local referendum. To pass the independent examination, it must have regard to policies in the National Planning Policy Framework, be in general conformity with strategic policies in the Local Plan, and be compatible with EU obligations and human rights requirements.**

*3.20 Officer Comment- Neighbourhoods are likely to need officer support to prepare plans in accordance with these requirements, which could result in costs to the local authority.*

#### Development Management (DM)

3.21 The primary object of Development Management is to foster delivery of sustainable development, not to hinder or prevent development. **The application of the presumption in favour of sustainable development should achieve the delivery of enhanced levels of development.**

#### Determining applications

3.22 Planning system is plan-led. **Local Plans, incorporating neighbourhood plans where relevant, are the starting point for determining planning applications.**

In determining applications, local planning authorities should apply the presumption in favour of sustainable development.

*3.23 Officer Comment- This section includes a series of statements that present Development Management as a straightforward, almost administrative process. The section headed determining applications is no more than 3 sentences. This completely ignores the often complicated interplay of pressures for and against development that are central to the weighing of considerations that a planning officer will need to undertake and which will not necessarily become fully evident until the application has been received and formal consultation has taken place. To leave the decision making to an assessment of whether or not a proposal falls within the definition of "sustainable development" and to then rely on this policy document (together with Core Strategies/DPDs where they exist) as the main determinant of that assessment seems much too vague for the range of applications that LPAs consider. It does not follow that because existing guidance is lengthy it cannot be useful. It is precisely because certain issues are difficult and require more specialist knowledge/guidance that the existing range and detail of guidance has emerged*

### **Local development orders**

**3.24 Local planning authorities should consider using these to relax planning controls for particular areas or categories of development, where impacts would be acceptable and where this would boost enterprise and growth.** Limit use of Article 4 directions to remove national permitted development (PD) rights, to where necessary to protect local amenity or well-being of the area (**could include Article 4 directions to prevent demolition of local facilities.**)

**3.25 Neighbourhood Development and Community Right to Build Orders**  
**Neighbourhoods can use neighbourhood development orders to grant planning permission. The developments permitted through a neighbourhood development order will not require further planning permission from local planning authorities.**

**3.26 Community right to build orders require support of the local community through a referendum. Local planning authorities should take a positive approach to proposals, working with community organisations to resolve issues before draft orders are submitted for examination. Independent examiners should apply the presumption in favour of sustainable development when considering draft Orders.**

### Planning for Prosperity

3.27 Government is committed to securing sustainable growth, meeting development needs of business, promoting vitality and viability of town centres and promoting thriving, inclusive and locally distinctive rural economies.

### Promote the vitality and viability of town centres

3.28 Allocate a range of sites for retail, leisure, commercial, community and residential development needed in town centres. Meet retail and leisure needs in full - not compromised by limited site availability. Assess need to expand town centres to ensure a sufficient supply of suitable sites. Sequential approach to retail and leisure uses that are not in an existing centre and are not in accordance with an up to date Local Plan.

Require impact assessment outside town centres if over a proportionate locally set threshold, default if no threshold is 2,500 sq m.

**Office developments have been removed from town centre policy. They will no longer need to comply with the sequential approach of town centre first.**

### Support the Rural Economy

3.29 Support sustainable growth of rural businesses, promote development and diversification of agricultural businesses, support sustainable rural tourism and leisure developments that respect the character of the countryside, including supporting provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.

### Transport

3.30 Transport system needs to be balanced in favour of sustainable transport modes. Government recognises opportunities to maximise these will vary from urban to rural areas.

Facilitate economic growth. Support reductions in greenhouse gas emissions and congestion.

Promote accessibility through planning for location and mix of development.

Primary function of roadside facilities should be to support the safety and welfare of the road user. **The NPPF removes the maximum non- residential car parking standards for major developments.**

Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.

### **Communications infrastructure**

3.31 Essential for economic growth. Facilitate growth of new and existing telecommunications systems to ensure choice of providers and services and equitable access to new technology.

Keep masts and sites to a minimum. Do not impose a ban on new telecommunications development in certain areas, blanket Article 4 directions, or insist upon minimum distances between existing development and new telecommunications development. Local planning authorities should not question whether the service is needed, nor seek to prevent competition and must determine applications on planning grounds.

### Minerals

3.32 Secure an adequate supply and facilitate use of energy minerals. Define Minerals Safeguarding Areas. **The requirement for local councils to set criteria for the selection of sites for future peat extraction is proposed to be removed.**

### Housing

**3 33 Government aims to increase significantly the delivery of new homes.** Use evidence-base to meet **full requirements** for market and affordable housing in the housing market area. Identify key sites for housing. **Removal of brownfield target for housing development. (Set at 60% in 1998) to allow Councils to assess land for its suitability for development.**

*3.34 Officer Comment- The Core Strategy does not meet the full requirement for affordable housing set out in the current Strategic Housing Market Assessment. (SHMA) It would be advisable to commission an up to date SHMA as evidence for the Site Allocations Development Plan Document. Braintree Local Plan Review and Core Strategy did not set out a specific brownfield target as the Planning Inspectors who examined these plans recognised that the target was difficult to achieve in a rural area without large areas of brownfield land.*

3.35 Councils must identify a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements.

**The supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land.**

*3.36 Officer Comment- At present, the Council can demonstrate that the Braintree Core Strategy has 20% over the housing supply target. It will be necessary to demonstrate this in order to obtain a certificate of conformity for the Core Strategy with the N P P F. Housing supply targets for this District will rise in the future as they will require this additional 20% to ensure choice and competition. It will be necessary to identify additional housing sites in the Site Allocations plan to maintain this 20% in the future.*

**3.37 Planning permission should be granted where relevant policies are out of date, eg where an authority cannot demonstrate an up to date 5 year supply of deliverable housing sites.**

**Removal of the national minimum site size threshold for requiring affordable housing to be delivered. (Currently 15 dwellings)** *Officer Comment- This gives control to local Councils but would not affect Braintree District as the Core Strategy policies define thresholds for rural and urban areas.*

**3.38 In rural areas, local planning authorities (LPA's) should plan development to reflect local requirements, particularly for affordable housing. LPA's should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. Removal of guidance allowing rural exception sites outside development boundaries for affordable housing.**

*3.39 Officer Comment- Braintree Council, working with Parish Councils, has promoted a large number of rural exception sites (on sites outside and adjacent to village envelopes) over the last 20 years, which has been successful in meeting some of the need for affordable rural housing for local people. This will no longer be permissible.*

**3.40 Create sustainable communities. Protect community facilities by asking Councils to consider the availability and viability of community facilities as part of the plan making process and to develop policies to safeguard against their unnecessary loss.**

**3.41 Green infrastructure- to secure more strategic networks of green infrastructure.**

**A new protection for locally important green space. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out development other than in very special circumstances. Local Green Spaces should only be designated when a plan is prepared or reviewed and planned so that they are capable of enduring beyond the end of the plan period.**

**The Local Green Space designation will not be appropriate for most green areas or open space. Local green space policy should be consistent with policy for Green Belts.**

*3.42 Officer Comment- This new protection might be used to protect suitable areas in the Site Allocations Document.*



## **Consultation Questions**

(b) Consultation questions

### **Delivering Sustainable Development**

The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.

#### **1(a) – Do you agree?**

- |                           |                          |
|---------------------------|--------------------------|
| <b>Strongly agree</b>     | <input type="checkbox"/> |
| <b>Agree</b>              |                          |
| Neither agree or Disagree | <input type="checkbox"/> |
| Disagree                  | <input type="checkbox"/> |
| Strongly Disagree         | x                        |

#### **1(b) Do you have comments?**

Paragraphs 20-52 The framework guidance provides an insufficient level of detail required for plan preparation. This is a complex matter which was covered in detail in the existing guidance. The removal of this guidance will make it more difficult for Council's to prepare policy documents with certainty and could lead to more lengthy periods of examination and increased costs. The presumption in favour of sustainable development could give rise to speculative development applications and appeals on unallocated sites to the detriment of the environment and contrary to local neighbourhood and community wishes.

### **Plan-making**

The Framework has clarified the tests of soundness, and introduces a useful additional test to ensure local plans are positively prepared to meet objectively assessed need and infrastructure requirements.

#### **2(a) Do you agree?**

- |                           |                                     |
|---------------------------|-------------------------------------|
| <b>Strongly agree</b>     | <input type="checkbox"/>            |
| <b>Agree</b>              | <input checked="" type="checkbox"/> |
| Neither agree or Disagree | <input type="checkbox"/>            |
| Disagree                  | <input type="checkbox"/>            |
| Strongly Disagree         | <input type="checkbox"/>            |

#### **2(b) Do you have comments? (please begin with relevant paragraph number)**

The policies for planning strategically across local boundaries provide a clear framework and enough flexibility for councils and other bodies to work together effectively.

#### **2(c) Do you agree?**

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

**2(d) Do you have comments? (please begin with relevant paragraph number)**

44-47 It does not follow that LPAs will be able to develop their own policy and guidance for issues that have a clearly strategic application (e.g. transport, telecommunications, flooding, town centres etc). Where they may not be aligned with neighbouring authorities on plan-making timescales this could create a worrying vacuum in strategic direction on the larger scale developments which have the greatest impacts.

**Decision taking**

**In the policies on development management, the level of detail is appropriate.**

**3(a) Do you agree**

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

**3(b) Do you have comments? (please begin with relevant paragraph number)**

53-70 This section includes a series of statements that present Development Management as a straightforward, almost administrative process. The section headed determining applications is no more than 3 sentences. This completely ignores the often complicated interplay of pressures for and against development that are central to the weighing of considerations that a planning officer will need to undertake and which will not necessarily become fully evident until the application has been received and formal consultation has taken place. To leave the decision making to an assessment of whether or not a proposal falls within the definition of "sustainable development" and to then rely on this policy document (together with Core Strategies/DPDs where they exist) as the main determinant of that assessment seems much too vague for the range of applications that LPAs consider. It does not follow that because existing guidance is lengthy it cannot be useful. It is precisely because certain issues are difficult and require more specialist knowledge/guidance that the existing range and detail of guidance has emerged. It also does not follow that LPAs will be able to develop their own policy and guidance for issues that have a clearly strategic application (e.g. transport, telecommunications, flooding, town centres etc). Where they may not be aligned with neighbouring authorities on plan-making timescales this could create a worrying vacuum in strategic direction on the larger scale developments which have the greatest impacts.

56-61 Many authorities, including Braintree DC, have encouraged pre-application dialogue and pre-application consultation with the local community so this guidance about the pre-application process is not new;

it's just shorter.

Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.

**4(a) Do you agree**

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

**4(b) What should any separate guidance cover and who is best placed to provide it?**

Separate guidance should cover detailed planning issues required for policy preparation and development management. DCLG or Planning Advisory Service best placed to provide it.

**Business and economic development**

The 'planning for business policies' will encourage economic activity and give business the certainty and confidence to invest.

**5(a) Do you agree?**

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

**5(b) Do you have comments? (please begin with relevant paragraph number)**

29-30 Insufficient detail in NPPF

**5(c) What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?**

Core Strategies set out their own monitoring issues including dwelling completions and housing trajectories

**The town centre policies will enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres.**

**6(a) Do you agree?**

- Strongly agree
- Agree
- Neither agree or Disagree
- Disagree
- Strongly Disagree

**6(b) Do you have comments? (please begin with relevant paragraph number)**

76-80 Insufficient detail to provide robust guidance. Removal of office development from sequential approach will not encourage businesses in town centres

**Transport**

The policy on planning for transport takes the right approach.

**7(a) Do you agree?**

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

**7(b) Do you have comments? (please begin with relevant paragraph number)**

**Communications infrastructure**

Policy on communications infrastructure is adequate to allow effective communications development and technological advances.

**8(a) Do you agree?**

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

**8(b) Do you have comments? (please begin with relevant paragraph number)**

Insufficient detail to be robust

## Minerals

The policies on minerals planning adopt the right approach.

9(a) Do you agree?

- |                           |                                     |
|---------------------------|-------------------------------------|
| Strongly Agree            | <input type="checkbox"/>            |
| Agree                     | <input type="checkbox"/>            |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree                  | <input type="checkbox"/>            |
| Strongly Disagree         | <input type="checkbox"/>            |

9(b) Do you have comments? (please begin with relevant paragraph number)

## Housing

The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.

10(a) Do you agree?

- |                           |                                     |
|---------------------------|-------------------------------------|
| Strongly Agree            | <input type="checkbox"/>            |
| Agree                     | <input type="checkbox"/>            |
| Neither Agree or Disagree | <input type="checkbox"/>            |
| Disagree                  | <input checked="" type="checkbox"/> |
| Strongly Disagree         | <input type="checkbox"/>            |

10(b) Do you have comments? (please begin with relevant paragraph number)

49-52 Concern over the prospect of small numbers of unelected persons representing neighbourhoods promoting more development than is set out in the Local Plan, which has been democratically prepared.

## Planning for schools

The policy on planning for schools takes the right approach.

11(a) Do you agree?

- |                           |                                     |
|---------------------------|-------------------------------------|
| Strongly Agree            | <input type="checkbox"/>            |
| Agree                     | <input type="checkbox"/>            |
| Neither Agree or Disagree | <input checked="" type="checkbox"/> |
| Disagree                  | <input type="checkbox"/>            |
| Strongly Disagree         | <input type="checkbox"/>            |

**11(b) Do you have comments? (please begin with relevant paragraph number)**

**Design**

The policy on planning and design is appropriate and useful.

**12(a) Do you agree?**

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

**12(b) Do you have comments? (please begin with relevant paragraph number)**

Removal of supplementary planning guidance on design will be detrimental

**Green Belt**

The policy on planning and the Green Belt gives a strong clear message on Green Belt protection.

**13(a) Do you agree?**

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

**13(b) Do you have comments? (please begin with relevant paragraph number)**

**Climate change, flooding and coastal change**

The policy relating to climate change takes the right approach.

**14(a) Do you agree?**

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree

Strongly Disagree

**14(b) Do you have comments? (please begin with relevant paragraph number)**

The policy on renewable energy will support the delivery of renewable and low carbon energy.

**14(c) Do you agree?**

**Strongly Agree**

**Agree**

Neither Agree or Disagree

Disagree

Strongly Disagree

**14(d) Do you have comments? (please begin with relevant paragraph number)**

The draft Framework sets out clear and workable proposals for plan-making and development management for renewable and low carbon energy, including the test for developments proposed outside of opportunity areas identified by local authorities.

**14(e) Do you agree?**

**Strongly Agree**

**Agree**

Neither Agree or Disagree

Disagree

Strongly Disagree

**14(f) Do you have comments? (please begin with relevant paragraph number)**

The policy on flooding and coastal change provides the right level of protection.

**14(g) Do you agree?**

**Strongly Agree**

**Agree**

Neither Agree or Disagree

Disagree

Strongly Disagree

**14(h) Do you have comments? (please begin with relevant paragraph number)**

**Natural and local Environment**

Policy relating to the natural and local environment provides the appropriate framework to protect and enhance the environment.

**15(a) Do you agree?**

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

**15(b) Do you have comments? (please begin with relevant paragraph number)**

163-175 Presumption in favour of development and default answer to development being yes would not protect and enhance the environment

**Historic Environment**

This policy provides the right level of protection for heritage assets.

**16(a) Do you agree?**

- Strongly Agree
- Agree
- Neither Agree or Disagree
- Disagree
- Strongly Disagree

**16(b) Do you have comments? (please begin with relevant paragraph number)**

176- 191Presumption in favour of development and default answer to development being yes and absence of supplementary planning guidance might not protect heritage assets

**Planning for Travellers**

18 Do you have views on the consistency of the draft Framework with the draft planning policy for traveller sites, or any other comments about the Government's plans to incorporate planning policy on traveller sites into the final National Planning Policy Framework?

The presumption in favour of sustainable development could lead to appeals being allowed for travellers sites even in cases where there is a lack of evidence of local need for these.



Advice should require preparation of Gypsy and Traveller Assessments to provide a robust assessment of the need for local sites.