

NPPF Consultation Response Template

This is a “template response” for the government’s consultation on the *National Planning Policy Framework*. It is what **Steady State Manchester** will be submitting. While most of the wording is our own, for some questions we have drawn on draft submissions from *Friends of Carrington Moss* and the *CPRE*, where they have added to our own responses and where (as in most cases) we agree. We are also grateful to the *Community Planning Alliance* for provision of a blank template with the questions.

As respondents, you may use the wording below, but we encourage you to personalise and amend it. You can also just use some of the material in your response and there is no need to respond to every question.

The **deadline** for the consultation is: *11.45pm on 2 March 2023*.

You can **respond online** at: <https://consult.levellingup.gov.uk/planning-policy-and-reform/levelling-up-and-regeneration-bill-reforms-to-nati> (the government encourages this to aid their collation of responses; however the format is not really suitable if you have prepared your answers offline – there are 57 separate questions!)

Or you can **send your response to**: PlanningPolicyConsultation@levellingup.gov.uk

The consultation website is at: <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy#fnref:8>

The draft of the revised NPPF wording is at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1126647/NPPF_July_2021_-_showing_proposed_changes.pdf

If you find this template helpful, then please do let us know.

Q no.	Consultation Question	Y/N/ other	Suggested response
1	Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?	Y	<p>The current, flawed, policy assumption is that insufficient availability of building land is a fundamental cause of the housing crisis. It leads to a number of distortions in the planning system.</p> <ol style="list-style-type: none"> 1) The use of inflated population data in the standard methodology (i.e. the now superseded 2014 ONS estimates) 2) A 300,000 annual housing target that is in excess even of the 2014 ONS data, which only indicates (on an already inflated population estimate) 214,000 homes per annum. 3) An automatic presumption in favour of granting planning permission where the local authority is unable to demonstrate a five-year land supply. 4) Sanctions on Local Planning Authorities for not meeting house building targets despite the fact that they are not the builders, and it is developers who decide the rate of build according to profitability (i.e. restriction of supply to ensure higher prices). 5) As the CPRE report, "Targeting the Countryside" showed, a "loophole in national planning policy allows developers to bypass local democracy and gain planning permission for large housing developments in the countryside". This works in the following way. Developers present the case that land with permission for houses is not deliverable (often brownfield sites)

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>in the next five years and therefore does not form part of the 5-year housing supply. This reduces the housing land supply to less than the required five years, rendering the plan “out of date” and thereby having no authority. In doing this the weight given to delivery of housing on other land ‘off local-plan’ sites is substantial. By causing local authorities to fail the Housing Delivery Test, local plan policy is silenced.</p> <p>So, the existing rolling land supply requirement is unnecessary and encourages the over-identification of sites which then fall prey to land value speculation / inflation. It is also onerous for under-resourced council planning departments.</p> <p>We agree that other incentives should be offered for Local Plan completion. LAs should be focused on what is beneficial to their communities. Constrained resources should be focused on ensuring the LA has an up-to-date, accurate and complete evidence base which is regularly reviewed and updated. SHLAAs should be annually updated and published on council website.</p> <p>We also propose two further amendments to the NPPF text.</p> <p>1) Amend paragraph 49 to remove the automatic presumption in favour of granting planning permission where the local authority is unable to demonstrate a five-year land supply. Should, against our suggestion, this text be left in, then it</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>should also be made clear in these cases that developers should still be expected to meet local policy objectives, such as using brownfield sites before greenfield.</p> <p>2) Add a clause to ensure that where an up to date Local or Neighbourhood Plan is in place, development of inappropriate and unallocated sites will not be permitted at appeal.</p>
2	Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?	Y	<p>While it is possible that some development land becomes unavailable, just as additional land (e.g. "windfall sites") can become available, under-delivery of agreed housing development is not primarily as result of lack of land. The supply buffer encourages the over-identification of land for development, eroding green belt and other green spaces, creating planning blight and land value speculation and inflation, which in turn impacts on house prices.</p> <p>We therefore propose the immediate abolition of the requirement in the NPPF to allocate an additional 20% 'buffer' of 'deliverable' housing sites since it exacerbates already unrealistic building targets.</p>
3	Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an	Y	Yes, we support this proposal.

Q no.	Consultation Question	Y/N/ other	Suggested response
	alternative approach that is preferable?		
4	What should any planning guidance dealing with oversupply and undersupply say?	Other	When considering the volume of housing or employment land supply required to meet a Local Authority's needs, planning policies and guidance need to focus on building a minimum number of social homes to meet local need, the re-use of brownfield land and genuinely sustainable development. The over/under supply of market priced housing, based on out of date information, does not achieve any of those aims and indeed is likely to have the contrary effect.
5	Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?	Y	<p>We agree with the proposal to extend protection to neighbourhood plans that are up to 5 years old instead of the current 2 years and to remove the tests on minimum housing land supply and minimum delivery.</p> <p>We also suggest amending the paragraph to make it clear that meeting housing demand does not have greater weight than environmental and social sustainability in plan making and development management.</p> <p>Neighbourhood Plans take a considerable amount of voluntary time and labour from community members. They should benefit from improved protection and therefore an enhanced status for these plans which do give community input to the planning</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>process at a very practical level. However, Neighbourhood Plans are only one vehicle that enables communities to have a say in planning and the NPPF should require authorities to support communities in different ways.</p>
6	<p>Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?</p>	Other	<p>A stronger recognition that planning should serve the needs of communities is to be welcomed. That recognition should extend to both current and future community members, in keeping with the accepted definition of sustainable development.</p> <p>More emphasis should be given to supplying a minimum number of homes for social rent to meet local need, the re-use of brownfield land and genuinely sustainable development. There should also be some focus on SME and public sector housing companies builders and as the planning system currently favours the large volume developers who do not respond to priority social need.</p> <p>It is not sufficient to mandate the number of homes to be provided. The Government should mandate that amenities, sustainable transport, schools and health services facilities are in place before the development is complete.</p> <p>All new developments should meet a minimum standard for green space, a proportion of which should be rich in biological</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			diversity.
7	What are your views on the implications these changes may have on plan-making and housing supply?	Other	<p>The proposed changes are unlikely to materially affect housing supply. There is a current bias towards the release of land for development, land that does not usually contribute to meeting the needs of those most in housing need, i.e. homeless people and those who require affordable rented accommodation at a "social rent" level. Instead the current oversupply benefits land-banking and speculative investment and development. So both a stronger statutory planning process is needed but one that does not build in perverse targets.</p> <p>In relation to local housing need and the standard method, for Chapter 5, paragraph 60, we believe the change should read "The overall aim should be to meet required local housing need, <u>including genuinely affordable homes</u>, as much housing need as possible with an appropriate mix of housing types to meet the needs of as agreed with local communities, with a focus on provision via the reuse of previously developed land". Whilst we welcome the clarification that the outcome of the Standard Method is advisory, it is still based on out of date information aiming to achieve an unevidenced housing requirement number (300,000). The Standard Method should be updated to incorporate the latest available information (currently the Census 2021) and should specifically reference</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>the number of genuinely affordable homes (social housing) to be provided by a Local Authority. It is likely there is will be fewer challenges to the appropriateness of the Standard Method if it is based on up to date information.</p> <p>The inclusion of an "affordability ratio" within the Standard Method should be abandoned. Increasing the number of homes built in an area does not result in lower house prices and as noted above, the rate of build does not depend on the housing target but the rate at which profit-seeking developers are prepared to release homes for sale.</p>
8	<p>Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?</p>	Y	<p>Given that, to our knowledge, few local authorities have successfully made the case for using exceptional circumstances, a relaxation of the criteria (explicit and explicit) for claiming exceptional circumstances would be appropriate. The vague term "particular characteristics of an authority" wording should be expanded with illustrative (but not definitive) examples: homelessness levels, shortfall of affordable and social rent accommodation, environmental circumstances (e.g. flood risk and ecological factors that constrain available land), as well as specific population data and intelligence on vacant homes and problem levels of speculative investment (as in London and Manchester) and its impact on housing availability and affordability.</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>Since there is no concrete policy wording offered, we suggest that a further consultation be conducted on the wording of the guidance on estimating housing need, including criteria for using a locally designed method.</p>
9	<p>Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?</p>	Y	<p>Yes, we strongly support this. Since 2013/14 England has lost over 25,110 hectares of Green Belt, with various natural capital and ecosystem services attributes and community health and wellbeing benefits, that are now forever lost to future generations.</p> <p>Green Belt should not be released unless need can be fully substantiated (ie that all brownfield land has been developed). It should be noted that Green Belt is favoured because it is financially advantageous for the developer.</p> <p>The Treasury should be encouraged to change tax laws to make development on brownfield sites tax-free and development on Green Belt tax-heavy.</p> <p>We also note that not all sensitive green space is Green Belt. Inner urban areas often lack green space but there is pressure to build on what there is. Local authorities such as Manchester routinely allow green space that is valued by local communities to be built on, ignoring the results of public consultations and campaigns, sealing the soil, increasing the risk of urban heat island effects and removing amenity. There</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			should be disincentives against building on urban green space.
10	Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?	Y	<p>Robust data on shortfall of housing supply, fine grain analysis of what "character of the local area" means (e.g. historical and amenity considerations), mitigation measures to be taken, for example to avoid the urban heat island effect, shading of existing homes and gardens, or avoid wind-funneling by poor siting of higher rise buildings.</p> <p>Authorities should be expected to retain sufficient land for community green space (parks, squares, boulevards and avenues with planting, along watercourses, access for all sports fields, and allotments for rent. Resilience planning, against geopolitical and ecological supply shocks should inform the preservation of undeveloped land, for example for local food production as in the 1939-45 war.</p> <p>A comprehensive assessment of the life-cycle carbon and pollution implications of every development should be an explicit requirement. Over-development could significantly increase carbon emissions and air, noise and light pollution in a locality. Over-development can also result in high harm to landscapes, ecology and heritage assets, along with sports and recreational provision (new roads can, for example, fracture public rights of way, active travel and leisure pathways or wildlife corridors) - an assessment of the harm to ecological</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			and natural environmental assets should also be an explicit requirement.
11	Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?	N	<p>We disagree with the removal of the explicit requirement for plans to be justified. While evidence and its evaluation should be proportionate, there is a danger in weakening the requirement for authorities to justify their proposals. We propose that a revised definition of "justified" should be used, couched in ecological and social terms - i.e. protecting the environment while meeting social need. The emphasis needs to place merely economic and financial considerations below those two desiderata.</p> <p>Therefore, Planning Authorities should use up-to-date, accurate and comprehensive evidence in both plan making and development management. Whilst the evidence must be credible, it should be easily and transparently understandable by residents. Whilst such evidence will typically be based on professional expertise, appropriate evidence, collected and presented by the local community should be given weight. Detailed information should be accessible to residents that demonstrates the implications for carbon, pollution and ecosystem impacts, of each development.</p>
12	Do you agree with our proposal to not apply revised tests of soundness	N	There are a number of plans at this stage of development. If implemented they would together undermine the objectives of

Q no.	Consultation Question	Y/N/ other	Suggested response
	to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?		this planning reform. For example, in Greater Manchester, the Places for Everyone, Joint Strategic Plan, now going through its Planning Inspectorate examination, uses the standard housing need assessment, uses a disproportionate buffer for both housing and industrial land, and will take some 2500 ha out of the Green Belt. Yet even the housing need identified in with standard ONS 2014-based methodology could be met without any Green Belt withdrawals. It would therefore be a travesty if this reform did not apply to plans that are months away from final agreement and which, although "sound" in current legal terms, are based on flawed assumptions and which would fail the revised understanding of soundness in the revised NPPF. Such plans should not have a lower bar to pass than later ones.
13	Do you agree that we should make a change to the Framework on the application of the urban uplift?	N	While supporting the principle of some increase in urban density to reduce commuter travel, we are concerned by the creation of what are effectively "new towns", in urban centres such as the centre of Manchester. These lack the kind of amenities the population requires, involve a socially unsatisfactory population structure (due to the predominance of 1 and 2 bed homes), and because they rely on high rise construction, have additional carbon costs, both in construction and operation. Moreover they contribute to the urban heat island effect, of particular concern given rapid

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>global heating over the course of this century.</p> <p>We therefore suggest that any such uplift is not applied in a formulaic mechanical way, but rather acts to encourage development of England's "missing urban middle": between the green belt and the dense urban core, our conurbations have low density sprawling settlements and many district centres in decline. This contrasts with European continental cities where medium rise settlement is more the norm, resulting in more compact urban areas.</p> <p>It would be worth selectively extending an uplift, on these terms, to other urban centres, some of which have considerable brownfield land.</p>
14	<p>What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?</p>	Other	<p>As indicated above, they need to consider the total urban environment, in terms of community design and development, ecological and climate mitigation, liveability, resilience to environmental and other systemic shocks. At present, so called spatial planning hardly begins to consider such questions, failing to address the fundamental one of "what kind of settlements do we actually want for the future?".</p>
15	<p>How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also</p>	Other	<p>With caution. For example, hyper-density in some areas is likely to cause additional transit activity and demand, while somewhat lower densities would allow better outcomes. The model of the 20 minute city, adopted by a number of leading</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
	functions as part of the wider economic, transport or housing market for the core town/city?		global cities, should be used as a guide.
16	Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?	Other	It is critical that Local Authorities (and communities) are not penalised because developers do not build out land with planning permission. Where Authorities have a large amount of brownfield which needs investment to make it viable, there should be Government funding available to support such regeneration (where public funding is invested in a site, a financial return should be accessible for the public purse). This should include funding that is available for communities to bid for to bring local brownfield sites back into use.
17	Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?	Y	
18	Do you support adding an additional permissions-based test that will 'switch off' the application of the presumption in favour of sustainable development where an	Y	We would actually argue for a presumption <i>against</i> development. This would not mean no development, but would reverse the tilt of the playing field, so that stronger evidence of the need for building projects had to be furnished.

Q no.	Consultation Question	Y/N/ other	Suggested response
	authority can demonstrate sufficient permissions to meet its housing requirement?		
19	Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?	Other	please see previous answer
20	Do you have views on a robust method for counting deliverable homes permissioned for these purposes?	Y	<p>LAs should report the number of housing units and employment space approved each quarter. For the initial report LAs should be asked for information about the number of housing units (and employment space approved in the previous 10 years where development has not commenced. This information can then be compared to the Net number of New Homes built each quarter. Anomalies should be investigated but this should provide clear information about the number of units (or space) approved which should be taken into consideration in determining the reasons for under-delivery of homes or employment space.</p> <p>LAs should not be penalised because developers do not deliver against agreed planning permission.</p>
21	What are your views on the right		

Q no.	Consultation Question	Y/N/ other	Suggested response
	approach to applying Housing Delivery Test consequences pending the 2022 results?		
22	Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?	Y	<p>We very much support this proposal. Availability of homes for Social Rent is a major factor in causing homelessness and housing precarity. This is far more significant than the supply of land for the housing market.</p> <p>Social rent should be taken to mean homes that are available for below market rents in perpetuity: shared ownership in which homes can transfer to being privately owned should not count.</p>
23	Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?	Other	<p>Housing provision for older people must be considered as part and parcel of an integrated social policy for older citizens. It needs to focus on least restrictive and segregative alternatives so people can be supported to stay in their homes, use less of their homes, downsize and ultimately access specialist accommodation. Housing policy cannot operate in isolation from this. Specialist housing should not be seen as the norm: new homes should be built to Lifetime Homes (M4(2)) standards as per previous Government requirements.</p>
24	Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in	Y	<p>Bringing additional weight to this policy is important, to the extent that the promotion of smaller, brownfield sites will sustainably bring previously developed land back into use, typically in sustainable locations, reducing the blight brownfield</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
	paragraph 69 of the existing Framework)?		can bring in some areas. It will also reduce pressure on greenfield sites, subject to the caveat that brownfields that have already reverted to nature should be treated as greenfields.
25	How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?	Other	Mechanisms to prevent land banking of deteriorating sites should be strengthened by compulsory purchase or confiscation if necessary. Derelict small sites create a blight on communities.
26	Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?	Y	Yes, but the definition of Affordable Housing should be changed to make it clear that LAs are required to achieve a target number of homes for social rent (so each type of "Affordable" housing should be defined separately, rather than collectively). It should be accepted that "affordable home ownership" will be out of reach for many citizens. The “Right to Buy” should be abolished since it perniciously reduces the availability of housing at a social rent. Shared ownership is a route into private ownership and this should not be considered a form of social rent.
27	Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable	Y	There are many changes that could and should be made to encourage community led housing. Authorities could be required to consider as a first option community proposals for sites and to encourage and support local community land

Q no.	Consultation Question	Y/N/ other	Suggested response
	housing?		trusts.
28	Is there anything else that you think would help community groups in delivering affordable housing on exception sites?	Y	The NPPF should include provisions for the support of Community Land Trusts and community led housing. Priority should be given to local community views in planning applications. Local communities are knowledgeable about housing needs and can can advocate for affordable housing: their views are often over-ridden by developers' views and through planning appeals by the Planning Inspectorate. There should be a requirement by the Planning Inspectorate to meet with local community groups whose views have been over-ridden.
29	Is there anything else national planning policy could do to support community-led developments?	Y	There should be a presumption in favour of community led development, This should not rely only on Neighbourhood Planning but require authorities to take into account the many other ways local communities get together in order to make improvements and to advocate for development (or not). It is unacceptable that community led efforts are considered as equivalent to those of large developers with all the resources they bring to bear to developments. The NPF could establish support units for community led developments in all authorities, with the appropriate resources allocated.
30	Do you agree in principle that an applicant's past behaviour should	Y	Yes - it is unacceptable that those with previous bad form with regard to planning should be permitted to submit further

Q no.	Consultation Question	Y/N/ other	Suggested response
	be taken into account into decision making?		applications without this being made known.
31	Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?		Option 2
32	Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?	Y	
33	Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?	Y	However, it should be up to local communities to agree what is considered to be beautiful and well designed; developments should fit with local aspirations for their communities and embrace innovation : beauty cannot be prescribed on a national level. Beautiful development should go beyond the design of building to include water and drought managed landscaping that is climate safe.
34	Do you agree to the proposed	Other	The reference appears to be to 124e not c. Broadly we support

Q no.	Consultation Question	Y/N/ other	Suggested response
	changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places', to further encourage well-designed and beautiful development?		the inclusion of the word "beautiful" but caution that there are multiple interpretations of what that means, and rigid interpretations could act as a barrier to innovative yet attractive design.
35	Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?	Y	To support effective enforcement action, this needs to be mandated, not just encouraged.
36	Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?	Y	We support the idea of "gentle densification" and mansard roofs are one means of facilitating this, subject to adequate design, neighbourhood and appearance considerations. There are many more options for upward extensions beyond mansard roofs that should be considered. Ugly boxes as loft conversions should be discouraged.
37	How do you think national policy on small scale nature interventions	Y	It is essential that "gaming the system" be prevented. Moreover, greater rigour in assessing "biodiversity net gain" is

Q no.	Consultation Question	Y/N/ other	Suggested response
	could be strengthened? For example, in relation to the use of artificial grass by developers in new development?		<p>necessary: there is evidence that plans to date have done this inadequately. On artificial grass specifically, there should be a prohibition on its use.</p> <p>Sites of Biological Importance and Sites of Special Scientific Interest should be easier to designate and all should have an area of buffer encircling them to both ensure protection and enable wildlife migration/connectivity to other sites.</p> <p>Communities should be able to designate small pockets of land for biodiversity enhancement.</p> <p>In principle, Biodiversity Net Gain (BNG) is a sound and welcome step forward in planning for nature: the principle that development should leave nature measurably better is a huge leap forward. However, there are also many concerns arising in practice. Recent peer reviewed research¹ suggests that use of BNG so far is not delivering the intended outcomes: analysis of six early adopter councils found “a 34% reduction in the area of non-urban habitats, generally compensated by commitments to deliver smaller areas of higher-quality habitats years later in the development project cycle” . In other words, quantitative loss now compensated by the promise of qualitative gains well into the future.</p>

¹ Hunter, S. B., zu Ermgassen, S. O. S. E., Downey, H., Griffiths, R. A., & Howe, C. (2021). Evidence shortfalls in the recommendations and guidance underpinning ecological mitigation for infrastructure developments. *Ecological Solutions and Evidence*, 2(3), e12089. <https://doi.org/10.1002/2688-8319.12089>

Q no.	Consultation Question	Y/N/ other	Suggested response
38	Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?	Y	We support this but would extend it to the availability of land for urban growing. This has a high potential yield per ha. and would make a vital contribution to national food security under likely future conditions of supply shocks resulting from climatic, environmental and geopolitical factors. Agricultural land should be specifically protected within the NPPF (not relegated to a footnote).
39	What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?	Other	We strongly support this proposal. Context. Existing national legislation and policy guidance directs plan makers to spell out how their plans will contribute to the climate change. Most local authorities have now declared climate emergencies. A number have also set indicative carbon budgets and target dates, in compliance with the Paris agreement, to which the UK government is a signatory. The <i>Tyndall Centre on Climate Change</i> , at the University of Manchester, has proposed science-based, Paris compliant, fair share carbon budgets for each local authority ² . It is known that buildings contribute some 30 per cent to the UK's territorial carbon emissions and that house-building alone could impact severely on the net zero target ³ . In addition to

² <https://carbonbudget.manchester.ac.uk/reports/>

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>this, embodied emissions contribute to the global total of emissions, which has the effect of further constraining any remaining safe space for emissions in every territory, including England. New building development is both a potential source of new emissions but also a potential opportunity for reductions.</p> <p>Carbon sources</p> <p>Relevant sources of carbon emissions, consequent on planning development are the following.</p> <ul style="list-style-type: none"> • Land use change both changes in flux and changes in store. • Buildings – emissions in use (operational, regulated and unregulated), in the following main categories: Housing, Industry and Warehousing, Offices, Other buildings. • Transport – operational (e.g. increases in vehicle usage) and embodied (e.g. from road and other transport infrastructure construction). • Water – (increases in demand, emissions from new infrastructure) • Aviation – (for example from airport or passenger number expansion).

³ zu Ermgassen, S. O. S. E., Drewniok, M. P., Bull, J. W., Corlet Walker, C. M., Mancini, M., Ryan-Collins, J., & Cabrera Serrenho, A. (2022). A home for all within planetary boundaries: Pathways for meeting England’s housing needs without transgressing national climate and biodiversity goals. *Ecological Economics*, 107562. <https://doi.org/10.1016/j.ecolecon.2022.107562>

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>Available models</p> <p>In addition to some examples of carbon emission assessments being made specific planning proposals, we are aware of two serious attempts to model likely carbon emissions arising from planning proposals at the level of local or supra-local plans.</p> <p>1) The Greater Cambridge spatial plan: this modelled the different levels of carbon emissions from alternative spatial models, helping Cambridge to select the most appropriate spatial option⁴.</p> <p>2) Greater Manchester. Community-based groups, working together, made their own estimates of the likely carbon impact of the 9-district Joint Plan, Places for Everyone⁵.</p> <p>Other examples include West Yorkshire, Leeds and Plymouth and South Devon’s Local Plan.</p> <p>In addition, there is a large body of primary literature that can inform such estimates. The Greater Manchester report utilises and cites many of them from academic, professional and industry sources.</p> <p>Commentary</p> <p>Both the above examples were evidence-based and sensitive to likely policy impacts (e.g. transport decarbonisation, changes</p>

⁴ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/gclp-strategic-spatial-options-assessment-implications-for-carbon-emissions-nov2020.pdf>

⁵ <https://steadystatemanchester.files.wordpress.com/2023/01/p4e-carbon-impact-report-draft-v4.0.pdf>

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>to building regulations).</p> <p>The Cambridge assessment formed part of the assessments made by the authority in making the plan. It included alternative policy scenarios. The Greater Manchester example, included some sectors additional to those considered by Cambridge (including land use change emissions and aviation emissions). It made comparison with the emissions permissible within the Tyndall advised carbon budget adopted by Greater Manchester Combined Authority (GMCA)⁶. In the Planning Inspectorate hearings on the plan, GMCA argued that carbon emission calculations and estimates were not legally required. It regarded the Cambridge example as an outlier whereas community groups argued that it was an example of best practice. It is rather difficult to see how definitive statements could be made on the likely carbon impact of a plan without making the necessary calculations and estimates⁷.</p> <p>Conclusion</p> <p>The Cambridge and Greater Manchester examples together demonstrate the feasibility of proportionately conducting effective high level carbon impact assessments that would incorporate all measurable carbon demand created from</p>

⁶ https://pure.manchester.ac.uk/ws/portalfiles/portal/83000155/Tyndall_Quantifying_Paris_for_Manchester_Report_FINAL_PUBLISHED_rev1.pdf

⁷ A workbook has been produced as an introductory guide on carbon calculations for community groups <https://steadystatemanchester.net/publications/the-carbon-and-planning-workbook/>

Q no.	Consultation Question	Y/N/ other	Suggested response
			plan-making and planning decisions. We propose that a standard method be recommended, based on this and other appropriate work and that all building development should include a carbon assessment in their planning applications. The NPPF could establish some guidelines for carbon emissions in developments, above which developments may be prohibited.
40	Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?	Y	There could be a requirement that all development over say 10 housing units in scale, incorporate at least two 'nature based solutions', while local plans should have a section specifically on the implementation of such innovations at scale, together with a funding model that used (inter alia) developer levies. Nature based solutions of multi-functional benefit ought to be a stated policy preference. New development must be planned to be adapted to climate change and not add to the burden of resilience of areas lower down the water catchment area as a consequence.
41	Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?	Y	
42	Do you agree with the changes proposed to Paragraph 158 of the	Y	There is an urgent need to decarbonise our energy supply to ensure future energy security whilst safeguarding our

Q no.	Consultation Question	Y/N/ other	Suggested response
	existing National Planning Policy Framework?		environment. Community energy initiatives have been hampered by the planning and financial context. The case of Denmark gives an idea of the potential scale of such local initiatives and their positive impact on energy security and community prosperity. There may be more support if communities directly benefit from such developments on their landscape. Could there be any guidance on how to ensure communities directly benefit from such proposals.
43	Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?	?	These footnote references appear to be incorrect so it is impossible to understand exactly what is being proposed. However, we suggest a "presumption for low energy demand and encouragement of renewable energy generation" is written into the new NPPF.
44	Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?	Y	Strongly support this.
45	Do you agree with the proposed	N	The timetable means that current poor practice will continue

Q no.	Consultation Question	Y/N/ other	Suggested response
	<p>timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?</p>		<p>and the benefits of these changes will not be introduced in many local plans until they are refreshed. We suggest that the new arrangements are introduced more rapidly - so the submission deadline for 'old-style' plans should be no later than 31 December, 2023. Once the outcome of this consultation is known, instructions should be issued with specific guidance about what should be considered in plans that are currently in existence and in those that are currently under development.</p>
46	<p>Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?</p>	N	<p>It is important that the changes set out in this consultation are implemented as early as possible. Therefore, all Authorities should be asked to review their existing Plans against the agreed new requirements and propose early amendments (or a new Plan) to bring them into line with the revised guidance. An achievable but early deadline should be set at one year.</p>
47	<p>Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?</p>	N	<p>The same principle should apply to neighbourhood plans as for local plans (see previous answer). However, given the role of voluntary citizen actors in their production and revision, a more generous two year time frame should be set for their revision and completion. Neighbourhood Plans are only one vehicle for communities coming together and the NPPF should require authorities to</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			work with community groups of different kinds.
48	Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?	Other	<p>Broadly yes. The use of SPD's is uneven across authorities yet they had the potential to strengthen local policy and make it locally responsive. So the proposal to give this facility an equivalent status to that of Local Plans is welcome, so long as their agreement is not subject to yet more hoops for councils to jump through.</p> <p>Some of the SPDs may relate to issues that are specifically updated following this consultation. Guidance should be published to confirm SPDs that relate to those specific topic areas should be reviewed and, where necessary, updated within 12 months of the guidance being issued.</p>
49	Do you agree with the suggested scope and principles for guiding National Development Management Policies?	Y	It seems appropriate to reduce the repetition of national policy in Local Plans and to do this by making those policies, such as the Climate Change Act, clearly effective at local authority level.
50	What other principles, if any, do you believe should inform the scope of National Development Management Policies?	Other	We note that NDMPs must set very high social and ecological principles. They must not be a drag on locally agreed policies that seek to exceed them on these dimensions, for example in terms of carbon reduction, biodiversity protection and enhancement and the social mandate in housing provision. If this is not to be a “power grab” by central government, but a support to the higher planning standards and local democracy,

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>then the policies will need careful drafting according to these principles. With those considerations in mind we suggest the following principles should be incorporated.</p> <ol style="list-style-type: none"> 1) The precautionary principle. 2) The principle of the primacy of ecological protection (there is no development on a dead planet). 3) NDMPs should include a clear definition of the term "sustainable development" (to ensure it is not weakened, for example to just relate to the materials that are used in construction, or to tokenistic tree planting). The policies should explicitly define and prevent greenwashing in planning and development management. 4) National Highways considerations should also be included, incorporating the understanding that new roads are not a sustainable form of travel and that there are aims to reduce the level of traffic. The NDMPs should therefore include a policy which requires sustainable freight and passenger transport options to be provided in particular circumstances (ie when a certain volume of HGVs or potential passengers is, or will be, reached) before additional development is complete.
51	Do you agree that selective additions should be considered for proposals to complement existing	Y	<p>We support these sensible proposals. Carbon reduction requirements should be an explicit NDMP. This should ensure that developments are truly sustainable.</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
	national policies for guiding decisions?		<p>With reference to Allotments, they could be included in the designation of Local Green Space, as set out in the current NPPF policies 101, 102 and 103.</p> <p>Regarding brownfield, we agree that this could be set out in an NDMP but if so, the policy must be explicit that available brownfield sites should be developed prior to any consideration of green space, both Green Belt and Urban Green Space (unless there are overriding considerations, e.g. high levels of toxins that cannot be remediated fully, or established alternative amenity usage). This is likely to require further funding to bring brownfield sites back into use.</p>
52	Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?	Y	<p>Minimisation of intrusive advertising, by limitation on billboard size (smaller for self-illuminated or digital boards) and the setting of low energy limits for electrified billboards.</p> <p>It is not just advertising boards whose illumination blights communities and wildlife, but all sorts of illuminated and flashing signs outside trading premises. These should rarely be permitted and the presumption should be in favour of local community views.</p> <p>Standards for SUDS management, including the mandatory inclusion of rain gardens in all new developments above a certain (smallish) size, to minimise run-off and watercourse pollution.</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>The principle of adequately supporting and funding public participation must be adopted in the NPPF. The Framework should also provide mandatory guidance to be followed by LAs about what makes an effective consultation. This should include pre-plan community involvement, with adequate support. Too often consultation is on what appear to be “done deals” and is conducted with poor methodology. The Gunning principles should be followed in the guidance.</p>
53	<p>What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?</p>	Other	<p>The Missions need to be updated for the following:</p> <ul style="list-style-type: none"> - There is no Mission to increase citizen involvement in decision-making, including in planning. - The Transport Infrastructure Mission (3) is focussed on public transport, which is good but there is no emphasis on sustainable freight transport options. The number of HGVs on local and national highways is a huge issue, not just for congestion and carbon emissions but also for air, noise and carbon pollution. - The Housing Mission (10) does not commit to ensuring everyone has a safe, affordable home (even if it is one they do not own themselves). <p>To support achievement of the Missions, the Government should facilitate an effective social infrastructure, for example,</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>the appointment of paid Independent Citizens' Advocates, at every level of Government, to advise, train and support residents throughout the planning process.</p> <p>In planning policy terms, the following actions will help to achieve the Missions:</p> <ul style="list-style-type: none"> - The Treasury should be encouraged to change tax laws to make development on brownfield sites tax-light and development on greenfield sites tax-heavy. - It should be clear within the NPPF how other Strategies must be applied in the NPPF.
54	How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?	Other	We strongly oppose the uncritical and evidence-free promotion of both economic growth (which produces ecological and climate damage and well as, in the UK at least, increasing inequality) and productivity (which displaces labour and causes unacceptable levels of wealth concentration). Instead government policy should focus on actual deliverables including equitable prosperity, ecological, economic and social security, and the promotion of convivial, liveable patterns of living.
55	Do you think that the government could go further in national policy, to increase development on	Y/Other	<p>Broadly we support a "brownfields first" policy. However, there are caveats.</p> <p>1) Dense city centres should be protected from excessive</p>

Q no.	Consultation Question	Y/N/ other	Suggested response
	brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?		<p>population concentration and high rise buildings in order to prevent the creation of heat islands and unacceptably crowded settlements. Moreover, the carbon costs of buildings per unit of floor space, rise in proportion to their height.</p> <p>2) Sites that have reverted to nature, by the natural process of colonisation, should be protected where they provide a valued community amenity or ecosystem services.</p> <p>3) The utilisation of brownfields for uses such as housing and schooling requires careful assessment, especially in post-industrial sites that may have considerable levels of toxins and other hazards. Government financial support will be needed to incentivise their use.</p> <p>The NPPF could require that sites that have become brownfield through disuse over more than two years should be confiscated and developed in partnership with community groups.</p>
56	Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example	Y	It is not just a matter of people feeling safe but also of actually being safe. This is fundamentally a societal problem that can be addressed in an integrated way via government policy including public education campaigns on the rights of women, girls, disabled people, ethnic minorities and others who disproportionately are victims of street crime, and measures to reduce poverty and income inequality, which have been shown to be related to both crime levels and perceptions of trust and

Q no.	Consultation Question	Y/N/ other	Suggested response
	policies on lighting/street lighting?		<p>public safety.</p> <p>Adequate lighting can contribute to public safety. However, street lighting should use movement-sensitive switching or similar technology to both minimise energy consumption and light pollution while achieving acceptable levels of street safety. We also note considerable evidence that reduced levels of street lighting have not impacted on street safety, as measured by reported crime⁸.</p>
57	Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?	Y	<p>Please refer to our detailed and evidenced answer to question 39 with respect to the environmental assessment and carbon emissions.</p> <p>We support the new emphasis on community involvement, and there are some excellent examples of this from outside the formal planning sector, for example the work of Just Space in London. We make three important points about this.</p> <p>1) Communities should be involved at the stage of plan making, not just as consultees on already formed plans but, critically, at the point of plan formation. That is to say that citizens should be enabled to make a contribution to the process of designing plans from the start – and their views should be taken into account.</p> <p>2) If communities are to have a greater say, then the process</p>

⁸ School of Hygiene and tropical Medicine, 2015; CPRE, 2014.

Q no.	Consultation Question	Y/N/ other	Suggested response
			<p>needs to be resourced properly, with dedicated community development planning officers, who would be mandated to take a stance independent from the council. These resources should be resourced centrally so as to ensure independence.</p> <p>3) Proper support to community involvement will also require the skilled and sensitive handling of differences of opinion and interest across the community.</p> <p>The Government has implemented a "Green Claims Code", which requires businesses to substantiate their claims that a product, service, brand or business provides a benefit or is less harmful to the environment. It seems that this "Code" does not apply to the public sector. This should be extended to all sectors, or an equivalent standard introduced. Careful guidance needs to be issued in order to ensure any such claims have a genuine impact and, for example, do not include offsetting proposals that could be seen as 'greenwashing'.</p>

Steady State Manchester
steadystatemanchester@gmail.com
<https://steadystatemanchester.net>