

# National Planning Policy Framework

## Consultation questions

We are seeking your views on the following questions on the Government's proposal for a new National Planning Policy Framework.<sup>1</sup>

Email responses to: [planningframework@communities.gsi.gov.uk](mailto:planningframework@communities.gsi.gov.uk)

Written responses to:

Alan C Scott

National Planning Policy Framework

Department for Communities and Local Government

Zone 1/H6, Eland House,

Bressenden Place

London

SW1E 5DU

### (a) About you

#### (i) Your details

Name:	Cllr Tony Cummings
Position:	Chair of Planning Control Committee
Name of organisation (if applicable):	Bury Council
Address:	Town Hall, Knowsley Street, Bury BL9 0SW
Email Address:	j.cummins@bury.gov.uk
Telephone number:	0161 253 6089

**(ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?**

Organisational response

Personal views

**(iii) Are your views expressed on this consultation in connection with your membership or support of any group? If yes please state name of group.**

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<sup>1</sup> (see: <http://www.communities.gov.uk/publications/planningandbuilding/draftframeworkconsultation>)

Yes

No

Name of group:

**Planning Control Committee of Bury Council**

**(iv) Please tick the *one* box which best describes you or your organisation:**

Private developer or house builder

Housing association or RSL

Land owner

Voluntary sector or charitable organisation

Business, consultant, professional advisor

National representative body

Professional body

Parish council

Local government (i.e. district, borough, county, unitary, etc.)

Other public body (please state)

Other (please state)

**(v) Would you be happy for us to contact you again in relation to this consultation?**

Yes

No

DCLG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that as a public body, the Department is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data - name and e-mail address - you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the comments box.

## (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?

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

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

**Paras 13/14 - The presumption in favour as it is currently worded skews the balance heavily in favour of economic considerations at all costs which will result in “overleverage” by borrowing from assets of future generations and goes against the Brundtland definition of sustainable development. Instead the emphasis should be on achieving integrated outcomes that balance the various economic, social and environmental considerations. In addition the presumption fails to recognise that some areas are inherently more sustainable and have different needs than others, for example cities and their surrounding hinterlands (regions).**

**Cities are important and are the engines of national growth and enterprise and provide the dense agglomeration of people and activities that for millennia have created the sparks that have fuelled human innovation and enhancement. The price of this, if unmanaged is congestion, air and water pollution, carbon emissions and public health concerns. Planning within this context provides the framework for managing change and growth in the pursuit of sustainable development.**

**If the Government are intending to maintain the presumption In favour of sustainable development, then an attempt must be made to define ‘sustainable development’, as there is scope for local authorities and developers to hold differing interpretations which can only mean that time will be unnecessarily wasted at appeals to clarify this matter.**

**Para 14 and 19 - With only 30% of authorities having adopted core strategies and with ours being 2 years away we potentially will be left in a vacuum where the default answer would be 'yes' under the draft NPPF. This effectively removes the 'local' decision making element from the process on any planning application involving new development.**

## **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?

- |                           |                                     |
|---------------------------|-------------------------------------|
| 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"/>            |

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

**Para 21 – The last sentence on Supplementary Planning Documents is considered to be severely restrictive and unnecessarily weighted towards improving the profit margins of developers. Whilst the need for economic growth is recognised, the wording of this policy does not take into account the role of supplementary guidance in adding value and clarity to the policies contained within local plans and their importance in securing crucial gains in other areas of planning policy such as requirements for open space, sport and recreation as part of housing developments. SPDs are a vital element of the planning service offered in Bury and it is believed it is possible that their existence can realise sustainable development objectives without placing a 'financial burden' on developers.**

**It is not clear from this paragraph whether there will be an alternative mechanism in place for SPDs in advance of adopting a charging schedule for the Community Infrastructure Levy and therefore further clarity is required.**

**Para 39 – It is also not clear here what an 'acceptable**

**return' to a willing landowner/developer would be. Although it is accepted that the Government would not be able to define this nationally, its inclusion is likely to generate considerable debate over viability and we therefore support proposals to set up a working group with local authorities on how we satisfy the new requirements.**

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

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

### **Decision taking**

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

3(a) Do you agree

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

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

**Para 54 - There are many internal inconsistencies within the NPPF, which on one hand seeks to reduce guidance to**

**enable greater freedom and flexibility but on the other is forensically prescriptive in directing what local authorities should do.**

**The reference to local planning authorities needing to “attach significant weight to the benefits of economic and housing growth” is inappropriate, as it effectively downgrades the importance of other policy objectives such as those relating to social and environmental issues. It is therefore inconsistent with an approach that purports to be based on sustainable development, instead prioritising some issues over others rather than seeking to optimise the ‘triple bottom line’ - the economic, social and environmental aspects of sustainability.**

**Para 56-58 - Pre-Applications. We welcome all pre-application discussions but there is a concern that as the proposed local fees regulations will not allow cost recovery for this activity from the fees for applications. As such this service would either have to be charged for or subsidised by the Council, both of which would restrict its availability.**

**Para 59 - The Framework is correct in emphasising that the right information is crucial to good decision making. The presumption in favour of sustainable development effectively means that a proposal should be approved unless there is clear evidence that the adverse impacts would significantly outweigh the benefits, and so it is in the applicant’s interest to reduce the amount of evidence that is submitted so that the potential for adverse impacts to be identified is minimised. It would be inappropriate to require local planning authorities to commission any additional research to assess the impacts of development proposals, as they do not have the financial resources and this should be the responsibility of the applicant. Therefore, it is essential that applicants submit all appropriate information and so the Framework should clearly set out that applications that are not accompanied by the necessary information should not be validated or should be refused.**

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

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

**No comments.**

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

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

**Para 75 - During 2010/ 2011 period planning authorities within Greater Manchester approved 93% of major planning applications.**

**One of the biggest potential constraints on economic growth is the availability of suitable land and premises for economic development. It is therefore important that existing sites and buildings that could still have a positive employment use are not lost unnecessarily to other uses such as housing. Paragraph 75 should be amended to reflect this, emphasising the importance of taking into account market signals when determining whether it is appropriate to permit the redevelopment of employment sites and buildings for other uses. Without this amendment, active employment uses could be forced out**

**by uses with higher land values, resulting in a loss of local jobs. The current wording of paragraph 75 could be read as meaning that employment land should not be protected at all.**

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?

**No comments**

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

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

**No comments**

## **Transport**

The policy on planning for transport takes the right approach.

7(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"/>            |

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

**No comments**

### **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)

**No comments**

### **Minerals**

The policies on minerals planning adopt the right approach.

9(a) Do you agree?

Strongly Agree

Agree

Neither Agree or Disagree

Disagree

Strongly Disagree

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

**No comments**

## 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)

**Para 110 - During the 2010 / 2011 period, planning authorities in Greater Manchester approved 88% of planning applications for major residential developments.**

**A difficulty with the approach in the Framework is that there will be no guarantee that the permitted residential developments will actually be completed within the following five years. Consequently, the lack of a five year supply may be the only reason why they are permitted but they may actually do nothing to address the perceived problem. Instead, developers would be able to bank the approved sites, or make a technical start on site but not complete any dwellings in order to preserve the permission in the long-term. If it is considered appropriate for the Framework to place a significant emphasis on the five year supply, then it should require that conditions and/or obligations are used to ensure that the dwellings approved as a result are actually delivered within a reasonable timescale.**

**The presumption in favour of making efficient use of land and the national brownfield target of 60% from PPS3 has not been carried forward by the draft NPPF. This is regrettable as the regional tier is set to be removed, under which the North West of England Plan sets a target of at least 80%, reflecting the vast amount of undeveloped brownfield there is available (there were 7,400 hectares of vacant and derelict land recorded in the North West in the 2009 National Land Use Database – the largest of any region in England). It is therefore considered crucial that this approach remains in place at the national level.**



## 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)

**No comments**

## Design

The policy on planning and design is appropriate and useful.

12(a) Do you agree?

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

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

**Para 121 - The standard "obviously poor design" - was in the old PPG1 and the weakness of this statement was recognised through PPS1 and subsequent design rhetoric - CAGE, Places Matter, Design Guides etc etc. Why return to the poor wording?**

**This has ramifications for the ways in which officers negotiate with developers over planning applications as there is little scope for securing improvements to a scheme. Bury's achievements in delivering successful town centre regeneration projects has recently been recognised as the Council and URBED were announced as the 'Overall Winner' of the 2011 RTPI North West Planning**

**Achievement Award for their work in delivering projects through the 'Bury But Better' masterplan. Much of this success has emerged through having regular meetings to negotiate with developers or through planning obligations which secure critical elements of infrastructure. It is considered that this impetus, and the overall drive for good planning, is lost by the wording of Para 121 and should be amended.**

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

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

**Para 139 - The NPPF should make it clear that local planning authorities should actively consider reviewing their Green Belt boundaries if this would enable more sustainable patterns of development to be delivered. There is a risk that a very rigid approach to Green Belt boundaries will result in development being directed towards less sustainable locations, which could harm the achievement of economic, social and environmental objectives.**

**Para 143 – Although unchanged, it is considered that the presumption in favour of sustainable development and its weight in favour of economic growth will be often used to demonstrate 'very special circumstances' for inappropriate development in the Green Belt. This is unacceptable and contradicts Green Belt objectives.**

**Para 144 – The amendments made to this area of Green Belt policy, although minor, give cause for concern as they are likely to give rise to unacceptable impacts which could harm the openness of the Green Belt. The change from 'essential facilities' to 'appropriate facilities' in the second bullet point will encourage schemes which introduce**

**inappropriate elements into schemes for outdoor sport/recreation such as function rooms which we will be powerless to prevent under the new presumption in favour of sustainable development. The final bullet point relaxes controls over the development of brownfield sites in the Green Belt and it is believed that this will erode the wider aims of Green Belt policy, particularly the five purposes in Para 134.**

### **Climate change, flooding and coastal change**

The policy relating to climate change takes the right approach.

14(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"/>            |

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

**No comments**

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

14(c) 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"/>            |

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

**No comments.**

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

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

**No comments.**

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

14(g) 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"/>            |

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

**No comments.**

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

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

**As referred to earlier, it is believed the presumption at Para 14 promotes economic considerations above those relating to environmental concerns. Therefore the framework within this section is compromised.**

**Para 165 - It is recognised from recent announcements that the Government intended the line 'Plans should allocate land with the least environmental or amenity value where practical' to operate as a brownfield-first policy, although it is considered that this is not made clear enough, particularly as it does not use the familiar term 'brownfield'. It is suggested that this reference would also be better included within a section other than 'Natural Environment' as this has added to the confusion.**

**Para 167 – the reference both here and within this section to the protection of designated assets is welcomed, although it is believed that more emphasis could be made to the proactive approach of locating green infrastructure as a regeneration tool i.e. as a means for directing where new development could be located. Planning can encourage active lifestyles by providing attractive environments to walk, cycle and relax in and can encourage species recovery by working towards the linking of sites.**

## 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)

**PPS5 makes a clear statement that heritage assets are a non-renewable resource. This key concept, which underpins the way in which we preserve and record heritage assets, has been omitted from NPPF and should be included.**

**In particular, it is not clear to us how a decision-maker would resolve this strong presumption with the heritage key phrases in para's 183 and 184: 'considerable weight should be given to [designated heritage asset] conservation'; 'any harm or loss should require clear and convincing justification'; 'substantial harm.....should be wholly exceptional'; and 'substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss'.**

**In short, under the heritage section public benefits have to demonstrably outweigh the harm, whereas under para 14 the harm has to 'significantly and demonstrably' outweigh the benefits. This internal conflict needs resolution. It is a particular concern for less than substantial harm.**

## Impact assessment

The Framework is also accompanied by an impact assessment. There are more detailed questions on the assessment that you may wish to answer to help us collect further evidence to inform our final assessment. If you do not wish to answer the detailed questions, you may provide general comments on the assessment in response to the following question:

17a. Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?

**No comments**

## 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?

**No comments**

## Specific questions on the impact assessment

QA1: We welcome views on this Impact Assessment and the assumptions/estimates contained within it about the impact of the National Planning Policy Framework on economic, environmental and social outcomes. More detailed questions follow throughout the document.

**No comments**

QA2: Are there any broad categories of costs or benefits that have not been included here and which may arise from the consolidation brought about by the National Planning Policy Framework?

**No comments**

QA3: Are the assumptions and estimates regarding wage rates and time spent familiarising with the National Planning Policy Framework reasonable? Can you provide evidence of the number of agents affected?

**No comments**

QA4: Can you provide further evidence to inform our assumptions regarding wage rates and likely time savings from consolidated national policy?

**No comments**

QA5: What behavioural impact do you expect on the number of applications and appeals?

**None**

QA6: What do you think the impact will be on the above costs to applicants?

**Potential increase in costs as any new system always creates uncertainty which in turn leads to legal challenges.**

QA7: Do you have views on any other risks or wider benefits of the proposal to consolidate national policy?

**No comments**

QB1.1: What impact do you think the presumption will have on:

- (i) the number of planning applications;
- (ii) the approval rate; and
- (iii) the speed of decision-making?

**i. None. ii. None, iii) slower as legal determinations on new policy will take time to work through the system.**

QB1.2: What impact, if any, do you think the presumption will have on:  
(i) the overall costs of plan production incurred by local planning authorities?  
(ii) engagement by business?  
(iii) the number and type of neighbourhood plans produced?

**No comments**

QB1.3: What impact do you think the presumption in favour of sustainable development will have on the balance between economic, environmental and social outcomes?

**None**

QB1.4: What impact, if any, do you think the presumption will have on the number of planning appeals?

**No comments**

QB2.1: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

**No comments**

QB2.2: Is 10 years the right time horizon for assessing impacts?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

**No comments**

QB2.3: How much resource would it cost to develop an evidence base and adopt a local parking standards policy?

**No comments**

QB2.4: As a local council, at what level will you set your local parking standards, compared with the current national standards?

Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

**We currently have an SPD which was subject to consultation and the intention is to retain that as a basis for decision making and as such there will be no impact on costs.**

QB2.5: Do you think the impact assessment presents a fair representation of the costs and benefits of the policy changes on minerals?

**No comments.**

QB3.1: What impact do you think removing the national target for brownfield development will have on the housing land supply in your area? Are you minded to change your approach?

**The majority of land in our area currently planned for development is brownfield. The removal of targets will encourage developers to look at developing 'cheaper' green field sites which could impact on both sustainability issues and the openness and character of the borough.**

QB3.2: Will the requirement to identify 20% additional land for housing be achievable? And what additional resources will be incurred to identify it? Will this requirement help the delivery of homes?

**No comments.**

QB3.3: Will you change your local affordable housing threshold in the light of the changes proposed? How?

**No comments.**

QB3.4: Will you change your approach to the delivery of affordable housing in rural areas in light of the proposed changes?

**No comments.**

QB3.5: How much resource would it cost local councils to develop an evidence base and adopt a community facilities policy?

**No comments.**

QB3.6: How much resource would it cost developers to develop an evidence base to justify loss of the building or development previously used by community facilities?

**No comments.**

QB3.7: Do you think the impact assessment presents a fair representation of the costs and benefits of the Green Belt policies set out in the Framework?

**No comments.**

QB4.1: What are the resource implications of the new approach to green infrastructure?

**No comments.**

QB4.2: What impact will the Local Green Space designation policy have, and is the policy's intention sufficiently clearly defined?

**No comments.**

QB4.3: Are there resource implications from the clarification that wildlife sites should be given the same protection as European sites?

**No comments.**

QB4.4: How will your approach to decentralised energy change as a result of this policy change?

**No comments.**

QB4.5 Will your approach to renewable energy change as a result of this policy?

**No, we already encourage renewable energy.**

QB4.6: Will your approach to monitoring the impact of planning and development on the historic environment change as a result of the removal of this policy?

**No, we already do this but the weakening of statutory responsibilities may affect the allocation of a high priority to this area of work.**