

# City of York Council

## Response to Proposed Reforms to the National Planning Policy Framework and other changes to the Planning System Consultation (December 2025)

### Consultation Introduction

#### 1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?

The changes within the NPPF are more clear and it is also explicit that policies should not be repeated in Local Plans. This is helpful but also allows for Local Plans to determine policy locally, which we think is positive. We wouldn't want NDMPs to remove the ability for LPAs to set locally specific policy where appropriate. Also, we would welcome a period of stability for plan-making and decision-making to allow all the new systems/NPPF to embed and be monitored for their effectiveness.

#### 2) Do you agree with the new format and structure of the NPPF which comprises separate plan-making policies and national decision-making policies?

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Yes, but decision-making and plan-making policies could be differentiated in their names/ descriptions more clearly, either within the policy numbers, or completely separating the document into two parts (i.e. all the plan-making policies, and then all the NDMPs). Currently policy names overlap with a lot of Local Plan policy referencing; this will get confusing as we report.

We will also consistently be referring to long para number e.g. 'NPPF PM1 part 1a' whereas previously, it would have one paragraph number.

#### 3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework?

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

It is helpful to have the annexes included for ease. Elsewhere in our response we may comment on the content of these annexes.

#### **4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Provides clarity and consistency with other planning policy ensuring that planning policy impacting Gypsy and Traveller communities is clearly to be considered with the same weight as other policy in the NPPF.

## **Chapter 1: Introduction**

#### **5) Do you agree with the proposed approach to simplifying the terminology in the NPPF where weight is intended to be applied?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Whilst we welcome consistent terminology, simplification of policies often (if not always) leads them open to a higher degree of interpretation (or misinterpretation). Policies should be phrased to minimise this and the risk of ambiguity to make all

stages of the planning process clearer, quicker and less resource intensive – we must be aware ‘unintended consequences’ that may result otherwise.

## Chapter 2: Plan-making policies

### 6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

We understand the purpose of SDS and its strategic overarching role in the planning system. It would be helpful to embed in PM1 the need to work with constituent LPAs on identifying strategic priorities to ensure alignment from the top down to take account of strategic policy that may already be embedded in adopted Local Plans.

### 7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area?

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?

It would be better for the SDS to maintain a longer timeline and strategic overview to provide a consistent policy basis against which LPAs can develop their plans. A shorter 5 year cycle may not allow for local plan making to reach conclusion and could create uncertainty or inertia. It would be more helpful for local monitoring of Local Plans to influence and trigger a review of housing as part of their own 5 year cycle.

**8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

We need to ensure the approach taken allows for consistency and reflects the planning regime that has been examined and is in place, particularly where the housing numbers have been accepted through examination and may be lower/higher compared to the standard method. This needs to be a material consideration in 5 yr housing land supply matters. The examined targets should not be undermined and any agreed housing target in adopted plans should be used for the duration of that plan for 5 year housing land supply purposes.

We have reservations regarding the approach to the standard method and should this be revised over the course of time whereby you intend for them to inform 5 yr HLS, there needs to be appropriate transitional arrangements whereby planning authorities can respond in a timely manner without undermining the plan-led process or adopted housing figure agreed via examination.

It should continue to be noted that whilst LPAs can determine permission and monitor completions for housing development, we have very limited influence/capability to speed up delivery; this is with the developer.

**9) Do you agree with the role, purpose and content of local plans set out in policy PM2?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Whilst many aspects of the policy are clear in relation to expectations, we have concerns with policy PM2 regarding its site specific requirements. Local Plans cannot be reasonably expected to identify all the contributions expected from development from a strategic assessment of the site, particularly on and off-site infrastructure, which may also change prior to submission of an application. It is often the case that the precise requirements will not be known/agreed until a detailed planning application is submitted. For example, although a high level forecast of impacts of a local plan on the highways network can be modelled, the key detailed information, such as development trip rates and distributions and hence impacts on the network (particularly junctions) and measures to encourage active travel, will not be fully known until a detailed transport assessment and travel plan have been submitted as part of a planning application. If this policy is applied strictly, LPAs will have to undertake significant additional work in preparing a local plan to provide more accurate assessments of the infrastructure requirements of various (allocated) sites, prior to submission for examination and may require an evidence base that is unreasonable. This will affect the timetable for progressing Local Plans and may lead to delay whilst the required evidence is developed and inevitably agreed with the landowner. We want to avoid a situation whereby PM2 Part 4 Secretary of State intervention is engaged!

**10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan?**

Yes

No

a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.

**11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Whilst we welcome the removal of duplication to aid consistency in decision-making, this approach may preclude the inclusion of justifiable policies that exceed the limitations set out in national decision-making policies within local plans. We would advocate an approach that, where justified and viable, policies should promote ambitious targets at the local level and allow this modification to exist.

We welcome the inclusion of digital formatting (PM6 1f) to aid transparency and accessibility in presentation of plans. It would be helpful to ensure that resources to support this implementation are readily available for LPAs.

**12) Do you agree with the approach to initiating plan-making in PM7?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

It is helpful to have standardised tools, methods and templates to ensure that the process followed is consistent and proportionate to expectations. We also welcome that evidence established early should only be revised where there are strong reasons to do so as this will minimise arguments and a volume of updates later in the process.

However, there appear to be conflicts between the expectations of this policy and other policies (e.g. PM12 in regard to the amount of evidence that might be required to inform local plan site allocations). Whether evidence is proportionate and robust to support the policy approach will be key challenges through the gateway assessment stage and examination.

**14) Do you agree with the approach to identifying land for development in PM9?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree.

This is missing key criteria to ensure that 'sustainable' sites are to be selected. This policy must allow local level understanding of suitability to include relevant criteria to reflect the locality identifying sites.

**15) Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree.

Further guidance is necessary to ensure LPAs can sufficiently justify and demonstrate the approach taken. This needs to align with examination expectations to ensure this does not halt/delay/cause significant issue at the gateway/ examination stage.

**16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree.

Whilst we welcome the clarity that setting out infrastructure provision more explicitly may provide, we need to be able to reflect price and need at the point of application; this may have changed since plan preparation. Also, much land will

have been purchases/have options prior to Local Plan allocation; this is sometimes commercially sensitive and a point of contention through applications/ viability assessment, particularly if the landowner has paid more for the land than our understanding of value.

We are also concerned that including in the Local Plan circumstances in which review mechanisms might be used increases uncertainty and ability to challenge the plan/ outcomes relevant at decision-making stage.

**17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

These should be set in national policy and should be limited to the most exceptional circumstances given the level of viability assessment which will already have been undertaken to support the Local Plan. This will reduce ability for argument through examination and at the decision-making stage when being applied.

**18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Building regulations in some parts are no longer contemporary (e.g. standard parking bay dimensions of 4.8m x 2.4m has not kept pace with the increase in the size of cars since the 1970s) and are thus deficient. Therefore, setting quantitative (and qualitative) standards in local plans (or supplementary plans) covering matters that are already addressed by Building Regulations should be allowed where building regulations are known to not be contemporaneous, thus deficient.

If relying on building regulations, these need more regular review to keep pace with standards.

Consideration should be given to providing national standards for accessible development to avoid each LPA demonstrating separately their approach when there is clearly a need in general for accessible and adaptable homes.

**19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?

We consider that the 'Appropriate' needs further definition; this is subjective based on topic based interest to the plan. This will be the key test through examination that is likely to generate most comment.

**20) Do you have any specific comments on the content of the plan making chapter which are not already captured by the other questions in this section?**

Answer

PM16 1a states that that *the local authority has reached a reasonable conclusion that the sites involved are nearby to each other*. It would be helpful to acknowledge that sites may not be 'near to each other' but be identified for the same type of use across the authority. E.g. if a supplementary plan for gypsy and traveller provision, it may be authority wide but cover the same type of allocations.

### **Chapter 3: Decision-making policies**

**21) Do you agree with the principles set out in policy DM1?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

We welcome promotion of early engagement and pre-application engagement. However, input from statutory consultees and other organisations should not be considered less necessary for 'other types of development' when seeking the minimum necessary information requirements. Minimum requirements may be interpreted differently depending on viewpoint but it is necessary to ensure the level of information leads to quality of development not just quantum of development.

**22) Do you agree with the policy DM2 on information requirements for planning applications?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Annex C does not allow for the submission of additional documents such as swept path analyses, so flexibility should be afforded to LPAs to request these (in validation lists as/if necessary). Information requirements need to ensure that it leads to quality applications and development proposals.

**23) Do you have any views on whether such a policy could be better implemented through regulations?**

Answer

**24) Do you agree with the principles set out in DM3?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Criterion d. - Who is the arbiter of the necessity for local authorities to consult with statutory consultees? Failure to consult can result in erroneous decisions (to approve or refuse) being made. Furthermore, consultees will require substantial additional resourcing to ensure they respond within the statutory

deadlines, particularly for large and complex applications. It should not be forgotten that this adds quality to decision-making.

Criterion f – Views on compliance with local plan policies, the framework and other material considerations can differ substantially between the main parties involved - the applicant and the local planning authority. The former will try to assert that an application is in full accord with the local plan, etc., whereas the local planning authority will test this assertion and refuse it, if it considers it isn't. Local Planning Authorities should still retain the right to do this, if it clearly believes an application to be non-compliant. The current planning system still allows an applicant to appeal a refused application, and this should remain as the appropriate course of action following refusal

**25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

This policy needs to work implicitly with new provisions in PM12. There will be differences and push back between plan-making and decision-making in relation to viability.

Part 2d is likely to be utilised frequently given the volatility of the economy over recent years – LP viability work could be 3 years old at the point of adoption and up to 8 years old when the plan is still being used. Consideration needs to be given how this works with PM12 and where the balance lies.

Part 2c is likely to be a point of disagreement between developers and the local authority – there is a matter of judgement involved as to what might be determined to be an unforeseeable cost.

Part 3 needs consideration against PM12. This is often a point of contention that informs site specific viab

**26) Do you have any further comments on the likely impact of policy DM5: Development viability?**

Answer

We note that the scope of the issues around viability are highly technical, particularly those related to BLV and EUV and beyond the technical expertise of most planners. These would be issues we would normally employ a consultant to address but do not have the resources to do this to respond to a consultation; consequently, we don't feel able to fully respond on matters of viability or have clarity as to the full implications.

Para. 2 implies that affordable housing and infrastructure take priority in determining which policies are to be complied with if scheme viability is in doubt, at the expense of other valid policies.

Para. 2d - The current (and possibly medium-to-long-term) global geopolitical situation will invariably lead to economic circumstances changing from the time any development plan was prepared, unless sufficient headroom has been provided for in viability assessments undertaken for development plans. This is likely to lead to any post-development plan application for an allocated site being subject to a revised viability assessment (VA) which will be resource intensive (time and financial) for local planning authorities (LPAs) to check. The onus should be on applicants to prove economic circumstances have changed significantly before the LPA even considers a revised VA

**27) Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?**

a) Please explain. If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.

The S106A "Deed of Variation" process generates significant work for all parties. In cases where more substantial changes to S106 agreements are being made the requirements are proportionate to the importance of ensuring proper checks, governance and accountability to any S106 obligations.

If a category of more minor changes such as procedural amendments that would not affect the obligation itself, then a more streamlined process would be useful, for example version revision of a S106 agreement outside of full Deed of Variation.

A more efficient version control approach for S106 agreements would also be useful for both circumstances, including maintenance of a single canonical S106 document incorporating Deeds of Variation.

**28) Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government's commitment to boosting the supply of affordable housing.**

a) Please explain. If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations

**29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

Para.1 - This appears to deviate from s122(2) of the Community Infrastructure Levy Regulations 2010 (has this been done to avoid duplication of legislation?) Furthermore, who is the arbiter of the criterion d. re '*reasonable in all other respects*'? This is likely to lead to disagreement.

Para 2 - Some conditions (e.g. off-site works to exclude development from a residents' parking zone or implementing traffic restrictions) require an associated fee to undertake the legal processes for enabling works to take place (e.g. fee for the process to introduce / implement a traffic regulation order). Furthermore, local highway authorities often ask developers to dedicate land as highway land to enable small scale improvements (e.g. footway widening) or to ensure safety isn't compromised (e.g. land to protect visibility splays), usually part of associated s/38 s278 agreements. Therefore, Local Authorities should neither be precluded from imposing conditions which require necessary associated funding nor seeking dedication of land for conditions that require subsequent legal processes (TROs) or agreements (s38 or s278) to discharge them.

**30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Para. 1 - there are examples (e.g. Building Regulations 'standard' car parking bay size) where this regulatory regime has a land-use implication (larger parking bays required to accommodate larger cars) and will not operate effectively.

Para. 3 - It may not always be possible to undertake the parallel processing of planning and other regulatory consents (e.g. stopping up orders (s247 TCPA, 1990), vehicle crossings (s184 HA 1980)). LPAs should still have the right to state that permitted applications require other processes and consents (and that these may not be undertaken in parallel).

**31) Do you agree with the new intentional unauthorised development policy in policy DM8?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

We question if giving substantial weight to external factors (such as, if the unlawful change was deliberate) in deciding whether to grant permission would be a reasonable approach. If substantial weight is given to the fact that unauthorised development was intentional, there might be a risk of refusing development which was otherwise acceptable, and this seems to go against the presumption in favour of sustainable development. While we might give weight to deliberate unlawful acts as part of deciding whether to prosecute, this should not impact the planning decision.

**32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?**

a) If so, are there any particular additions or mitigations which we should consider?

**33) Do you agree with the new Article 4 direction policy in policy DM10?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

We are concerned that the proposed wording, and in particular the examples given in brackets in part a, overly restrict the ways in which Article 4 Directions can be used. The examples given suggest that they cannot be used for issues of visual amenity. Currently we have Article 4 directions in place in Conservation Areas for preserving the character of those areas; it does not seem, from the examples given, that this will be possible in the future. We would want to be able to continue to use Article 4 in this way as it has a positive impact on the locality where it is in place.

## **Chapter 4: Achieving sustainable development**

**34) Do you agree with the proposed approach to setting a spatial strategy in development plans?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Part 1a states that needs that cannot be met within neighbouring areas must be provided for. This may lead to a 'plan race' as to who delivers first. Without a duty to cooperate and demonstrating only that effective cooperation has been undertaken, how will this be reconciled if two neighbouring areas cannot meet their need? The test for any adverse impacts to substantially outweigh benefits is a very high bar. There may also be conflict arising between parts a and b.

**35) Do you agree with the proposed definition of settlements in the glossary?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

We agree that the definitions are sufficiently clear whilst also allowing for local interpretation. However, we are concerned that, until they are defined by the development plan, and given the application of policies S4 and S5, there will be a lot of argument over the extent of the boundaries. We also have concerns about impacts where the current up-to-date plan has no defined settlement boundaries and the timescale for defining these in the limits of the new 30-month timetable.

**36) Do you agree with the revised approach to the presumption in favour of sustainable development?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

The way policies S4 and S5 are written makes it look like only the NDMPs should be considered and not the development plan.

**37) Do you agree to the proposed approach to development within settlements?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Policy S4 is written to apply/consider only the NDMPs for development within settlements and not the development plan; This needs to be amended. If left as is, this would be a substantial cause for concern and contention.

Para. 1 - The term 'substantially outweighed' is open to interpretation and sets a particularly high bar; there is no differentiation between size of settlement or type of harm. For example, how much weight will be given to adverse impacts on the highway network or highway safety when TR6 (3) states "All development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety[...]."?"

**38) Do you agree to the proposed approach to development outside settlements?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Policy S5 is written to apply/consider only the NDMPs for development within settlements and not the development plan; This needs to be amended. If left as is, this would be a substantial cause for concern and contention. It may also conflict with plan-making, local spatial strategy and be in conflict with policy PM2 and PM9 which sets a framework for identifying the location of suitable sites for development.

Further to be explicit how this works in relation to green belt policy.

Policy S5 part 1d - This needs to build in consideration for local spatial strategies and where development should be directed /located locally to be suitable and sustainable. There is no regard in this to understand whether the PDL is sustainable/ accessible and whether the location of development is suitable in policy terms or relationship to local spatial strategy.

Policy S5 part 1h – this does not fully consider the location of railway stations and opportunities provided in their surrounds. Whilst this could offer a sustainable location, there needs to be further consideration for other infrastructure and services availability as well as rural vs urban opportunities. This type of development should be encouraged to be plan-led development to ensure that appropriate consideration can be given in the round to all relevant considerations. The use of the TTWAs, whilst understood, does not provide station level specific data; this may be important, e.g. rural vs urban opportunities to ensure this delivers communities not just housing estates. Further consideration needs to be given to whether the quantum of trains is sufficient to grant permission of development. If these are timed in quick succession or not going to key destinations, this would need further consideration. .

**39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons

Policy S5 part 1d - This needs to build in consideration for local spatial strategies and where development should be directed /located locally to be suitable and sustainable. There is no regard in this to understand whether the PDL is sustainable/ accessible and whether the location of development is suitable in policy terms or relationship to local spatial strategy.

Policy S5 part 1h – this does not fully consider the location of railway stations and opportunities provided in their surrounds. Whilst this could offer a sustainable location, there needs to be allowance for further consideration for other infrastructure and services availability as well as rural vs urban opportunities. This type of development should be encouraged to be plan-led development to ensure that appropriate consideration can be given in the round to all relevant considerations as well as other national/ local policies, e.g appropriate densities. The use of the TTWAs, whilst understood, does not provide station level specific data; this may be important, e.g. rural vs urban opportunities to ensure this delivers communities not just housing estates. Further consideration needs to be given to whether the quantum of trains is sufficient to grant permission of development. If these are timed in quick succession or not going to key destinations, this would need further consideration.

Policy S5 part g - We welcome the embedding to considerations for Gypsy and Travellers.

**40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.

This strategically aims for housing delivery but there may be opportunities suited for employment uses. By embedding this in policy, it will be more difficult to identify or secure sites for alternative uses where land values for housing are higher.

Policy S5 part 1h – this does not fully consider the location of railway stations and opportunities provided in their surrounds. Whilst this could offer a sustainable location, there needs to be allowance for further consideration for other infrastructure and services availability as well as rural vs urban opportunities. This type of development should be encouraged to be plan-led development to ensure that appropriate consideration can be given in the round to all relevant considerations. Density requirements may need to be bespoke subject to the context and location of stations; it would be wrong to assume that just because in proximity to railway station, one density applies.

The use of the TTWAs, whilst understood, does not provide station level specific data; this may be important, e.g. rural vs urban opportunities to ensure this delivers communities not just housing estates. Further consideration needs to be given to whether the quantum of trains is sufficient to grant permission of development. If these are timed in quick succession or not going to key destinations, this would need further consideration.

**41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) If not, please provide your reasons

This could prove very difficult practically, with Neighbourhood Plans coming forwards at various times, rarely coinciding exactly with the local plan process. Applying a localised housing need figure to such small areas can also be problematic and is likely to be controversial. Not all Local Plans seek to delineate need targets through a settlement hierarchy or small areas relevant to a neighbourhood plan. Neighbourhood plans should include guidance on allocations that are identified in the new local plan and circumstances/ design principles where development will be supported.

## **Chapter 5: Meeting the challenge of climate change**

### **42) Do you agree with the approach to planning for climate change in policy CC1?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

What does a 'radical reduction' in emissions mean in CC1? This would benefit from more clarification. How aligned is the policy with the Climate Change Commission view that 'progress is worryingly slow towards net zero'? Policy should go further / be stronger given the acknowledged 'climate emergency' and at a minimum be aligned with evidence-based national/local carbon abatement pathways. Local standards should be allowed and exceed nationally defined policy where need and delivery is clearly evidenced.

### **43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

Former para 167 referred to balancing climate benefits with conservation. This balance is omitted, which gives new permissive emphasis. Weighting has also changed from “significant” to “substantial”. There appears to be a general attempt to use adjectives more consistently throughout this draft and we agree with the purpose of this (elsewhere “substantial” is more widely used). However, conservation has lost its “great weight” and also becomes “substantial” implying a parity. There should be much clearer guidance on how to quantify different climate change public benefits (in NPPF or other) so a true balance can be made with quantified heritage harms. This doesn’t currently exist and without it decisions can be inappropriately biased in favour of any climate change for emotional reasons rather than objectively based.

We further note that implementation of this policy depends on Future Homes Standard / Future Buildings Standard requirements. FHS should incorporate consideration/standards on embodied carbon and if not, this is a blind spot. We note that the recently published Warm Homes Plan appears to be moving away from a fabric first approach.

**44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) What additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

The policy does not appear to allow for consideration of the cumulative impact of development on urban heat island effect.

Para. 1c doesn’t state whether highway drainage is to be included in SuDS.

**45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

This section is not very well explained and set out and needs more detail. Examples are required with links to other guidance.

**46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?**

Consideration of measures that help minimise impact on health from exposure to wildfires? (Is this picked up within Future Homes Standard and if not, why not?) CC3 should also address urban heat islands, NbS, building retrofit, green car parking.

The policy should incorporate provision for local food growing (addressing food security risks) and consideration/provision of water stress, potentially with a weighting for developments that reduce water demand / increases water recycling etc. This will help to address water security.

**47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?**

If we are looking at 70-80% emissions reduction through the Framework, where is the rest coming from? If developers are looking to retrofit, then this is more costly and disruptive than doing it from the outset; high standards need to be embedded. There should be more consideration of embodied carbon and other Scope 3 emissions through the construction process and related supply chains.

Does the emerging Future Homes Standard align with CCC balanced pathway for net zero, and if not, why not?

Solar PV is to become mandatory through Future Homes Standard – should this be twinned with mandatory battery storage to enhance local and national energy resilience? If so, we'd welcome being able to delineate this at the local level through the spatial strategy.

**Chapter 6: Delivering a sufficient supply of homes**

**48) Do you agree the requirements for spatial development strategies and local plans in HO1 and HO2 are appropriate?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

We welcome the detail in policy HO1. However, we note that the needs of different groups cumulatively may be different to the number of homes required through the standard method. The standard method does not take into account the need of different groups projected forward but will be the minimum starting point. The two datasets need to be reconciled.

Policy HO2 part 3b – we have concerns regarding requiring a high housing figure necessary to meet the needs of the neighbouring areas. This could be a ‘plan’ race where effective cooperation does not require a duty to agree to meet housing needs not accommodated in neighbouring authorities. Isn’t it sufficient that SDS’s seek to articulate this in their spatial strategy (parts 1 and 2) rather than leaving to LPs?

Plans should be required to specifically demonstrate how they are going to meet their affordable housing needs as well as overall housing need.

**49) Is further guidance is required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

If so, what elements should this guidance cover?

Social and affordable housing is generally well covered by Local Planning Authorities awareness and access to relevant evidence from Local Housing Authority Duties.

Any guidance should incorporate this group and additionally provide more needs assessment methodological approaches for:

- Disabled people – need for accessible housing including families with accessible housing needs
- Need for supported housing, including both short-term and “homes for life” type accommodation across relevant client groups
- Affordable housing with floating support or other support needs
- Older people and different types of older people’s accommodation
- Linking in statutory housing strategies e.g. homelessness, supported housing

**50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

We agree that incorporating the policy from PPTS gives clarity and assists in ensuring that traveller policy is fully integrated into planning policy, and should be given the same weight as other housing policy.

**51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) If so, what are the key principles this guidance should establish?

**52) Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**53) Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision making?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

We in general welcome Policy H04. Whilst we agree that this policy sets out expectations for policy in local plans regarding large scale development sites, there needs to be consideration for the proportionate amount of evidence. It is likely to be unreasonable for a local plan to identify all specific infrastructure requirements for a large-scale site, because much of the infrastructure (to mitigate impacts) can only be determined once detailed plans and assessments have been submitted in support of an application, such as a detailed Transport Assessment; it needs to allow at the decision-making stage for change in circumstance. Obtaining the necessary evidence prior to the submission (of a TA for example) will require significant additional resources at local plan stage that may be considered disproportionate. This may be contrary to Policy DM8.

We would also want to see specific requirements that new isolated major developments or major urban extensions are subject to size tests that demonstrate they are big and dense enough to viably sustain appropriate community facilities & services. These should include schools, a reasonable range of shops, doctor's surgery, local employment sites and other essentials for bulk of day to day activities being locally provided, plus maintaining frequent public transport links to nearest large settlements. These new settlements should be designed around walking, cycling and public transport priority.

**56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree  
Agree as the proposals should support affordable housing in rural areas.

**57) Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Strong support for this approach in order to improve national consistency of provision and future proofing of stock, and to reduce the need for cost of adaptations later. Would welcome understanding rationale for at least 40% homes delivered over the course of the plan to be delivered to M4(2) or M4(3) as starting point to feed into local level proportions.

**58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, and would you support an alternative minimum percentage requirement?

There should be a minimum proportion, but a more ambitious target should be supported for plan making. It is already common that local authorities have expectations of a high % of M4(2) on sites. It would be preferable for a clear decision-making expectation to be introduced for M4(2), which could be a minimum 40% as specified but increasing to locally identified need in the evidence base where this is higher. Would welcome understanding rationale for at least 40% homes delivered over the course of the plan to be delivered to M4(2) or M4(3) as starting point to feed into local level proportions. A decision-making obligation would be supported for locally identified need in the evidence base should be required for M4(3), subject to viability.

**59) Do you agree the proposals to support the needs of different groups, through requiring authorities to set identify sites or set requirements for parts of allocated sites are proportionate?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

It is agreed that setting clearer requirements for different types of housing to support specific groups will be helpful and may encourage development to come forward that meets an identified need, particularly for specialist and supported housing. Hopefully the proposal would reduce the requirement to demonstrate need on an application-by-application basis and provide more power for LPAs to refuse windfall applications where sufficient sites have been allocated for the specific type of housing being proposed.

However, gathering sufficient evidence of need will be challenging, and the need to allocate specific sites for specific types of housing will add a lot of time and complexity to the site appraisal process. We are also concerned that this approach

will lack flexibility, particularly for sites to react to market changes over the plan period and to take into account windfall development. For example, if lots of student housing comes forward as windfall development before it comes forward on allocated sites, there might no longer be a need to require it on the allocated sites.

**60) Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?

This could be a positive approach where there is recognition of assessed needs and assessed needs retain priority. However without this flexibility it would not be supported.

**61) Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons

We understand the intention of this policy is to encourage a breadth of allocations sizes for delivery, which is helpful to the market. However, this is only achievable where land is submitted that sufficiently meets the supply and the relevant criteria for allocation (as per Policy PM9 – available, suitable, achievable and viable). Should HO6 be within Policy PM9 to ensure relevant considerations are read and planned together?

**62) Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?**

Answer

Yes, this change is supported, in recognition of the challenges currently in meeting assessed needs e.g. for affordable housing and supported housing, and the social value of meeting these needs.

However, the need for homes should not override the quality of homes or communities to be provided. It will be essential that provision of accommodation is balanced against other policy factors to ensure sustainable communities and the quality of development delivered is high.

**63) Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Potentially, but we are concerned that this will be detrimental to the delivery of 3-4 bed family homes which will almost always be less financially viable for a developer (given that larger units means fewer units overall), making it harder to fulfil the overall need for these sized units.

Consideration needs to be balanced against the need identified under HO1.

**65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?

In the City of York 80% of affordable housing is expected to be social rent. However, it is recognised that viability may prevent this in some areas, minimum of 50% of affordable housing may be suitable nationally.

**66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?**

a) If so, what changes would be beneficial?

Yes, this should be incorporated into needs assessments (under policy HO1) and we would welcome some flexibility incorporated on space standards where designs are of good quality and include, for example, suitable communal amenities for the proposal.

**67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.

Allowing developers of medium sites to make financial contributions instead of on-site provision could significantly reduce direct delivery of affordable housing.

Financial contributions may not result in on site affordable housing for a significant duration due to land assembly, project management, procurement etc. Ensuring on-site s106 provision, including on medium-sized sites, is essential to meeting local housing need and supporting mixed communities.

Developers should be required to provide clear evidence as to why on-site provision is not possible and demonstrate early, meaningful engagement with registered providers.

Existing thresholds are considered sufficient. Introducing a new threshold of 50 homes would likely have a market distorting effect with applications that could support more homes likely to “bunch” just below the threshold.

**68) What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).**

Allowing developers of medium sites to make financial contributions instead of on-site provision could significantly reduce direct delivery of affordable housing.

Financial contributions may not result in on site affordable housing for a significant duration due to land assembly, project management, procurement etc. Ensuring on-site s106 provision, including on medium-sized sites, is essential to meeting local housing need and supporting mixed communities.

Developers should be required to provide clear evidence as to why on-site provision is not possible and demonstrate early, meaningful engagement with registered providers.

Existing thresholds are considered sufficient. Introducing a new threshold of 50 homes would likely have a market distorting effect with applications that could support more homes likely to “bunch” just below the threshold.

**69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly? Please explain your answer.**

This is not considered necessary; existing approaches are effective although there is inevitably delay in making use of a financial contribution to support delivery as opposed to direct S106 on-site delivery.

In order to spend more quickly, it would be helpful to allow a slice of S106 for project management of delivery by the Council.

**70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?**

Yes

No

a) If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.-

We consider that the existing approaches for calculation are appropriate and effective for the City of York. However, delay in negotiations could be avoided where arguments in relation to inputs are avoided, e.g. where there were nationally available, locally adaptable models that could support education planning for example.

**71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree  
Agree, this flexibility is supported where it can achieve better outcomes. More guidance around land transfer either within or outside of the application site and associated commuted sum provisions to ensure affordable housing viability would be welcomed.

**72) Do you agree the with the criteria set out regarding the locations of specialist housing for older people?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Agree. High quality, evidence based design, consultation with client groups and appropriate communal amenities are also important.

**73) Do you agree with the criteria set out regarding the locations of specialist community-based accommodation, including changes to the glossary?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**74) Do you agree with the criteria set out regarding the locations of purpose built student accommodation and large scale shared living accommodation, including changes to the glossary?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

We would support further policy on purpose-built student housing design standards.

**75) Do you agree the proposals provide adequate additional support for Rural Exception Sites?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, including what other changes may be needed to increase their uptake?

**76) Do you agree with proposals to remove First Homes Exception Sites as a discrete form of exception site?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Agree, First Homes are not a priority tenure by comparison to social rented housing in most areas, including the City of York.

**77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?

The proposed amendments to rural policy – particularly the recognition of Rural Exception Sites (RES) and the introduction of benchmark land values – are expected to enhance scheme viability and strengthen the affordability of rural housing delivery. However, the absence of a dedicated RES Permission in Principle risks undermining these benefits by constraining rural delivery.

**78) Do you agree the proposals to set out requirements for traveller sites at HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

**79) Please provide your reasons to Question 78, particularly if you do not agree**

Answer

Question whether HO12 1d is correctly articulated and potentially imposes a restriction on traveller sites that we do not impose on standard housing.

**80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree  
Agree, supporting built out times with appropriate flexibility to market conditions would be welcomed.

**81) Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns?**

- Yes
- No

a) Please provide your reasons

**83) Do you agree with the proposed changes to the Housing Delivery Test rule book?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

## **Chapter 7: Building a strong, effective economy**

**84) Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**85) Do you agree with the approach to meeting the need for business land and premises in policy E2?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**87) Do you agree with the approach to rural business development in policy E4?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

## **Chapter 8: Ensuring the vitality of town centres**

**88) Do you agree with the proposed changes to policy for planning for town centres?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**89) Do you agree with the approach to development in town centres in policy TC2?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) If not, please explain how you would achieve this aim differently

**90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?**

Answer

**91) Do you believe the sequential test in policy TC3 should be retained?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Our experience in York is that for larger development proposed outside defined town centres then the sequential test is largely a tick box exercise as we are aware that there are no large units available in the city centre. Where units are larger they are generally considered unsuitable by developers because of their non-standard floor plates and/or are an aggregation of smaller buildings. We still consider that it is appropriate for smaller development to undertake a sequential test as these can be more easily accommodated within the city centre. We appreciate the addition in TC3 of the requirement to consider accommodating development across multiple sites but it is our experience that this is not acceptable to developers for operational reasons.

**92) Do you agree with the approach to town centre impact assessments in policy TC4?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

While we question the need for sequential testing for larger development, we would still consider that an impact assessment is necessary to identify the potential impact on the vitality and viability of the city/district centres.

**Chapter 9: Supporting high quality communications**

**93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

This needs to build in further locations factors; We suggest adding the following to paragraph 1:

e. Be sited so as to not have an unacceptable adverse impact on the safety and equality of the travelling public, particularly walkers and wheelers

**94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

## **Chapter 10: Securing Clean Energy and Water**

**96) Do you agree with the approach to planning for energy and water infrastructure in policy W1**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

**97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon development in policy W2?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Does the Framework support consideration of the opportunity cost of land used for low carbon /renewable energy production?

**98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy?

**99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**Chapter 11: Facilitating the sustainable use of minerals**

**100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of 'minerals of national and local importance'?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Industry is very concerned about some of the changes being made, including the loss of reference that it is 'essential that there is a sufficient supply of minerals' and reference to the need to maintain an 'adequate and steady' supply of aggregates. These are important terms in setting the context for plan-making and decisions and underpinning the Managed Aggregates Supply System. With 'critical' minerals and now 'growth' minerals being given more explicit support in the NPPF (see Policy M3 clause d), the messaging is even more important, as other minerals are deemed not essential, including for 'growth'.

**105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

**106) Please provide your reasons in response to question 105, particularly if you disagree**

Answer

**107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

**108) Please provide you reasons in response to question 107, particularly if you do not agree**

Answer

**109) Do you agree with approach to coal, oil and gas in policy M5?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**110) Are there any other exceptional circumstances in which coal extraction should be permitted?**

- Yes
- No

**111) If yes in reply to question 110, please outline the exceptional circumstances in which you think coal extraction should be permitted.**

Answer

**112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

## **Chapter 12: Making effective use of land**

**114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

**115) If not, in response to question 114, what further guidance is needed?**

Answer

**116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Agree with Para. 1, d, ii in that creating homes should maintain safe access for occupiers and uses, both to and within the home.

**117) Do you agree policy L2 identifies appropriate typologies of development to support intensification?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) If not, what typologies should be added or removed and why?

**118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree L2/1/d about airspace above buildings. Object to the unqualified statement on encouraging proposals to “fill gaps in existing roof line”. Conservation areas are often characterised by a varied ridge line between buildings because adjacent buildings are often of a different age and design. This is part of the significance of the conservation area and this policy as written would harm this significance. Object to highlighting “where it is appropriate to have larger buildings such as at street corners” This is an outdated urban design concept and is not sufficiently common to highlight it as a policy norm.

**119) Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions.**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree  
Any proposal to create additional homes should maintain safe access for occupiers and users, both to and within the home.

**121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) If not, please explain how guidance could be clearer?  
L3/2 about density, particularly around stations. The policy should be balanced by a statement on the importance of also satisfying good design because good design becomes harder at higher density (to accommodate all functional requirements in a smaller space is harder without compromising placemaking). Policies on minimum density have in the past led to exploitation by some developers who used the policy as a lever for profit driven densification making poor quality places that we would not want to repeat.

**122) Do you agree with the minimum density requirements set out within policy L3?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence.

We would be concerned that the proposals for achieving particular densities in locations with high connectivity will push less dense development types (like Gypsy and Traveller sites) to less sustainable locations.

**123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**124) Do you agree with the proposed definition of a 'well-connected' station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters proposed for the number of Travel to Work Areas and service frequency appropriate for defining a 'well-connected' station?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons and preferred alternatives

**125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally?**

- Yes
- No

a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?

**126) Should we define a specific range of residential densities for land around stations classified as 'well-connected'?**

- Yes
- No

**127) In reply to question 126, if so, what should that range be, and which locations should it apply to?**

Answer

**128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

**129) Please provide you reasons in response to question 128, particularly if you disagree**

L4/1 about residential extensions. The use of language is ambiguous like “blend effectively” and footnote 46 defines the existing building as that at time of publication- the time of publication has no design relevance to the existing building. The state of the existing building at time of design proposal is the relevant factor- i.e .whether it is original or already extended and its scale and composition relative to its plot and context. We have also lost an important concept of an extension usually being “subservient” to the original host building, commonly cited by the inspectorate at appeal. Subservience is commonly appropriate and so if there is to be a policy norm it should include this.

**Chapter 13: Protecting Green Belt land**

**130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

**131) Please provide your reasons in response to question 130, particularly if you disagree.**

Answer

**132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

This is subject to context.. Whilst this could offer a sustainable location for development, consideration as to why the land is designated Green Belt, whether it is considered Grey Belt and the impact of its development could have must be given overall consideration. There needs to be allowance for further consideration for other factors, including the local spatial development strategy. This type of development should be encouraged to be plan-led development via exceptional circumstances to ensure that appropriate consideration can be given in the round to all relevant considerations, including the spatial strategy.

**134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

**135) Please provide your reasons in response to question 134, particularly if you disagree.**

Answer

In principle making better use of Green Belt land where able is supported. However, this is partly reliant on landowners identifying their land for opportunity. We would still be reliant on demonstrating whether the opportunities were reasonable taking consideration for suitability, deliverability and policy would need to aimed at being supportive in general, should they be brought forward for use.

**136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

As written this doesn't support and in fact undermines Purpose d in Policy GB2. We strongly advocate that this is amended. We do not agree with GB2 (h).

Whilst it is appropriate to target the most sustainable locations, the policy only considers sustainability in terms of the economic and social definitions under GB7 Part h. Environmental sustainability is not taken into account – for instance the wider heritage impacts of building within the Green Belt, where the Green Belt is identified to protect historic character and setting. GB7 (all of h but 1hiii in particular) does not allow for consideration of the impact (and potential harm) of the scale of development on historic character, only consideration of the availability of infrastructure. There is no consideration that the scale of development that may be considered appropriate or inappropriate on character or context (which differs from part c and d whereby it references '*Limited*'). In fact this would potentially allow major development under part Hv; this would be unacceptable and undermine plan-led development whereby the Green Belt would be a key consideration. We think this would be a key point of challenge in areas where determining the character and setting of the historic town has been the primary purpose for establishing Green belt.

**137) Do you agree policy GB7(1h) successfully targets appropriate development locations and types in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

As written this doesn't support and in fact undermines Purpose d in Policy GB2. We strongly advocate that this is amended.

Whilst it is appropriate to target the most sustainable locations, the policy only considers sustainability in terms of the economic and social definitions. Environmental sustainability is not taken into account – for instance the wider heritage impacts of building within the Green Belt, where the Green Belt is identified to protect historic character and setting. GB7 (all of h but 1hiii in particular) does not allow for consideration of the impact (and potential harm) of the scale of development on historic character, only consideration of the availability of infrastructure. There is no consideration that the scale of development that may be considered appropriate or inappropriate on character or context (which differs from part c and d whereby it references '*Limited*'). In fact this would potentially allow major development under part Hv; this would be unacceptable and undermine plan-led development whereby the Green Belt would be a key consideration. We think this would be a key point of challenge in areas where determining the character and setting of the historic town has been the primary purpose for establishing Green belt.

**138) Please provide your reasons to your reply to question 137, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers**

Answer

The policy would reduce the availability of land in well-connected locations which could be used for Gypsy and Traveller sites as there will be pressure to develop with more financially lucrative forms of development like housing.

**139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?**

Answer

**141) Do you agree with setting an affordable housing ‘floor’ for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

**142) Please explain your answer to question 141, including your view on the appropriate approach to setting a ‘floor’, and the right level for this?**

Agree, this could support further affordable housing provision to meet identified need. Local areas should have a suitable ‘floor’ set based on local need and market conditions.

**143) Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please explain your answer.

This is a technical question and needs technical consideration with knowledge on land values.

We would always advocate that, particularly areas such as York wherein land value is high, we would want to ensure the right and appropriate values are justified for inclusion in any assessment. This suggestion raises a material risk that the assumed BLV would not reflect real-world landowner expectations, particularly given the costs and uncertainties associated with promoting Green Belt land. It risks undermining overall viability, especially for complex sites needing major utilities, access, or environmental mitigation. This is also out of step with existing guidance that requires the viability testing must be evidence led.

We need a more flexible, evidence-driven approach — allowing BLVs to be calibrated to local markets, infrastructure demands, and policy burdens — to better support deliverability.

**144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?**

Answer

We would be concerned that nationalised rates would not account for regional variation, particularly areas of York wherein land value is high. We would want to ensure the right and appropriate values are justified for inclusion in any assessment.

This suggestion raises a material risk that the assumed BLV would not reflect real-world landowner expectations, particularly given the costs and uncertainties associated with promoting Green Belt land. It risks undermining overall viability, especially for complex sites needing major utilities, access, or environmental mitigation. This is also out of step with existing guidance that requires the viability testing must be evidence led.

We need a more flexible, evidence-driven approach — allowing BLVs to be calibrated to local markets, infrastructure demands, and policy burdens — to better support deliverability.

**145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

We understand that removing this provision may make it easier to identify grey belt and operability of the policy. However, we would be concerned that in some cases the areas where the openness of the Green Belt is informed by the protected areas, the assessment should be informed as such. We would welcome reassurance that the removal of footnote 7 does not diminish environmental, heritage or other protections, because these operate through separate established policy mechanisms.

## Chapter 14: Achieving well-designed places

**146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

DP1/d – it is useful to see the local plan is now expected to define expectations/circumstances for design review and ensures it is normalised into the planning process.

The text fails to acknowledge universal and well-established safety principles that particularly benefit women and girls. Best practice is already clear and includes things such as clear sightlines and natural surveillance, active street frontages and mixed-use development, thoughtful lighting design, and safe, well connected public transport routes. Because these principles are not embedded in national policy, they remain optional. As a result, women's safety depends on postcode and local priorities, rather than being treated as a national standard. Address policy gap to explicitly include the safety and lived experience of women and girls. The National Design Guide and Model Design Code should also be updated to include clear guidance on designing for women's safety. Major developments should be required to demonstrate how they contribute to safer environments, and gender impact assessments should be introduced for larger schemes.

**147) Do you agree with the approach to design tools set out in policy DP2?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

DP2/1/a includes a common mistake that existing character is always positive. So, phrase should change to "...opportunities to strengthen positive existing character".

**148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?**

- Strongly agree  
 Partly agree  
 Neither agree or disagree  
 Partly disagree  
 Strongly disagree

a) Please provide your reasons, particularly if you disagree

DP3 about key principles for well-designed places. We generally support the (future) move to make the NPPF more in sync with the language/classifications used in national design guides and understand that the National Design Guide and Model Design Code are to be withdrawn and consolidated into planning practice guidance. This may be beneficial, but we must not lose the diagram/illustrative/image qualities of these documents. Design standards and good practice is better explained visually rather than through dense text.

Suggested changes to policy wording **DP3/1/d**: .... green and blue infrastructure....

**DP3/1/f**: Not sure how useful this basic instruction is - *use the pattern of buildings to define the arrangement of streets, squares and other spaces.*

Buildings are not the only means of defining these components of place. Perhaps add *use the pattern of building and landscape infrastructure to define....*

**DP3/1/g**: Omit the word secure – could encourage exclusion and an overuse of fencing. Suggest re-wording to ‘feel safe’ since the perception of safety is key.

*include ‘a mix of’ spaces that are feel safe, secure, are inclusive, accessible for all ages and abilities and which facilitate and encourage social interaction, play and healthy lifestyles (for example by providing high quality, clear and legible pedestrian and cycle routes, a variety of recreational spaces and places to meet, and making building entrances and windows face onto streets and other public spaces to provide natural surveillance); and opportunities for respite and*

**DP3/1/h**: Given how important a sense of identity is (sense of place) this paragraph seems a bit weak, e.g. in the use of the words ‘design features and planting’ as these could be anything and not necessarily enough to provide a sense of identity. The following suggested tweaking might help:

*Identity: create visually attractive, distinctive and characterful built development, streets, and open spaces to establish or maintain a strong sense of place and pride, including through the use of a coherent palette of materials, researched and bespoke design features, and planting, such as landmark trees.*

**DP3/4:** If a scheme is genuinely landscape-led, i.e. expresses a deep understanding of the existing landscape and the layers of influence and interaction with it, and on it, by nature and humankind, and its potential to contribute to social, economic, and environmental gain through landscape as a 'system' (soils, drainage, topography, habitats, resources etc. etc.), it is worthy of note. Therefore, the following inclusion is suggested (if not here then elsewhere in this chapter):

*Substantial weight should also be given to outstanding or innovative designs which are genuinely landscape-led and/or promote high levels of sustainability, or which help raise the standard of design more generally in an area, so long as they are consistent with the overall form and layout of their surroundings*

**149) Do you agree with the proposed approach to using design review and other design processes in policy DP4?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) If not, what else would help secure better design and placemaking outcomes?

DP4/a about the weighing of Design Review panels in the planning process. Whilst this only says "take account of", we strongly recommend that Design Panels are commissioned by the LPA (through government funding). To expect a Design Panel to be impartial when paid for by the developer is unrealistic. We don't give this status or expect it of anyone else commissioned by the developer (the architect or highways consultant etc...). Panels must be unencumbered by this conflict of interest to get the most appropriate recommendations from them, especially if they are to be given weight in the decision process

**DP4/2/a:** ....take into account their outcomes, including any design recommendations made by design review panels.

Should there be a reference here to LPA's own internal professional design review resources? The importance of this internal resource is mentioned in the planning

practice guidance but omitted here, which may be seen to lessen its validity.

## Chapter 15: Sustainable transport

**150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

TR4/1/a: We recommend differentiating from “priority first to pedestrians and cycle movements” as grouped together, to “pedestrian movements first and then cyclist movements”, otherwise it gives an inappropriate implied parity

TR4/1/d: We support the inclusion of balancing functional requirements with phasing “...in ways which do not compromise key place making principles..”.

This is very important as functional requirements can easily be given priority in ways that do compromise placemaking.

Para. 2 is useful in that it allows ‘significant movement’ to be defined, locally.

**151) Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**152) Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Para. 1, b - CYC is still considering the suitability of continuous footways

Para. 1. e - This is likely to require more off-street parking on drives to enable EV charging within a dwelling and/or more EV charging at on-street parking bays (which will be in the public domain, unless the street isn't adopted), so could conflict with other place-making principles.

Para 2. Refers to Manual for Streets (MfS) – this should be deleted, because it is poor guidance that is nearly 20 years old and there a very few good examples of MfS – compliant development in existence. This reference should be to the fully revised Manual for Streets that was originally due in 2020.

**154) Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and**

**travel plans will be required, and for considering impacts on the transport network?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Para 2. Further clarification is required on the scope and scale of fallback options in Travel Plans if they fail to achieve the transport vision for the development – can additional financial obligations be sought if not already set out in the TP?

**156) Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Including more options to improve public rights of way networks gives focus the importance of public rights of way in planning decisions and development. Suitable and appropriate diversions should only be agreed where an improvement to the PROW network is provided.

## Chapter 16: Promoting healthy communities

**158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**159) Do you agree that Local Green Space should be 'close' to the community it serves?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term 'fast food outlets', and the types of uses to which it applies?**

Answer

**162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Whilst this seems at face value to be sensible and would help preserve vital infrastructure and community assets, only having one of a particular kind of facility remaining in a place could introduce inequalities in terms of access to that facility, depending on where the facility is sited and how the geographical scope of the place. Due care needs to be taken that this policy is not applied in a way that excludes people and introduces inequalities in terms of access to key services and infrastructure.

Rather than a focus on retaining community facilities, the emphasis should be on ensuring that an area has adequate availability, quality, and diversity of community facilities to support health and wellbeing and community cohesion. In some areas, this is unlikely to be achieved by prioritising retaining existing facilities, particularly in areas of high deprivation which have a lower availability and mix of facilities. Do not agree that public houses should be included with this, as these are not health promoting assets and alternative community assets would better meet the criteria for promoting health and community cohesion and reducing inequalities.

**163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of 'and/or' with reference to quantity and quality of replacement provision?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

This needs clarifying – the wording does not make it clear whether Local Green Space currently maintains its Local Green Space protections if it does fall within grey belt and will now lose this, or it currently does not maintain protections if it falls within grey belt and therefore this change is better retaining the Local Green Space protections.

The current wording / lack of clarity risks misinterpretation and therefore potentially inconsistent implementation which could put Local Green Space at risk.

## **Chapter 17: Pollution, Public Protection and Security**

**165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**166) Are any additional tools or guidance needed to enable better decision-making on contaminated land?**

Answer

**167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Para 1, c - air quality impacts of developments in or likely to generate significant traffic within in Air Quality Management Areas need to be considered.

**168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

## Chapter 18: Managing Flood Risk and Coastal Change

**171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**172) Do you agree with the proposed clarifications to the sequential test set out in policy F5?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Agree that surface water flooding should be considered. With regards to the scope/boundary of the application of the Sequential Test, this has always been a grey area amongst planning officers making a judgment as to whether there are no reasonably available alternative sites. Historically this has been an issue, and therefore the changes are very welcome.

**173) Do you agree with the proposed approach to the exception test set out in policy F6?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

This policy consolidates most references to the requirements of the flood risk 'Exceptions Test' and the clarification of what development types are regarded as

being incompatible with risk of flooding from rivers and sea which is set out in the Annex F in the draft Framework, this is very welcome.

With regards to the new wording included to clarify the circumstances in which the Exceptions Test need not be applied. The change in which this is tabled and not as a footnote at the bottom of the page is also welcome.

**174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

It is imperative that all new sites and SuDS should be in accordance with the National Standards for SuDS. All new planning applications should consider its requirements.

Para 1. doesn't explicitly state whether this is to include highway drainage.

**175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

While we understand the benefits of keeping watercourses open, de-culverting, and re-naturalisation of river channels we believe that, from a land take, this would be a challenge for development and would be strongly opposed by the industry where available land for building/housing is critical to a development being viable. We therefore consider that the policy is unlikely to result in watercourses being de-culverted, particularly because the wording requires this only 'where possible'.

**176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?**

Answer

**178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to

## **Chapter 19: Conserving and enhancing the natural environment**

**179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

We consider that 'strategic green infrastructure corridors and iconic views' should be included in policy N1/1/c after 'within protected landscapes'. York local authority area has no protected landscapes. Policies under this chapter correctly make reference to protected landscapes, but under the European Landscape Convention, to which the U.K. is signed up, all landscapes have a value, therefore it is important not to neglect landscapes outside of protected areas, i.e. all the positive qualities of any landscape should be subject to the benefits of environmental opportunities and safeguards and good design (not just protected landscapes).

**180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?**

Answer

**181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Policy N2/1/a: The natural beauty of all natural/outdoor spaces should be considered, not just that of the countryside. Add 'and outdoor spaces'.

Policy N2/1/d: Include 'cultural' value as well. Remove 'wherever possible' – that could be applied to anything and any policy. 'Landscaping' is not a helpful phrase and it sounds too much like earthmoving and planting as an afterthought. We suggest different wording such as: 'and use a landscape-led approach to design to create a development harmonious with its environment'.

**182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, including how policy can be improved to ensure compliance

Policy N4/2/c: It is worth distinguishing the different aspects of landscape into the landscape character and fabric and visual amenity, thus 'Any detrimental effect on the environment, the landscape 'character, fabric, and visual amenity' *and recreational opportunities.....*'

**183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?**

Answer

There is a mention of dark skies within protected landscapes under N4/3. There may be a need to mention consideration of lighting on night-time landscapes/views/residential amenity (not just within protected landscapes), and biodiversity, if not mentioned elsewhere.

## **Chapter 20: Conserving and enhancing the historic environment**

**185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons

Brings some clarity and further weight to designated assets and has been scrutinised prior to LURA being passed.

**186) Do you have any evidence as to the impact of implementing the additional regard duties for development?**

Answer

**187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Agree but concern over how a Local List would be compiled by Local Authorities. Even if externally commissioned the data needs to be embedded into HER. Is there a potential knock-on impact on to non-designated heritage assets that have not been identified by community? Similar capacity concerns re Conservation Area appraisals.

This is predicated on the understanding that the LURA stipulation to make HERs statutory will be implemented but is not followed through into policy HE3. Assume HERs are statutory in line with LURA although HER element not enacted yet. Does this need more emphasis? Again, resources are likely required nationally to ensure 'levelled up' HERs.

**188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

Should point 5 include the words 'below ground heritage assets'?

Should HE5 refer to NDHA as that term is used in HE7? We have some concern that the confusion between a NDHA, a heritage asset and a designated heritage asset will persist. Surely a NDHA and heritage asset in this instance are the same thing?

HE5 (2/c) Good to see a definition of "substantial harm" and I support this definition as it should reduce the misconception that substantial harm is akin to complete loss of all significance.

**189) Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

HE6/1: Object to the change of "great weight" in former para 212 to "substantial weight". Heritage assessments are complicated, and harm is often irreplaceable, so great weight is an important concept. This downgrading is likely to lead to more acceptance of irreplaceable loss of significance in decisions.  
HE6/3 on public benefit. Comment on this is linked to HE6/1. The downgrading from "great weight" gives externalised examples of public benefit (such as climate change) inappropriate implied parity, with little framework for making this balanced judgement, that will lead to more acceptance of irreplaceable loss of significance.

HE6/general. We have lost former para 215 which gave an approach to less than substantial harm. Former para 212 also included the useful concept of "optimal viable use" which is lost here. This should be reinstated.

**190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10?**

- Strongly agree
- Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

Welcome HE10 on archaeological assets, having strong HE10 is helpful, but it could lead to failed developments, which is referred to in HE11(1/a). However, while we do endeavour to enable development there may be some instances in cities like York where Preservation in Situ takes priority and/or that development may become unviable with the amount of archaeological excavation required. The essence of para 1 is correct but it perhaps reads as if development is the priority.

The most significant change appears to relate to existing footnote 75. The new footnote 75 uses the term 'monuments' (largely implying above ground assets only) and is worded so that it reads that there is a much higher bar to its application than the existing footnote. The words 'archaeological interest' have been removed. We have used this footnote several times in York to convey importance of some archaeological assets (particularly as Areas of Archaeological Importance are not covered by NPPF). Perhaps some wording to suggest below-ground archaeological assets are also be covered by this would be clearer?

**191) Do you have any other comments on the revisions to the heritage chapter?**

Further clarity on the 'decision makers'? 'Local planning authorities' appears to have been removed from the text. Who is deciding what is potentially nationally important or what weight to give harm? It should be LPAs so any ambiguity should be removed.

HE11 (1/b) about loss or removal of heritage asset. This is an important paragraph about ability to record evidence not being a factor in decision. This is now referred to as "decisive factor in deciding..." The meaning remains the same so supported here but isn't this an unnecessary tautology? We prefer how previously worded as "factor in deciding"

**192) Do you agree with the transitional arrangements approach to decision-making?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

**193) Do you have any further thoughts on the policies outlined in this consultation?**

Answer

**194) Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons, particularly if you disagree

## **Annex A - Data Centres / Onsite Generation**

**195) Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please provide your reasons

**196) Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial?**

Yes

No

a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.

**197) Do you have any views on how we should define 'co-located energy infrastructure'? Please provide your reasons.**

Answer

**198) Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres?**

Yes

No

a) Please provide your reasons

**199) What benefits or risks do you foresee from making this change? Please provide your reasons.**

Answer

## **Annex B - Viability: Standardised inputs in viability assessment**

**200) Would you support the use of growth testing for strategic, multi-phase schemes?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please explain your answer.

**201) Would you support the optional use of growth testing for regeneration schemes?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please explain your answer.

**202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty?**

Strongly agree

Partly agree

Neither agree or disagree

Partly disagree

Strongly disagree

a) Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market-led development

**203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?**

a) Please explain your answer. The government is particularly keen for views on whether clarifying the appropriate profit on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision making.

**204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?**

a) Please explain your answer

**205) Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?**

a) Please explain your answer

**206) Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please explain your answer.

**207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?**

a) Please explain your answer

**208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) In what circumstances might a premium, or the usual premium, not be required?

b) What impact (if any) would you foresee if this change were made?

**209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please explain your answer.

**210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used?**

- Decision maker discretion
- Another metric
- Neither

a) If another metric, please set out your preferred approach and rationale

**211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?**

a) Please explain your answer

**212) Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please explain your answer.

## **Annex C - Reforming Site Thresholds**

**213) Do you agree that a 2.5 hectare threshold is appropriate?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**214) Do you agree that a unit threshold of between 10 and 49 units is appropriate?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development?**

- Yes
- No

**216) In relation to question 215, if so, please explain your answer and provide views on potential mitigations.**

Answer

**217) Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?**

a) Please provide your reasons, particularly if you disagree

**218) If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?**

a) Please provide your reasons, particularly if you disagree

**219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.**

a) Please explain your answer

**220) If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.**

Answer

**221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.**

Answer

**222) Do you agree with the proposal to extend the Permission in Principle application route to medium development?**

- Strongly agree
- Partly agree
- Neither agree or disagree
- Partly disagree
- Strongly disagree

a) Please provide your reasons, particularly if you disagree

**223) Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?**

Answer

## **Public Sector Equality Duty**

**224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic?**

- Yes
- No

a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

**225) Is there anything that could be done to mitigate any impact identified?**

a) Please explain your answer