

Appendix 1

LURB- Open consultation on the proposed approach to updating to the National Planning Policy Framework

The Department for Levelling Up, Housing, and Communities is seeking views on how they might develop new and revise current national planning policy to support their wider objectives.

Duration: closes at 11.45pm on 2 March 2023

Response by South Cambridgeshire District Council and Cambridge City Council

Question number & wording	GCSPS Response
Q1. Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?	Yes. Whilst securing delivery of homes that are needed is important, the current test has many negative consequences. The five-year supply requirements have potential to undermine strategic planning and have detrimental impacts upon Greater Cambridge's built environment. They also lead to annual requirement for costly evidence, and uncertainty to local communities. The Councils support the greater certainty that would be provided by this approach.
Q2. Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?	Yes. A buffer can help ensure delivery of identified needs, but the need for it and the scale of it can depend on local circumstances. The various percentages adds unnecessary complexity, and the need for any form of buffer should be capable of being considered through the plan making process.
Q3. Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?	Yes. Strategic planning may lead to situations where delivery is higher in the early or later part of a plan period reflecting a chosen development strategy, and the system should be capable of acknowledging that rather than punishing areas which do not have a smooth development trajectory.

Question number & wording	GCSPS Response
Q4. What should any planning guidance dealing with oversupply and undersupply say?	No response.
Q5. Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?	Expanding protection given to Neighbourhood Plans is supported so long as it remains clear that these Plans must help deliver the strategic policies of adopted Local Plans. Such changes may also encourage further neighbourhood plan take up, therefore the government should continue to provide funding to local authorities to support their preparation and adoption.
Q6. Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?	Yes. The changes to paragraphs 1 and 7 emphasise the importance of meeting needs whilst considering sustainability implications. These changes are therefore supported.
Q7. What are your views on the implications these changes may have on plan-making and housing supply?	<p>It is acknowledged that the aim of these changes is to encourage plan making, by enabling greater local consideration of whether it is sustainable to plan for the standard method or whether an alternative figure is more appropriate.</p> <p>The proposed changes emphasises that the standard method is a starting point, which is then followed by a process of considering whether the need identified can be delivered sustainably. The NPPF could be clearer that there are two stages to this. First is identifying what the needs are. The second is consideration of whether those need can be met sustainably.</p>

Question number & wording	GCSPS Response
<p>Q8. Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?</p>	<p>Yes, more guidance would be welcome.</p> <p>The guidance should also acknowledge clearly that there may be areas where need is higher than the standard method 'advisory starting point'. It is noted that in paragraph 11 of the consultation it is intended that this is made clearer in future guidance.</p>
<p>Q9. Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?</p>	<p>The threat of green belt release being imposed on authorities despite them properly exploring need and the sustainability implications of meeting need and determining the right approach locally, should rightly be removed if plan making is to be encouraged.</p> <p>The 'building at densities significantly out of character' is an interesting addition, but capable of wide interpretation. Further guidance should be provided.</p> <p>There are a range of issues that should be capable of being considered when determining if it is appropriate to plan for the full level of need, and it is not entirely clear why only the three issues highlighted in the consultation have been drawn out. For example, a key issue is infrastructure availability. If identified needs cannot be supported by appropriate infrastructure delivered when it is needed to make development sustainable then then LPAs should be able to plan for less.</p>

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<p>Q10. Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?</p>	<p>In terms of the actual evidence, Heritage Impact Assessment or Design Code can help establish what is the characteristic density of the areas, and what may be appropriate in terms of future densities. Townscape appraisals and visual appraisals which use AVR to assess impact against existing baseline conditions could also be used. Even in historic cities such as Cambridge, there are areas which are more modern and are capable of accommodating relatively taller buildings. Urban areas and the heights of their buildings evolve and there is not one uniform density in many English cities, even historic ones such as Bath or Cambridge. As well as character, other key considerations will include access to services and facilities, and considerations relating to whether development would be sustainable.</p>
<p>Q11. Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?</p>	<p>Greater Cambridge authorities experienced a four-year local plan examination as part of their last round of plan making. This led to significant resource demands and costs. It also led to a period where the councils were not able to demonstrate a five-year housing land supply, resulting in many unplanned rural developments now being built out which are causing communities further distress. Changes to national policy are needed to avoid this happening again.</p> <p>The Greater Cambridge area is under significant development pressure, and its plans are heavily scrutinised including by promoters of high value sites. The volume and complexity of evidence needed for plan making is therefore very high, creating significant costs for the authorities and extending the plan making period. More should be done to make the plan making process proportionate and to help authorities deliver plans</p> <p>Changes to the soundness tests to help make evidence requirements proportionate are welcomed, although the actual impact of these changes is not completely clear as it will depend on how they are interpreted, including by the planning inspectorate.</p>

Question number & wording	GCSPS Response
<p>Q12. Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?</p>	<p>The proposal to maintain the previous tests for plans that have reached regulation 19 is a pragmatic solution to avoiding abortive work, but the revisions should apply to plans now reaching regulation 19 otherwise there may be a disincentive to proceed.</p>
<p>Q13. Do you agree that we should make a change to the Framework on the application of the urban uplift?</p>	<p>There are no direct implications for Greater Cambridge, but our plan making evidence has demonstrated the importance of delivering homes in highly accessible locations. The country's urban centres have a key role to play in this.</p>
<p>Q14. What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?</p>	<p>No response.</p>
<p>Q15. How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?</p>	<p>It is important that authorities work together to consider and address needs. Cambridge and South Cambridgeshire are producing a joint local plan, effectively recognising the functioning of the city within a wider hinterland. Other areas should be aiming to achieve this kind of cooperation. The removal of the Duty to Cooperate raises concerns as to whether it will undermine this. We await detail of what its replacement 'an alignment policy' will entail. As well as development numbers there are other important issues that require cooperation, such as utilities provision.</p>

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<p>Q16. Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?</p>	<p>The Greater Cambridge Local Plan is at the regulation 18 stage. A preferred options consultation was completed in 2021 which included proposed allocations. A full draft plan is planned for later in 2023, but changes in government policy are creating uncertainty and additional burdens adding to the challenges of plan preparation. This significant investment in plan making by the authorities should be recognised by the government.</p> <p>Whilst in the case of Greater Cambridge effective strategic planning means there is currently a robust land supply in place, a reduced land supply technical requirement would reduce the risk of that being undermined whilst plan making continues were there to be any changes in circumstance such as the impact of national economic factors.</p> <p>The proposal refers to a two year period, but there may be circumstances where plan making takes longer than this for justified reasons.</p> <p>The Greater Cambridge Local Plan timetable is impacted by a number of outside factors, most significantly the outcome of a DCO process to relate a waste water treatment works that would free up a key development site. DHLUC should acknowledge such local circumstances when applying such tests and requirements.</p>
<p>Q17. Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?</p>	<p>Yes.</p>

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<p>Q18. Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?</p>	<p>This is supported, as there can be circumstances, such as in Greater Cambridge, where significant efforts have been made to bring forward developments through development plans and then through the granting of planning consents. Delivery of those homes is outside the gift of authorities to control. Authorities should not be punished with uncontrolled development because of the decisions of developers where authorities have acted to grant permissions for deliverable schemes.</p> <p>However, the consultation is not clear how this would be measured. This should not be based simply on permissions granted in the relevant 3 year period. It should take account of the stock of live permissions granted, as large sites can take years to build out but remain developable sites. This would provide a true indicator of whether the authority has made efforts to support delivery through granting planning permissions.</p>
<p>Q19. Do you consider that the 115% ‘switch-off’ figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?</p>	<p>115% would seem a reasonable figure.</p>
<p>Q20. Do you have views on a robust method for counting deliverable homes permissioned for these purposes?</p>	<p>Local Planning Authorities monitor the number of homes with planning permission but not yet built. This data should therefore be readily available.</p> <p>However, implication of the question is that it would not just be consents granted, but a deliverability test, similar to that used in trajectories to demonstrate a five year housing land supply. Whilst the changes addressed at question 1 remove the resource requirement for maintaining and evidencing detailed trajectories, there is a risk that this would maintain it, this nullifying the benefit.</p>

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<p>Q21. What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?</p>	<p>Whilst Greater Cambridge authorities anticipate meeting the 2022 tests in their current form, the revisions are supported, therefore should be implemented as soon as possible.</p> <p>We would like to remind DHLUC that the current tests assess Cambridge and South Cambridgeshire separately, whereas Cambridge and South Cambridgeshire’s adopted local plans take a joint approach to housing delivery. We have raised this issue previously, and it should be rectified.</p>
<p>Q22. Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?</p>	<p>Delivering more social rent homes is important in areas such as Greater Cambridge when housing affordability is extremely challenging. Much of the new supply in the area for rented affordable housing has been in the form of Affordable Rent which can be set at up to 80% of market rent. Affordable Rent is often unaffordable to lower income groups because of the higher market rents in the area.</p> <p>Viability is a key issue when considering what affordable housing mix can be delivered. With the proposals within the Ministerial Statement dated May 2021 for the introduction of First Homes, this places further pressure on viability for registered providers due to the likely reduction in shared ownership and the ability to cross-subsidise the rented.</p> <p>As First Homes is not mentioned within the revised NPPF, it is unclear as government’s direction on this tenure and the proposed obligations on developers.</p> <p>Reference to Affordable Rents being set at no more than the Local Housing Allowance, unless otherwise agreed with the local authority, would be helpful to help to make Affordable Rent homes as affordable as possible to those on low incomes.</p> <p>In terms of social rent, where local authorities are identified as ‘areas of high affordability pressure’ there needs to be additional grant funding available to help fund social rented homes rather than Affordable Rented Homes on S.106 schemes.</p>

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<p>Q23. Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?</p>	<p>The proposed change to the NPPF provides specific tenure types suitable to meet older peoples needs. The value of this is recognised given that the demographics are clear in terms of an ageing population. Further guidance would be helpful to understand the different models for older people. Specifically, clarification on the planning use classification C2 or C3 when considering extra care housing and retirement type villages would be helpful.</p> <p>The proposal to ensure all new homes are built to M4(2) technical standards would also help to future-proof new homes to enable residents to live longer and independently in their existing home. Further consideration should also be given to how best to ensure homes are available to those that need M4(3).</p>

Question number & wording	GCSPS Response
<p>Q24. Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?</p>	<p>National policy should be supportive of the delivery of small sites, but this must not be at the cost of delivering a sustainable development strategy.</p> <p>Chapter 5 Paragraph 11 of the consultation references a focus on supporting small sites in urban areas. Cambridge and South Cambridgeshire would support this focus. Whilst supportive of the recycling of land in settlements, and encouraging large sites to support smaller developers, there is a danger that strengthening the small sites requirement could undermine the delivery of sustainable development if it forced plans to identify large numbers of small sites on the edges of villages. Plan making evidence shows that this would be the case in Greater Cambridge, and that such strategy would be counter to sustainability and achievement of net zero carbon. There should be sufficient flexibility for local circumstances to be considered when preparing local plans. There are many elements proposed in this consultation to provide local flexibility to respond to local circumstances. This is another policy area where this is vital.</p> <p>Currently the small sites policy does little to help provide affordable housing that meets housing needs. Reference to entry-level exception sites is still made, although this was superseded by the Ministerial Statement in May 2021 relating to First Homes Exception Sites. First Homes does not meet all affordable housing needs and there should be greater flexibility to bring forward 100% affordable homes to meet wider housing needs, rather than concentrated 'local' needs through rural exception site policies.</p>

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<p>Q25. How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?</p>	<p>Given sites of 10 or less dwellings can no longer be required to provide affordable housing by national planning policy, many small sites will not actually help overall affordable housing delivery. For some villages, this means that there is no prospect of providing affordable housing. Local flexibility to require affordable housing on smaller sites where it is demonstrated to be viable would help.</p> <p>Whilst supportive of the recycling of land in settlements, and encouraging large sites to support smaller developers, there is a danger that strengthening the small sites requirement could undermine the delivery of sustainable development if it forced plans to identify large numbers of small sites on the edges of villages. Plan making evidence shows that this would be the case in Greater Cambridge, and that such strategy would be counter to sustainability and achievement of net zero carbon. There should be sufficient flexibility for local circumstances to be considered when preparing local plans. There are many elements proposed in this consultation to provide local flexibility to respond to local circumstances. This is another policy area where this is vital.</p>
<p>Q26. Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?</p>	<p>Whilst we support greater emphasis on community-led development and would welcome a clear definition for this within the Glossary, we are cautious if the affordable housing for rent definition was too general in terms of its management. There are wider implications where the housing provider is not regulated by the Social Housing Regulator or does not have the governance safeguards in place in respect of mortgage in possession clauses.</p>
<p>Q27. Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?</p>	<p>Exception site policy has to meet identified housing need at a moment in time. Generally delivery of exception site schemes would be easier to deliver where the wider context of housing need is taken into consideration, rather than a snapshot in time.</p>

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<p>Q28. Is there anything else that you think would help community groups in delivering affordable housing on exception sites?</p>	<p>Increase in capital funding, including for land purchase, and set up costs. A Nationally funded hub to help guide community groups through the process would also help.</p>
<p>Q29. Is there anything else national planning policy could do to support community-led developments?</p>	<p>Whilst community-led development is one way to bring forward affordable housing, in reality this is a very small proportion. One of the main barriers for groups locally is access to free or cheap land. Therefore, overall flexibility to deliver exception sites through working with registered providers is likely to see greater increases in delivery.</p>
<p>Q30. Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?</p>	<p>Whilst it may appear desirable these approaches are fraught with difficulties. Planning consent goes with the land as it is based on planning merits. These proposed changes would move away from those principles.</p> <p>They present legal risks that will fall on local planning authorities, as implementation practice is likely to be developed by case law. If either approach is selected any legislation or regulations will need to be extremely carefully crafted and clear.</p>
<p>Q31. Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?</p>	<p>Option 1 has the usual appeal routes if an applicant doesn't agree with a decision. It is not clear what the recourse would be with option 2, but presumably it would be the courts. This would appear to bring with it significant risk of costs to the authorities.</p>
<p>Q32. Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?</p>	<p>Proposal b requires developers to explain how they propose to increase the diversity of housing tenures to maximise a development scheme's absorption rate. This maximisation must be balanced against other factors such as providing a mix which responds to local housing needs, and a mix necessary to deliver successful and balanced communities.</p>

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<p>Q33. Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?</p>	<p>Yes. Cambridge and South Cambridgeshire strongly support policy changes which support their ability to require good design. It would be useful to point towards guidance on how to assess this should be assessed, including how this links to the national design code.</p> <p>Whilst Design Codes are useful tools, there are resource implications if these are going to be prepared by local authorities. There are linkages to funding issues that need to be addressed, including through the upcoming planning fees consultation. There needs to be a recognition that Design Codes need to be supplemented by skills, good governance, proper integration into the planning process, and checking compliance etc if they are to make a difference in improving the quality of developments. The importance of collaboration with communities and landowners needs to be emphasised.</p>
<p>Q34. Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places', to further encourage well-designed and beautiful development?</p>	<p>Yes. Insertion of the word beautiful in several places within the NPPF is welcomed, but the impact this has will come down to its interpretation and the ability of Councils to make strong decisions on design which are backed at appeal. Clear guidance would need to be given to Planning Inspectors who consider appeals on this basis.</p>

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<p>Q35. Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?</p>	<p>Yes. Conditions should reference clear and accurate plans that provide assurance on the quality of scheme, and that provide detail at an appropriate scale that ensure that its intention can be implemented. Requirements should make clear that they need to be submitted in an easy to use format that can be easily examined. Changes to national planning guidance would assist where they make requirements for such plans clear to developers.</p> <p>Some conditions are incredibly costly to discharge such as details on large developments and hence any change in fee or encouragement to use pre-application consultation processes here would be well received. It should be made clear that conditions should not be discharged where they deliver poor quality (ugliness), not in accordance with the original design intention for which permission was issued.</p>
<p>Q36. Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?</p>	<p>It is surprising that a consultation on the National Planning Policy Framework makes such a specific reference to Mansard roofs.</p> <p>There are a number of ways densification appropriate to its surroundings can be achieved. The form should be left to individual authorities to assess dependent on what is appropriate in a particular context. There is a danger that this policy may lead to mansards being proposed in unsuitable locations, and making it difficult to resist at appeal due to an NPPF reference, in conflict with good design/beauty.</p>
<p>Q37. How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?</p>	<p>The principles in the associated National Design Guide are sound in relation to mitigation hierarchy and BNG. Artificial grass would count as sealed surface within the DEFRA metric and therefore offer no BNG units or wider SUDs benefits.</p> <p>There are potential requirements that could be introduced, such as requirement for integrated bird boxes to be included in all suitable dwellings. Greater Cambridge has a requirement in SPD like this, to ensure all developments help address declines of swift, house martin, house sparrow and starlings. This may require cross referencing with building regs.</p>

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<p>Q38. Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?</p>	<p>No. Whilst recognising the value of agricultural land, there are also circumstances where in order to meet needs its development cannot be avoided. The amendments proposed to the footnote in the NPPF do not provide clear guidance regarding how this issue should be considered in practical terms, leading to uncertainty. For example, what does it mean by availability, nationally? within the county? etc.</p> <p>There is also a missed opportunity to strengthen the NPPF in so far as supporting local food growing as an integral part of the design of new developments, for example through the provision of community gardens and allotments and integrating informal opportunities as part of the landscaping of new developments.</p>

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<p>Q39. What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?</p>	<p>The development of a methodology to enable the assessment of the carbon implications of spatial strategies and growth numbers can be a powerful tool in helping to reduce the climate impacts of proposed development. When combined with other evidence such as Local Area Energy Plans, it can help to direct development to more sustainable locations that help reduce reliance on the private car, and can also identify areas where issues such as grid constraints may impact on the speed of decarbonisation, helping to provide further evidence of the need for local plans to promote more ambitious net zero carbon standards that will meet areas net zero carbon targets, help to reduce peak demands and improve the resilience of the grid.</p> <p>As part of the evidence for the emerging Greater Cambridge Local Plan, we have commissioned consultants to undertake a carbon assessment of the various spatial strategy and growth options to help inform decision making around the location of growth. This has involved the development of a tool to enable the analysis of the carbon emissions associated with building's operational emissions (e.g. comparing the Future Homes Standard with more ambitious net zero carbon standards that take account of all energy used), transport related emissions and embodied carbon. This assessment has enabled us to direct our spatial strategy towards more sustainable locations, where priority can be given to more sustainable forms of transport. This assessment could be replicated for other local authority areas as much of the data used is taken from nationally available data sets.</p>

Q40. Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?

As part of our emerging Greater Cambridge Local Plan we have prepared a substantial number of policies relating to climate change adaptation and mitigation which seek to provide substantive solutions, often beyond current national requirements: [Climate change | Greater Cambridge Shared Planning \(greatercambridgeplanning.org\)](#)

Whilst ideally national policy will be changed to provide the equivalent or stronger requirements, local planning authorities must have the flexibility to provide their own policy responses which can be adapted to what is needed or what is possible in a local area. There is a concern that National Development Management policies could undermine our local efforts to address climate change. For example, reliance on the Future Homes Standard, which is predicated on grid decarbonisation to achieve true net zero carbon operational emissions, is a significant concern in areas like Greater Cambridge, where grid capacity constraints are already impacting on decarbonisation projects and restricting the ability of new large scale renewable energy generation to connect to the grid in a timely manner. One should also not overlook the significant pressure on grid decarbonisation that is coming from the need to retrofit the existing building stock. New development can not be allowed to add to that burden.

Another example of this is water efficiency. Current government policy only allows an alternative water efficiency standard of 110lpd. In Greater Cambridge there is evidence of a need for stronger standards of 80 lpd, and support for this from the local water companies. Such a standard is needed to support meeting development needs, and Local Planning Authorities should have the flexibility to set standards where there is local evidence justifying it.

There is reference in the consultation to requirements for more frequent updates to strategic Flood Risk Assessments. Whilst in Greater Cambridge we have updated our SFRA to support each new plan making cycle these studies are expensive, and significantly reliant on data from other parties, in particular the Environment Agency and the Lead Local Flood Authority. Unless those other parties provide suitable

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	<p>modelling and data this could place a significant additional burden on Local Planning Authorities.</p> <p>We welcome the references in the consultation document to addressing issues such as overheating, with more focus to nature-based solutions and multi-functional benefits. It is vital that this takes place in combination with front loading the building design process to ensure that passive design measures are integrated into all development proposals to reduce the overheating risk, prior to schemes being assessed against the new Part O requirements. Such an approach will also help to speed up the delivery of new homes as it will reduce the risk of amendments being required to permitted schemes in order to address issues identified as part of Part O assessments, which are often undertaken after planning permission has been granted. The National Model Design Code should also be strengthened in relation to promoting design solutions to mitigate overheating risk.</p>
<p>Q41. Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?</p>	<p>Yes</p>
<p>Q42. Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?</p>	<p>Yes.</p>
<p>Q43. Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?</p>	<p>Yes. Evidence prepared to inform our emerging local plan identifies that in order to support the transition to net zero carbon and keep Greater Cambridge within its carbon budget, the Local Plan will need to facilitate both community and commercial scale renewable energy generation, with a blend of both wind and solar based energy. The NPPF changes proposed make it more practicable to consider such policy through local plans, it is therefore supported. The changes also support local communities to bring forward schemes if they choose to do so.</p>

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<p>Q44. Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?</p>	<p>Yes. Adaptation of existing buildings is a vital element of responding to climate change.</p>
<p>Q45. Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?</p>	<p>No. There may be local circumstances that make the transitional deadline impractical to achieve, and could cause unintended delays in plan making. DHLUC need to recognise particular local circumstances, in order to avoid undermining authorities which are committed to plan making but face challenging local circumstances. In the case of Greater Cambridge there a range of local circumstances, including awaiting the outcome of a DCO on a HIF backed scheme (the North East Cambridge site) which is significant to the development strategy. This means that a plan where active work is happening now at reg 18 could slip beyond the transition date for the reg 19 stage.</p> <p>The timelines outlined in the consultation imply work on a new style plan can only commence in 2024. However even if the new system is chosen as the format of the plan it should be capable of taking into account plan making that has taken place before this, in particular public consultations that have been used to shape an emerging development strategy.</p>

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<p>Q46. Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?</p>	<p>No. DHLUC need to recognise particular local circumstances, in order to avoid undermining authorities which are committed to plan making but face challenging local circumstances. In the case of Greater Cambridge there a range of local circumstances, including awaiting the outcome of a DCO on a HIF backed scheme which is significant to the development strategy. This means that a plan where active work is happening now at reg 18 could slip beyond the transition date for the reg 19 stage.</p> <p>There is reference in the consultation to local plan reviews taking a maximum of 30 months to complete. This may be possible in many areas, but in complex areas with a large range of complex and often competing issues, where there is a strong desire to achieve high quality consultation and engagement, and where examinations even under the new system may take time, this may simply end up being impracticable. Deadlines should not be imposed in a way which undermine the quality of plan making or penalise those areas where LPAs are committed to plan making but have to address these challenges.</p>
<p>Q47. Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?</p>	<p>More clarity is required in relation to how Neighbourhood Plan groups will review their existing plans. Clear guidance should be provided for local groups regarding the implications. If the area of the plan has not substantially changed, then how will the group be able to complete a quick review of the old plan for example, rather than having to complete a whole-new style plan just to satisfy the new requirements. Preparing a plan is a significant commitment for volunteers, and they should be supported by a system which helps them.</p>

Question number & wording	GCSPS Response
<p>Q48. Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?</p>	<p>This proposal is very concerning given the important role these documents play. SPDs provide valuable guidance to assist consideration of planning applications, to ensure development is sustainable and to assist applicants to understand policy implementation. The simple expiry of plans risks undermining sustainable development. If the policies and guidance within them continue to accord with national policy (which could be demonstrated through a health check for example), why would they no longer be capable of being accorded any weight until they can be replaced.</p> <p>A significant volume of issues are addressed in SPD. The implication is anything LPAs wish to continue with must be included in a new local plan or a supplementary plan prepared alongside it. So not only must LPAs review a local plan in 30 months they must also review all their SPDs.</p> <p>There is no detail provided on the process for adoption of a supplementary plan. The level of detail that is required to change a document from an SPD to a Supplementary Plan is not stated. Will this necessitate a complete update of the document? If so, this will require a substantial amount of officer time and council resources.</p>
<p>Q49. Do you agree with the suggested scope and principles for guiding National Development Management Policies?</p>	<p>Whilst the principles look reasonable, they also offer significant scope for issues to be added to national policies which pass planning policy control to a national rather than local level. This risk is compounded by national policies taking precedence over local, which could result in a fundamental shift of local policy to the national level.</p> <p>There are clear benefits to establishing national policies set around current NPPF guidance on key topics which is applied as policy in all but name and provide a standardised national approach (such as flood risk), but this approach should be carefully applied if local control of planning decisions is not to be undermined.</p>

Question number & wording	GCSPS Response
<p>Q50. What other principles, if any, do you believe should inform the scope of National Development Management Policies?</p>	<p>A key principle should be that National Development Management policies should not undermine the ability of local planning authorities to develop local policies which respond to the issues and opportunities of their area.</p>
<p>Q51. Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?</p>	<p>Whilst the 'policy gaps' identified are important issues, they once again present the opportunity for national policy to limit local opportunity to address issues. Optional technical standards can be helpful if they are aspirational and challenging, but previous examples have actually reduced the ability of local authorities to respond to issues.</p>
<p>Q52. Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?</p>	<p>Flood risk, heritage, protection of playing fields and allotments, and green belt provide typical examples where there is clear national practice that could be translated into policy.</p>
<p>Q53. What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?</p>	<p>Mission 9 'Pride in Place' could be assisted by supporting effective engagement in planning matters.</p>
<p>Q54. How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?</p>	<p>The consultation advises they are particularly interested in labs and R&D. In the Greater Cambridge area there is significant demand for these types of uses, and the LPAs are seeking to ensure appropriate provision through a new local plan. Where there is speculative development, the framework should encourage major employment proposals to consider their housing impacts and seek opportunities to deliver mixed use developments</p>
<p>Q55. Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?</p>	<p>If policy changes are proposed, they need to be carefully prepared to ensure they take account of local character and heritage, and are designed to create high quality urban environments.</p>

Question number & wording	GCSPS Response
<p>Q56. Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?</p>	<p>Making places inclusive has been an aim of local planning policy, adding support in the national framework would be helpful.</p>
<p>Q57. Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?</p>	<p>Detail of the Infrastructure Levy is need as soon as possible because of the uncertainty it is causing, although note the Councils remain concerned about how the approach could impact on infrastructure delivery and funding, and this was reflected in its response to previous consultations on this. Delivery of infrastructure including utilities is a key issue that has the potential to delay delivery and more needs to be done to address this.</p> <p>There remain significant opportunities for building standards and other policies to respond more effectively to climate change. The policies and evidence developed for the Greater Cambridge Local Plan demonstrate a range of potential policy improvements.</p> <p>More should also be done in national guidance to support local nature recovery.</p>
<p>Q58. We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.</p>	<p>No response.</p>