

National Planning Policy Framework

Consultation questions

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

Email responses to: planningframework@communities.gsi.gov.uk

Written responses to:

Alan C Scott

National Planning Policy Framework

Department for Communities and Local Government

Zone 1/H6, Eland House,

Bressenden Place

London

SW1E 5DU

(a) About you

(i) Your details

Name:	
Position:	
Name of organisation (if applicable):	Wyre Forest District Council
Address:	Duke House, Clensmore Street, Kidderminster, Worcestershire, DY10 2JX
Email Address:	
Telephone number:	

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

Organisational response

Personal views

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

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

Yes

No

Name of group:

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

Private developer or house builder

Housing association or RSL

Land owner

Voluntary sector or charitable organisation

Business, consultant, professional advisor

National representative body

Professional body

Parish council

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

Other public body (please state)

Other (please state)

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

Yes

No

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

(b) Consultation questions

Delivering Sustainable Development

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

1(a) – Do you agree?

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

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

Paragraphs 9-19:

Paragraph 13: Wyre Forest District Council support the Government's commitment to the planning system supporting sustainable economic growth. This approach is central to achieving the vision and objectives set out within the Wyre Forest District Adopted Core Strategy. However, concerns are raised regarding the statement that significant weight should be placed on the need to support economic growth; economic considerations need to be duly balanced with social and environmental considerations which are essential components in delivering sustainable development.

Paragraph 14: There is concern regarding the presumption in favour of sustainable development in light of the limited information that the NPPF sets out to guide an authority's decision on whether or not development is sustainable. There is a concern that this level of openness to interpretation could lead to an increased number of planning appeals, which is contrary to the plan-led process that the NPPF supports. Whilst the positive approach is generally welcomed, a full definition of sustainable development is required to ensure that the distinction between inappropriate development and sustainable development can be clearly made.

Paragraph 17: The emphasis on Neighbourhood Plans is noted as is the role which they are expected to perform. Clarification that Neighbourhood Plans can not be used to deliver lower levels of development than set out within the Local Plan is welcomed. However, there is concern over how Neighbourhood Plans which look to deliver greater levels of development will sit

alongside the Local Plan.

Plan-making

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

2(a) Do you agree?

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

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

Paragraphs 20-52:

Wyre Forest District Council welcomes the continued emphasis on the plan-led system and in particular paragraph 22 which sets out the role of Local Plans.

Paragraph 20: There is concern over the lack of clarity in relation to “adverse impacts”, it is considered that more guidance is needed as to what constitutes an adverse impact and how these will be assessed. Is there a continued role for sustainability appraisal in assessing adverse impacts?

Paragraph 21: Whilst the Council support the flexibility to review plans in whole or part in response to changing circumstances, there is concern regarding the future role of Supplementary Planning Documents. SPDs are often used to provide greater clarity to landowners and developers, assisting in the timely development of locally strategic sites or addressing specific local issues, which is in accordance with the principles of Localism. The Council considers that SPDs will continue to be an important mechanism in delivering well planned, sustainable development, particularly in the form of Masterplans and Area Action Plans, which can support the more streamlined approach to national policy within the NPPF.

Paragraph 24, 2nd bullet point: Clarity is requested as to what is meant by longer term requirements.

Paragraph 26: Clarity is sought on the process for local authorities to obtain a certificate of conformity for their Local Plans and at what stage this should be done. Wyre Forest District Council is particularly interested in receiving clarification on the transitional arrangements, having an Adopted Core Strategy (2010) in place which pre-dates the NPPF.

Paragraph 27: Wyre Forest District Council welcomes the emphasis on the evidence base being proportionate.

Paragraphs 39-43: Wyre Forest District Council supports the need to ensure that development proposals are viable and deliverable and welcomes a sensible approach to ensure obligations and policy do not threaten viability. It is envisaged that this will include prioritisation of obligations on developments and independent viability testing when in question to ensure that viability is not used to support otherwise inappropriate development that would have an adverse impact on the surrounding area. Reference to the Community Infrastructure Levy is supported, which will help to ensure that infrastructure required during the plan period is delivered.

Paragraph 48: Wyre Forest District Council notes the additional test of soundness, however it is not clear how this will be tested at Examination in Public. Further clarification on this issue is requested. It would be useful for the Soundness Self-Assessment Toolkit to be updated to reflect the new requirements.

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

2(c) Do you agree?

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

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

Paragraphs 44-47: Wyre Forest District Council notes the new

arrangements for cross-boundary working and welcomes the support for collaborative working between District and County Councils and with neighbouring authorities as well as with the Local Enterprise Partnership. Further clarification is sought as to the extent of bodies which are covered under the Duty to Cooperate and a full list of these should be set out within the NPPF.

Decision taking

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

3(a) Do you agree

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

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

Paragraphs 53-70:

Wyre Forest District Council feels that the section on Development Management is extremely brief and fails to make any reference to enforcement matters and their role in the Development Management process.

The Council supports the reference to the importance of pre-application engagement and front loading of consultation. however, there appears to be a contradiction between paragraph 58 which states that the more issues considered at pre-application stage, the greater the benefits, and the final sentence of the same paragraph which states that consents relating to how a development is built or operated can be dealt with at a later stage. Clarity on where this distinction falls is requested as often the build and operation of a development can be important factors in determining its impact, particularly in terms of achieving high quality urban and architectural design.

Further clarity is sought in terms of how the principles of sustainable design and the achievement of BREEAM/Code for Sustainable Homes sits within this context as these need to be considered at the earliest possible stage in the design process

in order to maximise benefits.

Paragraphs 64-65: Whilst the opportunity to implement Local Development Orders, Neighbourhood Development Orders and Community Right to Build is welcomed, it is considered that further guidance on these mechanisms and the circumstances where they should be used should be given, in order to ensure sustainable development principles are delivered.

Paragraph 64 in reference to article 4 directions should make specific reference in relation to Conservation Areas which often have a specific need for these powers to preserve the historic environment.

Wyre Forest District Council is supportive of the approach to planning conditions and obligations set out in paragraphs 67-70

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

4(a) Do you agree

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

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

Whilst Wyre Forest District Council generally support the ambition of a streamlined national planning policy framework, there is concern over the danger of a policy vacuum being created in relation to Adopted Core Strategies which were prepared in accordance with previous guidance which stated that national planning policy should not be duplicated. Therefore, separate guidance is sought on the interim arrangements to address potential policy gaps as there is concern that this will work against the principles of Localism if not addressed.

Clarification is also sought as to when it may be appropriate to remove permitted development rights by planning condition as this has implications for residential barn conversions where the

permitted development rights have been removed on the basis that the building should be suitable for conversion without major alternations or extensions. When planning permission is granted for such conversions, permitted development rights are removed to prevent further alternations which could have a significant affect on the landscape of the locality.

Business and economic development

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

5(a) Do you agree?

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

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

Paragraphs 71-75

Paragraph 73: Wyre Forest District Council welcomes the importance placed upon planning for economic growth, however, there is no mention of the role of Local Enterprise Partnerships. Further clarity is sought over the role of LEPs in the planning process.

Paragraph 75: There is significant concern regarding this paragraph. The importance of safeguarding land for employment uses could be severely compromised in favour of housing delivery. Maintaining a good supply of employment land to meet short, medium and long term business needs and requirements is a fundamental part of delivering economic growth. Releasing such land for alternative uses without the support of a robust employment land review can only undermine the delivery of economic growth that lies at the heart of the NPPF. There are also issues with how this could affect the continued role of employment areas and the ability of businesses to operate, should other potentially conflicting uses that require a degree of amenity be allowed to develop in the heart of employment focused areas such as business parks

and industrial estates. Employment land should be offered stronger protection in the NPPF as this provides development locations and opportunities for businesses that will provide sustainable economic growth in the medium to long term.

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

Paragraphs 71-75

Generally, markets operate on cycles and these cycles tend to be shorter than the 15 year plan period. It is therefore important to have flexibility in development plans. There could be a greater role for the LEPs in monitoring and interpreting market signals in order to inform the planning process.

Further clarity is sought on the proposed market signals and in what context these could usefully inform plan making and development control decisions.

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

6(a) Do you agree?

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

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

Paragraphs 76-80:

Wyre Forest District Council generally supports the approach set out within paragraphs 76-80 particularly retaining the focus on the town centre and continuing to define a hierarchy of centres. The Council also supports the sequential approach set out within paragraph 77 however it is felt that more clarity could be given on the implementation of this.

There is concern regarding the wording in paragraph 78 in that it fails to put enough emphasis on the importance of locating retail and leisure uses within the town centre, which could lead

to a an increase in edge-of-centre and out-of-centre retail and leisure developments at the expense of continued decline of traditional town centres. Further to this, the Framework is silent on the role that retail and leisure developments can have in terms of regeneration, particularly brownfield sites. Previously developed town centre sites are by their very nature more complex to deliver but can have significant and multiple economic benefits for the vitality and viability of town centres and provides strong sustainable development outcomes.

Transport

The policy on planning for transport takes the right approach.

7(a) Do you agree?

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

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

Paragraphs 82-94: Wyre Forest District Council generally supports the approach to transport policy. The Council specifically welcomes the recognition of the difference in transport choices between urban and rural areas. Also welcomed is the continued emphasis on reducing greenhouse gases and congestion and the relationship between this and land use planning. The authority welcomes the emphasis placed on the travel plan as set out at paragraph 90.

Paragraph 92: The Council welcomes the emphasis placed upon locating day-to-day facilities within walking distance of homes.

Paragraph 93: The flexibility for local authorities to set their own parking standards and the removal of maximum parking standards is welcomed.

Communications infrastructure

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

8(a) Do you agree?

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

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

Paragraphs 95-99: Wyre Forest District Council is generally supportive of the approach set out, however, greater clarity is requested in terms of how this will need to be translated into Local Plan policies.

Minerals

The policies on minerals planning adopt the right approach.

9(a) Do you agree?

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

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

Paragraphs 100 – 106: Worcestershire County Council is the Minerals Authority for our administrative area and it is therefore considered that they are best placed to comment on these policies.

Housing

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

10(a) Do you agree?

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

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

Paragraphs 107-108: Wyre Forest District Council is supportive of the general principles which are set out for housing delivery.

Paragraph 109: Wyre Forest District Council has serious concerns regarding the requirement to provide an additional 20% of housing land on top of the 5 year housing land supply. This seems to be contradictory to the contents of the Decentralisation and Localism Bill and the abolition of top down housing targets. There is a danger that this will reduce the regeneration of brownfield sites as by ensuring greater choice in the housing land market, the most difficult sites are likely to be left undeveloped. These are also the sites which will often have the most economic regeneration benefits for local communities. There is also concern regarding the lack of clarity and detail within this paragraph, the words "at least 20%" further clarification is sought as to how the figure was arrived at and how this should be implemented.

Wyre Forest District Council strongly believes that authorities should be able to make allowances for windfalls within the Local Plan, this is particularly important given that the District has consistently delivered high levels of housing through windfall sites. It is also noted that the additional 20% can not be made up from windfalls.

The Council supports the approach to density with local targets being able to be set which are reflective of local circumstances.

Paragraph 112: The Council broadly supports the approach to rural exception sites, however it is felt that further clarity is

needed in terms of the % of market housing which might be appropriate on such sites in order to prevent them being dominated by market housing.

Paragraph 113: We note and support the continued emphasis on avoiding inappropriate development within the open countryside.

Planning for schools

The policy on planning for schools takes the right approach.

11(a) Do you agree?

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

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

Paragraph 127: Wyre Forest District Council supports the emphasis placed on pre-application discussions.

Design

The policy on planning and design is appropriate and useful.

12(a) Do you agree?

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

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

Paragraphs 114-123: Wyre Forest District Council supports the strong line that is taken in terms of ensuring that development

is of a high quality design and in the support for refusing schemes which demonstrate poor design quality. The Council feels that a link should be made between design and environmental sustainability both in terms of encouraging design based solutions to reducing energy use and in terms of designing to achieve Code for Sustainable Homes and BREEAM ratings. Environmental sustainability is a key part of ensuring the overall sustainability of developments and this can be achieved more cost effectively when designed in to proposals at concept stage.

The proposed use of local design review arrangements is welcomed. Separate national guidance on high quality urban design good practice would be welcomed

Paragraph 118: It is considered that there could be a potential conflict between the approach set out here and the design approach in Conservation Areas and where development affects a Listed Building. Perhaps a cross-reference to the heritage section would be of use.

Green Belt

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

13(a) Do you agree?

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

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

Paragraphs 133 – 147: Wyre Forest District Council are supportive of the strong Green Belt policy and note that development brought forward under a Community Right to Build Order would not be inappropriate development in the Green Belt.

Climate change, flooding and coastal change

The policy relating to climate change takes the right approach.

14(a) Do you agree?

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

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

Paragraphs 148-151: Wyre Forest District Council generally supports the policy approach to climate change and is pleased to see that both adaptation and mitigation are addressed.

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

14(c) Do you agree?

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

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

Paragraphs 152-153: The policy approach is generally supported.

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

14(e) Do you agree?

- | | |
|----------------|--------------------------|
| Strongly Agree | <input type="checkbox"/> |
| Agree | <input type="checkbox"/> |

- Neither Agree or Disagree
- Disagree
- Strongly Disagree

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

Paragraphs 152-153: It is considered that the policy approach could be open to interpretation. The phrase "if its impacts are (or can be made) acceptable" is considered to lack clarity in terms of the impacts to be considered and how "acceptable" is defined. There is concern that this could lead to uncertainty and therefore further clarification is requested.

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

14(g) Do you agree?

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

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

Paragraphs 154-158: Wyre Forest District Council supports the strong policy approach to flooding and the continued role for the Environment Agency in determining applications. However, further clarity is requested in relation to paragraph 158 in terms of the definition of minor development and the requirements for site-specific flood risk assessments.

Natural and local Environment

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

15(a) Do you agree?

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

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

Paragraphs 163 – 175: It is considered that an appropriate policy framework is provided.

Historic Environment

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

16(a) Do you agree?

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

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

Paragraph 180-181: Wyre Forest District Council welcomes the onus which is placed on the developer to understand the significance of heritage assets. This, alongside the requirements for the LPA in relation to heritage assets which are set out at paragraph 181 will help to secure the future of the District's heritage assets.

Wyre Forest District Council does however have some concerns regarding paragraph 183 particularly the sentence "As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification" which it considers is open to interpretation and could lead to the loss of heritage

assets.

Impact assessment

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

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

No comments

Planning for Travellers

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

It is noted that the NPPF does not include any reference to planning for gypsies and travellers. Given that this is a contentious issue, it is considered that further clarification should be provided within the NPPF with a cross reference to the Circular.

Specific questions on the impact assessment

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

Concern is raised over the lack of certainty which the NPPF provides in terms of determining planning applications. There is a concern that there will be an increase, not decrease in the number of planning appeals, particularly in the interim period as Local Plans are updated to take account of the changes in national planning policy. An increase in appeals could have particular cost implications for local authorities in terms of legal fees and officer time.

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

Yes – significant time taken to reconcile current policy framework and adopted LDF policies with that proposed under the new NPPF.

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

No Comment

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

No comment

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

The authority envisages that developers will seek to take advantage of the policy vacuum presented by the introduction of the NPPF and as a result there will be an increase in applications in the early days after its introduction. Also it is anticipated that there will be an increase in appeals as the NPPF provides less clarity and certainty than the existing series of national planning policy documents.

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

No comment

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

It is considered that the wider risks have been under-estimated. The current system of Local Development Frameworks is based upon the principle of not duplicating national planning policy. As such, the District has an Adopted Core Strategy but relies on national planning policy to provide the clarity on a number of issues. In the interim at least, there will be a policy vacuum and a loss of clarity and there is concern that this will make it difficult to refuse applications which are not considered

to be appropriate for the area; this will disadvantage local communities and it is contrary to the principles of the Decentralisation and Localism Bill.

The expected increase in appeals may divert planners away from the prompt processing of applications and the timely implementation of Local Plans.

It is considered that the resource implications of Neighbourhood Plans, particularly for small local authorities with limited numbers of planning staff need to be recognised.

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

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

i and ii) Likely to increase

iii) Could see more applications that are determined by appeal for both non-determination within the timeframe and as applicants appeal because of the lack of clarity provided by the NPPF.

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

- i) Consider the costs of plan production will go up as the evidence base is more onerous, particularly with the loss of the RSS and associated evidence base. The cost implications of Neighbourhood Plans will be significant for local authorities and could be disproportionately felt depending on how many community groups want to develop neighbourhood plans in any LA area.
- ii) The Neighbourhood Plans in particular could lead to an increase in businesses getting involved in the planning process. However, there is concern as to whether businesses preparing neighbourhood plans will be in the best interests of local communities.
- iii) Not known

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

Consider that the presumption will tip the balance towards economic objectives to the detriment of social and environmental objectives.

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

It is considered that there is likely to be an increase in appeals as the presumption is open to interpretation and people are likely to take advantage of this by trying their chances at appeal.

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

No comment

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

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

No comment

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

No comment

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

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

No comment

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

It is considered that Worcestershire County Council is best placed to comment here as the Minerals Authority.

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

Wyre Forest District Council currently has an adopted Core Strategy which prioritises the development of brownfield sites and therefore, all sites which are allocated for development must be in conformity with this. There is a concern that the removal of a national brownfield target will make it harder to deliver the more difficult brownfield sites as developers favour easier to develop Greenfield sites. This will be to the detriment of urban regeneration objectives.

QB3.2: Will the requirement to identify 20% additional land for housing be achievable?

And what additional resources will be incurred to identify it? Will this requirement help the delivery of homes?

Wyre Forest District Council would question the basis for the "at least 20%" figure. What evidence is this based upon and how do authorities determine the % uplift to apply? In terms of the impact of the 20%, for Wyre Forest District this could mean having to allocate some Greenfield sites, despite having enough brownfield sites to meet the need. Rather than opening up competition in the land market, this is likely to result in the delivery of Greenfield sites coming forward and the brownfield sites remaining undeveloped until at least later in the plan period. Although this requirement may help deliver homes, it is questionable as to whether these will be in the most appropriate locations and whether they will be delivered at the detriment of a coherent regeneration strategy for the District and the wider economic benefits this would bring.

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

The District's Adopted Core Strategy sets out a threshold of 10 dwellings in Kidderminster and Stourport and 6 dwellings in Bewdley and the rural areas. These thresholds are still considered appropriate and will not be changed until the next plan review.

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

No. The approach is set out within the Adopted Core Strategy and will remain unchanged until the next plan period.

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

There would be an additional cost however this is difficult to quantify at present without further details and investigation

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

No comment

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

No comment

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

More staff resources will be required to develop the evidence base or more resources will be needed to employ consultants to undertake this work. Greater collaborative working with statutory agencies will be required and it is questionable as to whether or not they will have adequate resources.

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

The policy needs clear definition as it could present an opportunity for people to prevent development coming forward within their communities.

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

There are implications in terms of more authorities needing to undertake Habitats Regulations Assessment and also a greater burden will be placed on the resources of Natural England in particular.

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

The removal of the local percentage requirement could reduce the amount of developments incorporating micro-renewables.

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

No as it is set out within the Adopted Core Strategy.

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

No, monitoring will continue to be undertaken in accordance with the Adopted Core Strategy Policy and Monitoring Framework.