

Part 3: Consultation questions

A. Policy questions

Q. No.	Section	Consultation Question
1a	Delivering sustainable development	<p>The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.</p> <p>Agree</p>
1b		<p>Do you have comments? (Please begin with relevant paragraph number)</p> <p>(Draft NPPF Para 1-8) - The Council supports the approach taken to streamline the amount of policy advice and guidance that exists at the national level at present. This should enable local planning authorities to clearly identify the Government's strategic planning objectives. In some cases the Government may need to consider the issuing of Guidance Notes that provide detailed advice to help clarify the strategic objectives set out in the NPPF.</p> <p>(Draft NPPF Para 10-12) - The Council considers that it should be local planning authorities who weigh up the relative importance of the 3 strands of 'sustainable development' in each individual case and through its plan-making activities. The Council would not wish to see a succession of appeal decisions at national level, whether by inspectors or the Secretary of State, that overturn Council decisions that have rejected development proposals because – locally – it has been decided that the environmental and social dis-benefits outweigh the economic benefits arising from the development.</p>

Q. No.	Section	Consultation Question
2a	Plan-making	<p>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.</p> <p>Agree</p> <p>Do you have comments? (Please begin with relevant paragraph number)</p> <p>(Draft NPPF Para 26) - The Council has recently submitted its Core Strategy DPD and is anticipating an Examination towards the end of this year. The Council would want to be re-assured that the considerable expenditure and efforts will not be wasted by an onerous requirement regarding the proposed certificate of conformity process.</p> <p>(Draft NPPF Para 27) - The Council welcomes the 'proportionate' approach to an evidence base but has some concerns regarding references to market signals and viability at a number of places in the NPPF and recognises that this could require expenditure to obtain expertise from outside the organisation.</p> <p>(Draft NPPF Para 49-52) - The Council has reservations about the resource implications of neighbourhood planning. It is understood that the Government will publish regulations for consultation in the near future.</p>

Q. No.	Section	Consultation Question
4a		<p>Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.</p> <p>Agree</p>
4b		<p>What should any separate guidance cover and who is best placed to provide it?</p> <p>The Council qualifies its response to Q4a by saying that if Guidance is produced by other organisations then it is important that Government endorses it and that PINs and the Secretary of State will take it into account in plan-making and the determination of planning applications/appeals. On the general point regarding Guidance, the Council would be disappointed if, having prepared a streamlined NPPF of about 58 pages, the Government sought to publish weighty guidance documents. One area that the Council suggest does need Guidance would be the historic environment.</p>
5a	Business and economic development	<p>The 'planning for business' policies will encourage economic activity and give business the certainty and confidence to invest.</p> <p>Neither Agree or Disagree</p>
5b		<p>Do you have comments? (Please begin with relevant paragraph number)</p> <p>See Below</p>
5c		<p>What market signals could be most useful in plan making and decisions, and how could such information be best used to inform decisions?</p>

Q. No.	Section	Consultation Question
6a		<p>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.</p> <p>Disagree</p>
6b		<p>Do you have comments? (Please begin with relevant paragraph number)</p> <p>(Draft NPPF Para 71-81) – The Council is concerned that the removal of the ‘Town Centre First’ policy regarding office development could lead to pressures on Greenfield sites that are well connected to the principal roads, and in particular the motorway network, which could not only threaten the viability and vitality of Town Centres but would also harm environmental objectives. In particular the Council draws attention to the potential threat to Green Belt land and its fundamental aim and purpose of openness and preventing urban sprawl.</p> <p>The Council has reservations about ‘avoiding the long term protection of employment land or floorspace’. Indeed, in South Staffordshire there has been a recent announcement of a major investment on a 90 hectare strategic employment site that has been protected through the planning system for 10 years. If a site of this size and in this location had not been protected then this global manufacturing company (JLR) may not have been able to select a suitable site in the UK.</p>

Q. No.	Section	Consultation Question
7a	Transport	The policy on planning for transport takes the right approach.
7b		<p data-bbox="716 348 846 380">Disagree</p> <p data-bbox="716 390 1308 457">Do you have comments? (Please begin with relevant paragraph number)</p> <p data-bbox="716 510 1328 1440">(Draft NPPF Para 84 & 85) – The Council considers that objectives of transport policy (Para 84) do not take account of the environmental impact of transport related development. The focus on economic growth is not properly balanced by environmental considerations. This is particularly acute in locations where the motorway network and primary routes pass through sensitive locations such as Green Belt and open countryside. In addition the environmental impact of the large scale facilities set out in Para 85 needs to be acknowledged as material planning considerations. These paragraphs as currently set out are skewed too heavily towards economic growth. The Council also considers that the objectives set out in Para 84 should acknowledge the challenges of rural communities and places where there are no alternatives to the motor car. The Council has been developing innovative solutions to help with this problem of rural accessibility in partnership with the County Council and other organisations. National policy should recognise the potential for the planning system to contribute to innovative solutions to help improve rural accessibility.</p> <p data-bbox="716 1472 1325 1703">(Draft NPPF Para 82-94) - On a general point the Council suggests that reference is made to the importance of local highway authorities consulting and engaging with local planning authorities in their plan making and development management activities.</p>

Q. No.	Section	Consultation Question
10a	Housing	<p>The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.</p> <p>Strongly Disagree</p> <p>Do you have comments? (Please begin with relevant paragraph number)</p> <p>(Draft NPPF Para 112) – The Council has reservations about the proposal to remove rural exception sites policy. The Council has an example of a successful rural exceptions site at one of its villages that is surrounded by Green Belt. The opportunity to offer affordable housing to local people (<i>secured through a local connections clause</i>), ‘in perpetuity’, has been well received locally. It would be detrimental if the proposals to allow market housing to be included lead to the loss of the local connections criteria and the ‘in perpetuity’ requirement for the affordable housing. (Draft NPPF Para 111) - The Council supports the removal of the site threshold for affordable housing – it is right that this should be determined locally within Local Plans.</p> <p>(Draft NPPF Para 109 & 110) - The Council remains concerned about the threat to Greenfield sites in the Green Belt and open countryside, arising from the Government’s continued requirement for local planning authorities to demonstrate at least a 5 year supply of housing land and the proposed requirement for an additional 20%. The integrity of the Green Belt and open countryside should not be put at risk simply because landowners/developers choose, perhaps for commercial reasons, to ‘landbank’ on sites where planning permission has been granted.</p> <p>(Draft NPPF Para 110) – The Council is reassured, to some extent by the qualification given in respect of the policy proposal ‘objectively assessed development needs should be met’. Councils where the Green Belt performs a vital role in respect of the future planning, within its boundaries, and also across into neighbouring Districts, should be recognised as being places where development needs are very unlikely to be met. To do so would seriously undermine the integrity of the Green Belt, its express purposes as set out in Draft NPPF (Para 134) and seriously harm the distinctive character and appearance of the local area. The Council would welcome clarification that reference to meeting ‘full requirements for market and affordable housing in the housing market area’ recognises that there will be parts of the housing market area, such as Green Belt, where the full requirements will not be met. Accordingly it would then follow that other parts of the housing market area, where adverse impacts are not so critical, would be expected to identify more housing land. The Council requests that the Green Belt is specifically mentioned in the following way in Para 110:</p> <p>‘ development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably out weigh the benefits, when assessed against the policies in this Framework taken as a whole and with particular emphasis on the purposes of the Green Belt.</p>
10b		

Q. No.	Section	Consultation Question
11a	Planning for schools	The policy on planning for schools takes the right approach.
11b		<p>Agree</p> <p>Do you have comments? (Please begin with relevant paragraph number)</p> <p>No – but, apart from schools, no specific questions on sustainable communities topic (Draft NPPF Paras 124-132). The following comments have been integrated into the specific questions asked in the Consultation – The Council broadly supports the Government’s objectives regarding sustainable communities but would draw attention to the issue of green spaces and greenfields in general. Currently PPS7 protects open countryside from development that could damage its integrity. The Council fully support the Green Belt and indeed 80% of South Staffordshire is designated as such. The Council can understand the value of the proposed Green Space Designation – particularly within and close to urban centres. However, there appears to be no reference to the protection of the ‘open countryside’ in Draft NPPF. The Council considers this to be an omission.</p>

Q. No.	Section	Consultation Question
12a	Design	The policy on planning and design is appropriate and useful.
12b		<p>Strongly Agree</p> <p>Do you have comments or suggestions? (Please begin with relevant paragraph number)</p> <p>(Draft NPPF Para 114-123) – The Council strongly supports the Government’s objectives regarding design and in particular the expectation that developers should work closely with those directly affected and take account of the views of the community. The Council has taken its own steps to raise the standards of design in South Staffordshire through the publication of its Village Design Supplementary Planning Document. In addition the Council holds a bi-annual design awards competition. In addition it has access to a Design Review Panel for southern Staffordshire where it works in partnership with neighbouring Districts through the Southern Staffordshire Partnership (SSP). The SSP holds its own bi-annual design awards competition.</p>

Q. No.	Section	Consultation Question
14c		<p>The policy on renewable energy will support the delivery of renewable and low carbon energy.</p>
14d		<p>Neither Agree or Disagree</p> <p>Do you have comments? (Please begin with relevant paragraph number)</p> <p>See Below</p>
14e		<p>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</p>
14f		<p>Neither Agree or Disagree</p> <p>Do you have comments? (Please begin with relevant paragraph number)</p> <p>See Below</p>

Q. No.	Section	Consultation Question
14g		<p>The policy on flooding and coastal change provides the right level of protection.</p> <p>Neither Agree or Disagree</p>
14h		<p>Do you have comments? (Please begin with relevant paragraph number)</p> <p>No comments on Q14h</p> <p>(Draft NPPF 148-162) - Broadly support the Government's objectives regarding climate change, flooding and coastal change. However, remain concerned about the impact of commercial scale wind turbine developments – particularly where the impact of the development is high – in terms of its visual impact on the landscape and local residential amenities - and it has not been demonstrated that the quantum of renewable energy to be generated is significant. Applicants should be required to provide the information relating to the quantum of wind energy generated in order to demonstrate need through a business case. This is currently not the case so it constrains a proper balancing of the arguments for and against this form of development. It should also be noted that this may apply to farm scale anaerobic digesters where there is impact on local roads and loss of food production on agricultural land where the crops are grown to be used in the anaerobic digesters.</p>

Q. No.	Section	Consultation Question
17a	Impact Assessment	<p>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:</p> <p>Is the impact assessment a fair and reasonable representation of the costs, benefits and impacts of introducing the Framework?</p> <p><i>Council's general comments</i> – The Government has under-estimated the costs of local planning authorities sourcing robust economic information so that it is able to assess matters raised in the Framework such as market signals, viability and an 'acceptable return' to landowners and developers.</p> <p><i>'Do you have any 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?'</i></p> <p>The Council has strong concerns about the issues raised by Traveller Site provision and remains extremely disappointed about the lack of protection to the Green Belt in particular, afforded by proposals set out in the draft Planning Policy Statement on Traveller Sites. These views have been expressed formally within the parameters of that Consultation. The District Council is particularly concerned about the recent tendency for planning inspectors and the Secretary of State, on appeal, to grant temporary planning permissions – which are not being recognised by Government or PINs as contributing towards the future supply of pitches. Once temporary traveller sites have become established they are extremely difficult, and costly, for the local authority to remove. An additional point in the context of Draft NPPF would be one of consistency. When draft planning policy for traveller sites is integrated into the new NPPF then it should follow the approach taken with other topics – limited to 2 or 3 sides of A4.</p>
Add Question	Traveller Sites	

B: Impact assessment questions

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.
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?
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?
QA4	Can you provide further evidence to inform our assumptions regarding wage rates and likely time savings from consolidated national policy?
QA5	What behavioural impact do you expect on the number of applications and appeals?
QA6	What do you think the impact will be on the above costs to applicants?
QA7	Do you have views on any other risks or wider benefits of the proposal to consolidate national policy?
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?
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?
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?
QB1.4	What impact, if any, do you think the presumption will have on the number of planning appeals?
QB2.1	Do you think the impact assessment presents a fair representation of the costs and benefits of the policy change?

<p>QB2.2</p> <p>QB2.3</p> <p>QB2.4</p> <p>QB2.5</p>	<p>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?</p> <p>How much resource would it cost to develop an evidence base and adopt a local parking standards policy?</p> <p>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 this policy change?</p> <p>Do you think the impact assessment presents a fair representation of the costs and benefits of the policy changes on minerals?</p>
<p>QB3.1</p> <p>QB3.2</p> <p>QB3.3</p> <p>QB3.4</p> <p>QB3.5</p> <p>QB3.6</p> <p>QB3.7</p>	<p>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?</p> <p>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?</p> <p>Will you change your local affordable housing threshold in the light of the changes proposed? How?</p> <p>Will you change your approach to the delivery of affordable housing in rural areas in light of the proposed changes?</p> <p>How much resource would it cost local councils to develop an evidence base and adopt a community facilities policy?</p> <p>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?</p> <p>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?</p>
<p>QB4.1</p> <p>QB4.2</p> <p>QB4.3</p> <p>QB4.4</p> <p>QB4.5</p>	<p>What are the resource implications of the new approach to green infrastructure?</p> <p>What impact will the Local Green Space designation policy have, and is the policy's intention sufficiently clearly defined?</p> <p>Are there resource implications from the clarification that wildlife sites should be given the same protection as European sites?</p> <p>How will your approach to decentralised energy change as a result of this policy change?</p> <p>Will your approach to renewable energy change as a result of this policy?</p>

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?
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