

## Response ID ANON-SNQ4-RSCN-V

Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system  
Submitted on 2024-09-19 11:50:51

### Scope of consultation

### Respondent details

a What is your name?

Name:  
Joanna Stay

b What is your email address?

Email:  
town.clerk@horleytown.com

c What is your organisation?

Organisation:  
Horley Town Council

d What type of organisation are you representing?

Neighbourhood planning body, parish or town council

If you answered "other", please provide further details:

### Chapter 1 – Introduction

### Chapter 2 – Policy objectives

### Chapter 3 – Planning for the homes we need

1 Do you agree that we should reverse the December 2023 changes made to paragraph 61?

Yes

Please explain your answer:

Agreed - a key factor is the mix of housing provision eg allowance for social housing for rent.

2 Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

Yes

Please explain your answer:

Agreed - we have no confidence that neighbouring authorities will co-operate as each of them will probably struggle to meet their own housing targets, which can create an adverse impact on infrastructure to support new development.

3 Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Not Answered

Please explain your answer:

N/A

4 Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

No

Please explain your answer:

No - housing densities should take into consideration the location and character of the area. What might be appropriate in a city centre location may not be appropriate in a more urban setting.

5 Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes

Please explain your answer:

Agreed - please see our comments under question 4.

6 Do you agree that the presumption in favour of sustainable development should be amended as proposed?

Not Answered

Please explain your answer:

Unsure - whilst we support sustainable development, it should always be part of an adopted local plan.

7 Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

Yes

Please explain your answer:

Agreed - it is the only means by which a planning authority can determine where developments should take place.

8 Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Not Answered

Please explain your answer:

Unsure - under delivery is not necessarily the responsibility of the local authority who have granted development but developers have not necessarily completed development.

9 Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

Not Answered

Please explain your answer:

Unsure - depends upon land availability in each local authority area.

10 If Yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

Not Answered

Please explain your answer if you believe a different % buffer should be used:

Please see our answer to question 9

11 Do you agree with the removal of policy on Annual Position Statements?

Not Answered

Please explain your answer:

No comment

12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

No

Please explain your answer:

No - in respect of housing in our area, we think that all local planning authorities will be challenged to meet their housing targets, however infrastructure is a key area which does require better co-operation between neighbouring authorities and the utilities.

13 Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Not Answered

Please explain your answer:

N/A

14 Do you have any other suggestions relating to the proposals in this chapter?

Please provide any other suggestions relating to the proposals in this chapter. :

No comment

#### Chapter 4 – A new Standard Method for assessing housing needs

15 Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

Not Answered

Please explain your answer:

N/A

16 Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

Not Answered

Please explain your answer:

N/A

17 Do you agree that affordability is given an appropriate weighting within the proposed standard method?

Not Answered

Please explain your answer:

N/A

18 Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Not Answered

Please explain your answer:

N/A

19 Do you have any additional comments on the proposed method for assessing housing needs?

Please provide any additional comments on the proposed method for assessing housing needs.:

N/A

#### Chapter 5 – Brownfield, grey belt and the Green Belt

20 Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes

Please explain your answer:

Agreed - we fully support the use of brownfield sites to promote new developments, both residential and commercial.

21 Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

Not Answered

Please explain your answer:

N/A

22 Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Please provide any further views:

N/A

23 Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

Not Answered

Please explain your answer:

N/A

24 Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Not Answered

Please explain your answer:

N/A

25 Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Not Answered

Please explain your answer:

N/A

26 Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Not Answered

Please explain your answer:

N/A

27 Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Not Answered

Please explain your answer:

N/A

28 Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

Yes

Please explain your answer:

Agreed - please see our response to question 20

29 Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Not Answered

Please explain your answer:

N/A

30 Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

Not Answered

If not, what changes would you recommend?:

N/A

31 Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Not Answered

Please explain your answer:

N/A

32 Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

Not Answered

Please explain your answer:

N/A

33 Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

Not Answered

Please explain your answer:

N/A

34 Do you agree with our proposed approach to the affordable housing tenure mix?

Yes

Please explain your answer:

Agreed - a mixed approach to affordable housing should always be adopted to meet the needs of the local community eg greater emphasis on social housing for rent

35 Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

Not Answered

Please explain your answer:

N/A

36 Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Not Answered

Please explain your answer:

N/A

37 Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

Not Answered

Please explain your answer:

N/A

38 How and at what level should Government set benchmark land values?

Please explain your answer:

N/A

39 To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

Not Answered

Please explain your answer:

N/A

40 It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Please explain your views on this approach:

Agreed - the percentage of affordable housing should be assessed and determined through the local plan

41 Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

Yes

Please explain your answer, including what support you consider local authorities would require to use late-stage viability reviews effectively:

Agreed - contributions should recognise the local plan either in construction or commuted sums.

42 Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

Not Answered

Please explain your answer:

N/A

43 Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

Not Answered

Please explain your answer:

N/A

44 Do you have any comments on the proposed wording for the NPPF (Annex 4)?

Not Answered

Please explain your answer:

N/A

45 Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

No

Please explain your answer:

No comments

46 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

No comments

Chapter 6 – Delivering affordable, well-designed homes and places

47 Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes

Please explain your answer:

Agreed - most definitely

48 Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

No

Please explain your answer:

No - to support greater home ownership, affordability is a key factor

49 Do you agree with removing the minimum 25% First Homes requirement?

No

Please explain your answer:

No - please see answer to question 48 above

50 Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

No

Please provide any further comments:

51 Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes

Please explain your answer:

Agreed - this is an essential requirement

52 What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Please explain your answer:

As a lot of local authorities have sold off their housing stock under the 'Right To Buy' or to a social landlord, the key question is how social rent affordable housing developments will be funded?

53 What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Please explain your answer:

This is down to a robust local plan.

54 What measures should we consider to better support and increase rural affordable housing?

Please explain your answer:

N/A

55 Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Yes

Please explain your answer:

Agree - we support this proposal

56 Do you agree with these changes?

Yes

Please explain your answer:

57 Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

No

If Yes, what changes would you recommend?:

58 Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

No

Please explain your answer :

No - in our community, these are normally windfall sites and therefore their contribution towards housing targets is unpredictable but can make a useful contribution over time and closely monitored.

59 Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

Yes

Please explain your answer:

Agreed - 'beauty' and 'beautiful' are too subjective as policy guidance. Well designed buildings and places are well established in planning policy, with clear terminology.

60 Do you agree with proposed changes to policy for upwards extensions?

Yes

Please explain your answer:

Agreed - where appropriate by site and in keeping with the local character and street scene.

61 Do you have any other suggestions relating to the proposals in this chapter?

No

Please explain your answer:

## Chapter 7 – Building infrastructure to grow the economy

62 Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Yes

Please explain your answer:

We support the proposed changes in principle, however we do not think there are currently any suitable sites in Horley, with a possible exception of the proposed business park which is HOR9 in the current DMP.

63 Are there other sectors you think need particular support via these changes? What are they and why?

Yes

Please explain your answer:

The proposed business park mentioned above is intended to target high tech companies.

64 Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

Not Answered

Please explain your answer:

No comment

65 If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

Not Answered



If Yes, what would be an appropriate scale? :

No comment

66 Do you have any other suggestions relating to the proposals in this chapter?

No

Please explain your answer:

### Chapter 8 – Delivering community needs

67 Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Yes

Please explain your answer:

Agreed - we support this, subject to it being appropriate to the locality in design and character.

68 Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Yes

Please explain your answer:

Agreed - fully support these changes

69 Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Yes

Please explain your answer:

Agreed - any changes which can result in infrastructure which supports development, particularly in advance or at the same time sites are being built, is to be welcomed.

70 How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Please explain your answer:

N/A

71 Do you have any other suggestions relating to the proposals in this chapter?

No

Please explain your answer:

### Chapter 9 – Supporting green energy and the environment

72 Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

No

Please explain your answer:

We have concerns that this is another proposal which seeks to bypass local planning authorities.

73 Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Yes

Please explain your answer:

Agree in principle, but not through the NSIP.

74 Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Not Answered

Please explain your answer:

N/A

75 Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Not Answered

Please explain your answer:

No comment

76 Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Not Answered

Please explain your answer:

No comment

77 If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Please explain your answer:

No comment

78 In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Please explain your answer:

We support improvements with national policy providing guidance to local authorities when drawing up local plans.

79 What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Please explain your answer:

No comment

80 Are any changes needed to policy for managing flood risk to improve its effectiveness?

Yes

Please explain your answer:

We would like to see a greater focus on flood mitigation measures to include riparian responsibilities and maintenance of major water courses to ensure they are effective.

81 Do you have any other comments on actions that can be taken through planning to address climate change?

No

Please explain your answer:

No further comments

82 Do you agree with removal of this text from the footnote?

Yes

Please explain your answer:

Agreed - loss of agricultural land is a concern over the future impacts of the country and food security.

83 Are there other ways in which we can ensure that development supports and does not compromise food production?

Yes

Please explain your answer:

Yes - we have concerns on the proposal to regrade green belt land. What would be the criteria used and by whom?

84 Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Yes

Please explain your answer:

Agreed - we have been concerned for many years about the amount of development in our part of the country which is known to be a water stress area, but this does not seem to be taken into consideration when granting developments.

85 Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Yes

Please explain your answer:

Yes - address the leaks in the system, with water companies having robust targets to address this.

86 Do you have any other suggestions relating to the proposals in this chapter?

No

Please explain your answer:

## Chapter 10 – Changes to local plan intervention criteria

87 Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Not Answered

Please explain your answer:

N/A

88 Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Not Answered

Please explain your answer:

N/A

## Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

89 Do you agree with the proposal to increase householder application fees to meet cost recovery?

Not Answered

Please explain your answer:

N/A

90 If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

Not Answered

If Yes, please explain in the text box what you consider an appropriate fee increase would be. :

N/A

91 If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Not Answered

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.:

N/A

92 Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your answer:

N/A

93 Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your reasons and provide evidence on what you consider the correct fee should be:

N/A

94 Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

Not Answered

Please explain your answer:

N/A

95 What would be your preferred model for localisation of planning fees?

Not Answered

Please give your reasons in the text box below:

N/A

96 Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

Not Answered

If Yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development? :

N/A

97 What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

Please explain your answer:

N/A

98 Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Not Answered

99 If Yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Please explain your answer:

N/A

100 What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Please explain your answer:

N/A

101 Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

Please explain your answer :

N/A

102 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer.:

N/A

## Chapter 12 – The future of planning policy and plan making

103 Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

Not Answered

Please explain your answer:

N/A

104 Do you agree with the proposed transitional arrangements?

Not Answered

Please explain your answer:

N/A

105 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

N/A

## Chapter 13 – Public Sector Equality Duty

106 Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

Please explain your answer:

N/A

## Chapter 14 – Table of questions

## Chapter 15 – About this consultation