

# Planning Committee

13 September 2024

Agenda item number 11

## Proposed new NPPF- briefing and proposed response to the consultation

Report by Planning Policy Officer

---

### Summary

The new Government is consulting on amendments to the National Planning Policy Framework (NPPF). These are summarised, with some commentary provided. At the end of the report is the proposed response to the consultation.

### Recommendation

To note the report and endorse the nature of the proposed response.

---

## Contents

1.	Introduction.....	2
2.	Summary of the main proposed amendments. ....	2
	Standard method for assessing local housing need .....	2
	Five-year housing land supply .....	4
	Green Belt .....	5
	Local character and design coding .....	7
	Presumption in favour of sustainable development .....	8
	Strategic planning.....	8
	Affordable housing.....	9
	Supporting economic growth and clean energy.....	10
	Infrastructure .....	11
	Intervention, fees and transitional arrangements.....	11
	Appendix 1 – Proposed response to the NPPF consultation .....	14
	MHCLG – amended NPPF .....	14
	Proposed response .....	14

# 1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.
- 1.3. Two documents make up the consultation:

Supporting document explaining the proposals: [Proposed reforms to the National Planning Policy Framework and other changes to the planning system](#)

Draft NPPF with proposed amendments marked up: [National Planning Policy Framework: draft text for consultation](#)

# 2. Summary of the main proposed amendments.

- 2.1. The following is a summary of the main points. It is taken mostly from a Planning Resource article entitled '47 things you need to know about Labour's proposed NPPF revisions' dated 31 July 2024. Some commentary is provided in italics.

## Standard method for assessing local housing need

1. **The draft NPPF, at new paragraph 62, directs that strategic policies should be informed by a local housing need assessment conducted using the government's standard method. The changes propose to remove reference to the method being 'an advisory starting point'. They also propose to remove reference to the ability of councils to use 'exceptional circumstances' to argue for the use of alternative approaches to assess need.** "Removing these opt outs will stop debates about the right number of homes to plan for and support authorities to get on with plan making," the [consultation document accompanying the new draft NPPF](#), says. So, the draft establishes the standard method as mandatory, and the government says local planning authorities (LPAs) would be required to plan for the resulting housing need figure, planning for a lower figure only when they can demonstrate "hard constraints" and that they have exhausted all other options.

*It should be noted that the Standard Method for Housing does not apply to the Broads. This has been the case since its introduction and is continued. This is probably because data is not available for the Broads.*

2. **Authorities would be able to justify a lower housing requirement than the standard method figure on the basis of local constraints on land and delivery, such as existing National Parks, protected habitats and flood risk areas, the consultation document explains. But they would have to evidence and justify**

their approach through local plan consultation and examination, it states. "All local planning authorities will need to demonstrate they have taken all possible steps, including optimising density, sharing need with neighbouring authorities and reviewing green belt boundaries, before a lower housing requirement will be considered," the document says.

3. **Wording changes are proposed to instruct authorities to "meet an area's identified housing need"**. This is in comparison with the previous wording in paragraph 60, which instructed councils to "meet as much of an area's identified housing need as possible". Changes are also proposed to remove the word 'sufficient' in the context of providing for housing in paragraph one.

*Member will recall a recent update on housing figures for the emerging Local Plan for the Broads. Following two calls for sites which resulted in no suitable residential sites coming forward, the Local Plan currently contains one allocation. Adding that to the completions and permissions, the Authority is around 60 dwellings short of meeting the need. There will be one or two more monitoring periods where windfall permissions and further completions will be subtracted from the residual need. We will also undertake a call for sites as part of the Publication Local Plan. But it could be that we go into the examination short on the need.*

4. **A revised standard method is proposed which replaces the current four-step model with a new two-step approach.** The new method, which would be set out in guidance, is explained in the consultation document. The revised approach would set a baseline as a first step and add in an affordability multiplier as a second step. The last steps of the existing method - capping the figure (at 40 per cent above either the previous local plan figure or the projection-derived baseline) and adding the urban uplift - are proposed to be removed.
5. **The first step - setting the baseline through calculating the existing housing stock - is designed to replace the use of household projections.** "Housing stock is more stable and predictable than household projections and does not vary significantly over time," the consultation document says. The method proposes using 0.8 per cent of existing housing stock in each local planning authority as the baseline starting point using dwelling stock estimates by local authority district. "On average, housing stock has grown nationally by 0.89 per cent per year over the last 10 years," the document says. "Using a figure of 0.8 per cent therefore provides a level of increase in all areas that is consistent with average housing growth over time, a baseline which banks the average status quo level of delivery, to then be built on through affordability-focused uplifts."
6. **The government proposes to continue to use affordability ratios as the second step in the method.** However, it proposes to increase the significance of affordability by revising the affordability adjustment. The baseline stock figure would be adjusted upwards in areas where house prices are more than

four times higher than earnings. For every one per cent above that 4:1 ratio, the multiplier would increase 0.6 per cent, compared to the current multiplier of 0.25 per cent. Secondly, it proposes to use average affordability over the three most recent years for which data is available. Using an average, the consultation document says, “will help smooth out changes in affordability and will provide further stability and certainty in inputs and outputs of the method.” The consultation also seeks views on how rental affordability could be reflected in the model.

7. **The proposed new method would result in a lower need figure for London but would increase targets across all other regions relative to the existing standard method.** The consultation documents include a [spreadsheet](#) outlining the result of the method for all regions and authorities. This shows that the new formula increases targets by more than 30 per cent across mayoral combined authorities.

*Looking at what this means for the housing need of our districts, all see an increase as shown in the following tables:*

Joint Plan Area	Region	Current Method	Proposed Method
Broadland; Norwich; South Norfolk	East of England	1,929	2,647

Reorganised Authority Name	Region	Current Method	Proposed Method
East Suffolk	East of England	905	1,696

Local Authority Name	Region	Current Method	Proposed Method
North Norfolk	East of England	556	943
Great Yarmouth	East of England	354	569

### Five-year housing land supply

8. **Changes made to the five-year housing land supply policy in December 2023 - including the ability to show a four rather than five-year housing land supply in certain cases - are proposed to be reversed.** The requirement for local planning authorities to include a buffer of five per cent on top of their five-year housing land supply, is proposed to be reintroduced “to ensure choice and competition in the market for land”. This would be added to all five-year housing land supply calculations in decision-making and plan-making, it says. The consultation document seeks views on whether five per cent is an appropriate buffer or whether it should be a different figure.

9. **The changes also propose to remove the wording on past oversupply in paragraph 77, which was introduced to set out that previous over-supply could be set against upcoming supply.** “Given the chronic need for housing we see in all areas, we should celebrate strong delivery records without diluting future ambitions,” the consultation document says.
10. **The draft also proposes to remove the option for LPAs to ‘fix’ their five-year housing land supply through annual position statements.** The consultation document says this is “a policy that has been little used”. Any authority with sufficient evidence to confirm its forward supply through this process, it says, “should in any case be able to demonstrate a five-year housing land supply”.

*We do produce a five-year land supply statement each year as part of the Annual Monitoring Report. Some years we have a five-year land supply and some years we do not. That being said, the consequence of not having a five-year land supply of the presumption in favour of sustainable development does not apply to the Broads.*

## Green Belt

11. **The draft says LPAs should undertake a green belt review where they are unable to meet housing, commercial or other needs without altering green belt boundaries.** “Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing, commercial or other development through other means”, new wording in new paragraph 142 states. “In these circumstances, authorities should review green belt boundaries and propose alterations to meet these needs in full, unless the review provides clear evidence that such alterations would fundamentally undermine the function of the green belt across the area of the plan as a whole,” it states.
12. **The draft introduces the concept of ‘grey belt’ land within the green belt.** It defines this in the glossary of the NPPF as ‘land in the green belt comprising previously developed land and any other parcels and/or areas of green belt land that make a limited contribution to the five green belt purposes’. Land of environmental value would be excluded from the definition, as would be assets of particular importance. The government seeks views on whether additional exclusions are necessary, such as areas that become of particular importance for biodiversity.
13. **The government proposes that, in making this assessment, land which makes a limited contribution to green belt purposes will not strongly fulfil any green belt purpose.** It will also have at least one of the following features:
  - Land containing substantial built development or which is fully enclosed by built form;
  - Land which makes no or very little contribution to preventing neighbouring towns from merging into one another;

- Land which is dominated by urban land uses, including physical developments
  - Land which contributes little to preserving the setting and special character of historic towns.
14. **The government proposes a sequential test to guide green belt releases.** Under this approach, outlined in additional wording in new paragraph 144, councils would give first consideration to previously developed land within the green belt, before moving on to other grey belt sites, and finally to higher performing green belt sites where these can be made sustainable. The changes state that the release of land should not be supported where doing so would fundamentally undermine the function of the green belt across the area of the plan as a whole.
15. **Where an LPA cannot demonstrate a five-year housing land supply or delivery in the LPA is less than 75 per cent against the Housing Delivery Test, or where there is unmet commercial or other need, development on the green belt will not be considered inappropriate,** the consultation document proposes. This is on the proviso that the development is on sustainable 'grey belt' land, where 'golden rules' for major development are satisfied, and where development would not fundamentally undermine the function of the green belt across the area of the plan as a whole.
16. **The following 'golden rules' would be applied to major development on land released from the green belt, to ensure it benefits both communities and nature (set out in additional wording to new paragraph 147 and in new paragraph 155):**
- In the case of schemes involving the provision of housing, at least 50 per cent affordable housing, with an appropriate proportion being social rent, subject to viability;
  - Necessary improvements to local or national infrastructure,
  - The provision of new, or improvements to existing, local green spaces that are accessible to the public. Where housing development is involved, new residents should be able to access good quality green spaces within a short walk of their homes, whether through onsite provision or through access to offsite facilities.
17. **Any development released from the green belt must bring benefits, via not only mandatory biodiversity net gain,** but also through new rules that will secure improved access to good quality greenspace.
18. **The government is seeking views on setting indicative benchmark land values for land released from or developed in the green belt to inform LPA policy development.** Regarding the provision of green space, new paragraph 156 says

development proposals should meet local standards where these exist in local plans, and national standards relevant to development where there are no local standards are in place.

19. **Development proposed on previously developed land in the green belt, and limited infilling in the green belt, would be classed as ‘not inappropriate development’,** under the proposed changes.

#### Local character and design coding

20. **Paragraph 130 of the previous NPPF, which was added to state that local character can be taken into account when councils consider their ability to meet their housing needs, is proposed to be deleted in its entirety.** The new draft proposes strengthening expectations that plans should promote an uplift in density in urban areas. “By restricting density, the existing policy is likely to have longer term negative impacts on achieving sustainable patterns of development and on meeting expectations on future housing supply,” the consultation document says.
21. **Rather than district-wide design coding, the government proposes to focus on the preparation of localised design codes, masterplans and guides “for areas of most change and most potential”.** These, it says, include regeneration sites, areas of intensification, urban extensions and the development of large new communities. Wording changes to new paragraph 135 state that the National Model Design Code is “the primary basis for the preparation and use of local design codes” and removes the preference in the previous NPPF for the preparation of local design codes being the primary means for assessing and improving design of development.
22. **Changes made in 2023 to the NPPF that reference “beauty” and “beautiful” in relation to well-designed development are proposed to be reversed, with the word removed from the title of chapter 12.** The consultation document also says the current NPPF wording on upwards extensions places “a disproportionate emphasis on one type of upwards extension development”. The draft proposes to clarify that national policy is strongly supportive of all upward extensions, including mansard roofs.

*Design continues to be a key consideration in the Broads, which is a protected landscape. A Design Guide is still being produced.*

23. **An amendment proposed to the existing NPPF would reinforce the expectation that development proposals for homes and other identified needs on suitable brownfield land within settlements are viewed positively.** The additional wording - to new paragraph 122 - states that such proposals “should be regarded as acceptable in principle.” This, the consultation document says, makes clear that the default answer to brownfield development should be yes.

24. **The consultation seeks views on whether the definition of previously developed land should be expanded to include hardstanding and glasshouses.** “We want to understand how expanding this definition might affect the availability of horticultural land,” the consultation document says.

#### Presumption in favour of sustainable development

25. **The document changes the presumption in favour of sustainable development by clarifying what policies are ‘most important’ in the assessment of housing schemes.** This, the government’s consultation document says, is to “bring clarity” to debates over what policies are most important in such decisions. The changes proposed to paragraph 11 of the draft NPPF state that these are **policies “for the supply of land”**. A new footnote explains further that these are policies **“which set an overall requirement and/or make allocations and allowances for windfall sites for the area and type of development concerned.”**
26. **In a further proposed change to the presumption, the draft framework adds explicit reference to the need to consider policies “for the location and design of development” and “for securing affordable homes”, when the presumption is engaged.** The government said it had “heard concerns that some developers have used the presumption to promote low quality, unsustainable development”. “We are clear that the presumption cannot offer a route to creating poor quality places”, the government says, and so is proposing the additional references in the presumption.

#### Strategic planning

27. **The draft proposes new mechanisms for cross-boundary strategic planning, including short-term measures to strengthen cross-boundary cooperation ahead of introducing formal strategic planning mechanisms through new legislation.** “It is our intention to move to a model of universal strategic planning covering functional economic areas within the next five years,” the document says. “Effective strategic planning across LPA boundaries will play a vital and increasing role in how sustainable growth is delivered and key spatial issues, including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience, are addressed,” additions to paragraph 24 state.
28. **Local planning authorities and county councils “continue to be” under a duty to cooperate with each other, the draft NPPF says.** Paragraph 25 sets out the relevant bodies for collaboration on strategic plans, with reference to local enterprise partnerships proposed to be deleted. The consultation document says the government will take steps necessary to enable universal coverage of strategic planning within this Parliament. “This will support elected mayors in overseeing the development and agreement of spatial development strategies (SDSs) within their areas”, the document says. The government will also



explore the most effective arrangements for developing SDSs outside of mayoral areas, “in order that we can achieve universal coverage in England, it says.

29. **Once the matters for collaboration have been identified, new paragraph 27 states that authorities “should make sure that their plan policies are consistent with those of other bodies** where a strategic relationship exists on these matters, and with the relevant investment plans of infrastructure providers, unless there is clear justification to the contrary”. In particular, plans should ensure that:

- a consistent approach is taken to planning the delivery of major infrastructure;
- unmet development needs from neighbouring areas are accommodated; and
- any allocation or designation which cuts across the boundary of plan areas “is appropriately managed by all relevant authorities.”

Changes to new paragraph 28 acknowledge that plans come forward at different times and that there can be a degree of uncertainty over other plans. In such circumstances, it states, those preparing plans “will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.”

*We work closely with our relevant districts. The Norfolk Strategic Planning Framework is in place and sets out agreements that cover various different strategic matters. Separate conversations are ongoing with East Suffolk.*

30. **The government will identify priority groupings of other authorities where strategic planning - in particular the sharing of housing need requirements - would provide particular benefits.** This will include “setting a clear expectation of cooperation that we will help to structure and support this, and to use power of intervention where necessary,” the consultation document says.

31. **The consultation document asks whether the tests of soundness should be amended to better assess strategic scale plans or proposals.** This is noting concerns that plans containing such proposals can require implementation over a long period, making it more difficult to provide evidence of deliverability and viability. “We want the planning system to enable such long term and ambitious planning, while recognising that such plans need to be grounded and realistic,” the consultation document says.

### Affordable housing

32. **The draft NPPF sets an expectation that housing needs assessments explicitly consider the needs of those requiring social rent** and that authorities specify their expectations on social rent delivery as part of broader affordable housing

policies. Reference is also added in the new draft to assessing the needs of 'looked after children', which a footnote says can be evidenced in the relevant LPA's Children's Social Care Sufficiency Strategy.

33. **The requirement to deliver at least ten per cent of the total number of homes on major sites as affordable home ownership, as set out in paragraph 66 of the current NPPF, is proposed to be removed.** The government also proposes removing the requirement that a minimum of 25 per cent of affordable housing units secured through developer contributions should be First Homes.
34. **New wording is proposed in paragraph 66 that expects LPAs to take a positive approach to development proposals that have a mix of tenures and types,** through both plans and decisions. New paragraph 69 states that mixed tenure sites can provide a range of benefits "including creating diverse communities and supporting timely build out rates". LPAs, it says, "should support their development through their policies and decisions."
35. **The consultation seeks views on the most appropriate way to promote high percentage social rent/affordable housing developments.**
36. **The consultation seeks views on measures to strengthen small site policy through the NPPF,** and whether the ten per cent small site allocation policy should be required in all cases.

#### Supporting economic growth and clean energy

37. **Councils should identify appropriate sites for commercial development "which meet the needs of a modern economy", additions to new paragraph 84 state.** These include, it says, "suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure and freight and logistics". The government is also seeking views on whether digital infrastructure should be enabled to opt into the Nationally Significant Infrastructure Projects regime.
38. **Planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure to support the growth of knowledge and data-driven, creative or high technology industries,** including data centres and grid connections, an addition to new paragraph 85 states. The draft also says storage and distribution operations should be provided for "that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation". The same paragraph also includes new text that provision should be made for "the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience."
39. **The government is proposing that onshore wind is re-integrated into the NSIP regime.** It is also proposing to set the threshold at which onshore wind projects are determined as nationally significant at 100 megawatts; and increase the same threshold for solar projects to 150 megawatts.

*As a result of this, a criteria-based policy is proposed, and this will be discussed at the next Planning Committee.*

40. **The government is also proposing amendments to existing paragraph 163 (in new paragraph 164) of the NPPF to direct decision-makers to give “significant weight” to the benefits associated with renewable and low carbon energy generation, and proposals contributing to meeting a net zero future.** The amendments also seek to set a stronger expectation that authorities proactively identify sites for renewable and low carbon development when producing plans, where it is likely that in allocating a site, it would help secure development.

### Infrastructure

41. **The government proposes adding to wording in NPPF paragraph 98 to make clear that “significant weight” should be placed on the importance of facilitating new, expanded or upgraded public service infrastructure when considering proposals for development.** It also proposes to incorporate reference to post-16 education places to the existing NPPF to support the delivery of this type of education provision. Reference to early year places is also proposed to be included in this paragraph.
42. **The government will not be implementing the Infrastructure Levy as introduced in the Levelling-Up and Regeneration Act 2023.** As part of improving the existing system of developer contributions, it will look to set clear planning policy requirements on green belt land.
43. **The government is taking what it calls a ‘vision-led’ approach to transport planning, focusing on the outcomes desired.** To support this approach, it is proposing to make amendments to paragraphs 114 and 115 of the existing NPPF.
44. **The government is seeking views on how national planning policy could better support local authorities in promoting healthy communities and in tackling childhood obesity.** The planning system should deliver community needs to support society and the creation of healthy places, the consultation document says.

### Intervention, fees and transitional arrangements

45. **The government is also floating changing the criteria for local plan intervention.** It is proposing that LPAs that fail to do what is required to get their plan in place, or keep it up to date, would be at risk of government intervention. It proposes that decisions on intervention should have regard to local development needs; sub-regional, regional and national development needs; or plan progress.

46. **It proposes to increase some planning fees, including for householder applications**, “so that local planning authorities are properly resourced to support a sustained increase in development and improve performance”. For example, the current fee for householder applications is £258. However, the government states that the costs to local planning authorities to process these applications is significantly higher. This has an impact on the resourcing of local planning authorities, as for most, householder applications represent the greatest proportion of applications received. We therefore propose that the fee for householder applications should be increased to meet cost recovery levels. It estimates that, to meet broad cost recovery levels, householder application fees should be increased to £528.

There is also a proposal being discussed as to whether local planning authorities should set their own fees with an option to have some flexibility around central government guidelines.

47. **Annex 1 of the draft NPPF sets out the following proposed transitional arrangements, which the government says are designed to maintain the progress of plans at more advanced stages of preparation.**
- **Plans at examination would continue to be examined under the version of the NPPF they were submitted under.** However, if the revised local housing need figure is more than 200 homes per annum higher than the figure in the adopted version of the plan, upon introduction of the new plan-making system, the LPA would be required to begin preparation of a plan under the new system as soon as possible.
  - **Those plans that have reached Regulation 19 publication stage but have not yet been submitted for examination one month after the revised framework is published, with a gap of no more than 200 homes per annum between the LPAs’ revised LHN figure and its proposed housing requirement, should also progress to examination under the version of the NPPF the authority has used when preparing the plan thus far.** However, those with a more significant gap of over 200 homes per annum between the two figures will need to revise their plan in line with the revised NPPF before submitting the plan for examination no more than 18 months after the publication of the revised NPPF. Where this requires LPAs to undertake unforeseen additional work and reopen engagement with communities, the government will provide direct funding support to help these authorities progress their plans to examination quickly.
  - **All plans at earlier stages of preparation should be prepared against the revised version of the NPPF.**

- Where there is an 'operative' SDS in place that is less than five years old, this will continue to provide the housing requirement for relevant emerging plans.
- The government says it plans to implement the new plan-making system as set out in the LURA from summer or autumn 2025. All current system plans that are not subject to the transitional arrangements will need to be submitted for examination under the existing system no later than December 2026 (this amounts to an 18 month extension on the previous 30 June 2025 deadline).
- *We still intend for the Local Plan to be submitted in Summer 2026. That would mean a consultation on the next version of the Local Plan starting February at the latest. We will have to wait for confirmation of the transition arrangements as well as the arrival of the new NPPF to understand the impacts. We will keep Members informed.*

Author: Natalie Beal

Date of report: 27 August 2024

Appendix 1 – [Proposed response to the NPPF consultation](#)

# Appendix 1 – Proposed response to the NPPF consultation

## Ministry of Housing, Communities & Local Government – amended NPPF

**Document:** [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system)

**Due date:** 24 September 2024

### Proposed response

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

There are thousands of houses that have permission but are not built out. In the Broads area there are two schemes totalling 82 dwellings that have had permission for a number of years, but not been built out. The housing need for the Broads is low, at around 20 or so a year, but the point is, that is four years' worth of housing need that is permitted, that is not being built out. Ramp that up for areas with larger housing need and there are a significant number of dwellings that could be built but are not being built. It is not clear what the Government is going to do to get developers to build the sites that they get permission for.

#### **Question 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?**

We are a protected landscape with many constraints. We have undertaken two calls for sites for residential dwellings and no suitable sites have come forward. If sites do not come forward and we do not own land, how can small sites be allocated in Local Plans?

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

Supporting green energy is fine, but you need to reduce the demand for energy in the first place by making new homes and existing homes more energy efficient. The Future Homes standard needs to be improved to reflect the various concerns that industry experts have about it and the Government needs to retrofit existing dwellings and buildings. The Written Ministerial Statement relating to energy efficiency standards being set in Local Plans also needs to be assessed.

#### **Question 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?**

In terms of peat being protected or there being compensatory mechanisms in place, it is important to note that peat occurs only in a few places in the lowland landscape, it takes an extremely long time to form and can be destroyed irreparably in a few short years of inappropriate drainage, cropping and through development. So, it is not clear what compensatory measures could be put in place if peat is excavated as a by-product of

development – if it dries out, it becomes a carbon source, so how can that be compensated for sensibly given the thrust of the section is about emissions and climate change? We advocate that paludiculture could be employed in certain existing degraded areas of lowland agricultural peat where, with the right incentives, energy crops could be grown at raised watertables that protects the peat resource and enhances nature.

The CO<sup>2</sup> emissions from maintaining drainage in peatland systems likely outweighs the benefits of renewable energy development on those sites, so there should be a general presumption against such development.

Consideration should also be given to whether the development will block rewetting of peatland across a wider catchment – for instance, a solar installation adjacent to currently drained land within a linked drainage system, could increase the cost of raising water levels on the neighbouring land. This can be a challenge where certain lowland areas have been deep drained and lost all their peat, whereas more sustainably managed neighbouring fields still have significant peat reserves.

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

#### *Mitigation*

Ensure the future home standard using energy efficiency as its primary metric, focusing on Passivhaus type standards where applicable. The current focus on a Target Emission Rate does not make sense in a move to a zero-carbon grid by 2030, and potentially allows substandard energy inefficient houses to be built hiding behind the decarbonisation of the grid.

Focus on the carbon footprint of the materials used for housebuilding, which will become the majority of a house's footprint over the next few years. Planning Policy should support novel building materials that reduce these footprints. There is a scope to support a national biomass strategy, with encouraging the use of products made from wetland biomass to combine peatland rewetting with sustainable housing (Paludiculture).

#### *Adaptation*

We are concerned that policies do not currently take into account the risks of heat to health. The aging population in and around the Broads will be particularly vulnerable to this, and poor-quality design and build will expose people to lethal levels of overheating in the worst climate change projections.

**Question 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?**

Basic Carbon accounting measures exist and can be used. The NPPF needs to set out a standard that authorities can use without risk of challenge and needs to be coupled with funding to support training for officers in planning departments. Small planning authorities

like the Broads Authority do not have the resources to verify the standards chosen by developers are adequate and have been completed correctly.

As per the answer to question 78, there needs to be scope for novel materials where the full lifecycle has not yet been established but offer promise in reducing the overall footprint of the housing supply chain.

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

The NPPF does not seem to refer to the recent court ruling that decision-makers must consider projects' 'downstream' environmental impacts and perhaps it needs to.

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

If the text is not clear in terms of how to assess and weigh, as set out in paragraph 21 of this chapter, then the NPPF/NPPG perhaps needs to set out ways to assess and weigh rather than removing the text.

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

Not much land around England is classed as 3a. This could be because there might not be much land of that quality, or that an assessment has not taken place or that the information is on paper maps and not digitised and made available. This needs to be checked.

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

Should building regulations be amended to reduce water consumption per head to lower than 125 l/h/d throughout the country? At the moment the level is 125 l/h/d and 110l/h/d is an optional requirement if it can be justified to include in Local Plans. Given what is said in this section should the required level come down to 110l/h/d or lower and the optional be lower than what it is currently set? Also see this document; will measured be enacted as set out within it? [Summary of responses for the consultation on measures to reduce personal water use \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674447/summary_of_responses_for_the_consultation_on_measures_to_reduce_personal_water_use.pdf)

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

No.

**Question 90 : If no, 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.**

The increase suggested is substantial but a 50% increase would be more achievable.

**Question 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?**



No – it should be lower than £528.

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

No comment on how they are presented, but we need to see the national development management policies ASAP and ensure they are out for consultation soon. The Broads is a protected landscape, and it is unlikely that a one size fit all policy will be appropriate.

**Question 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?**

The issues are highlighted within the above commentary, there are no further points we would like to make.