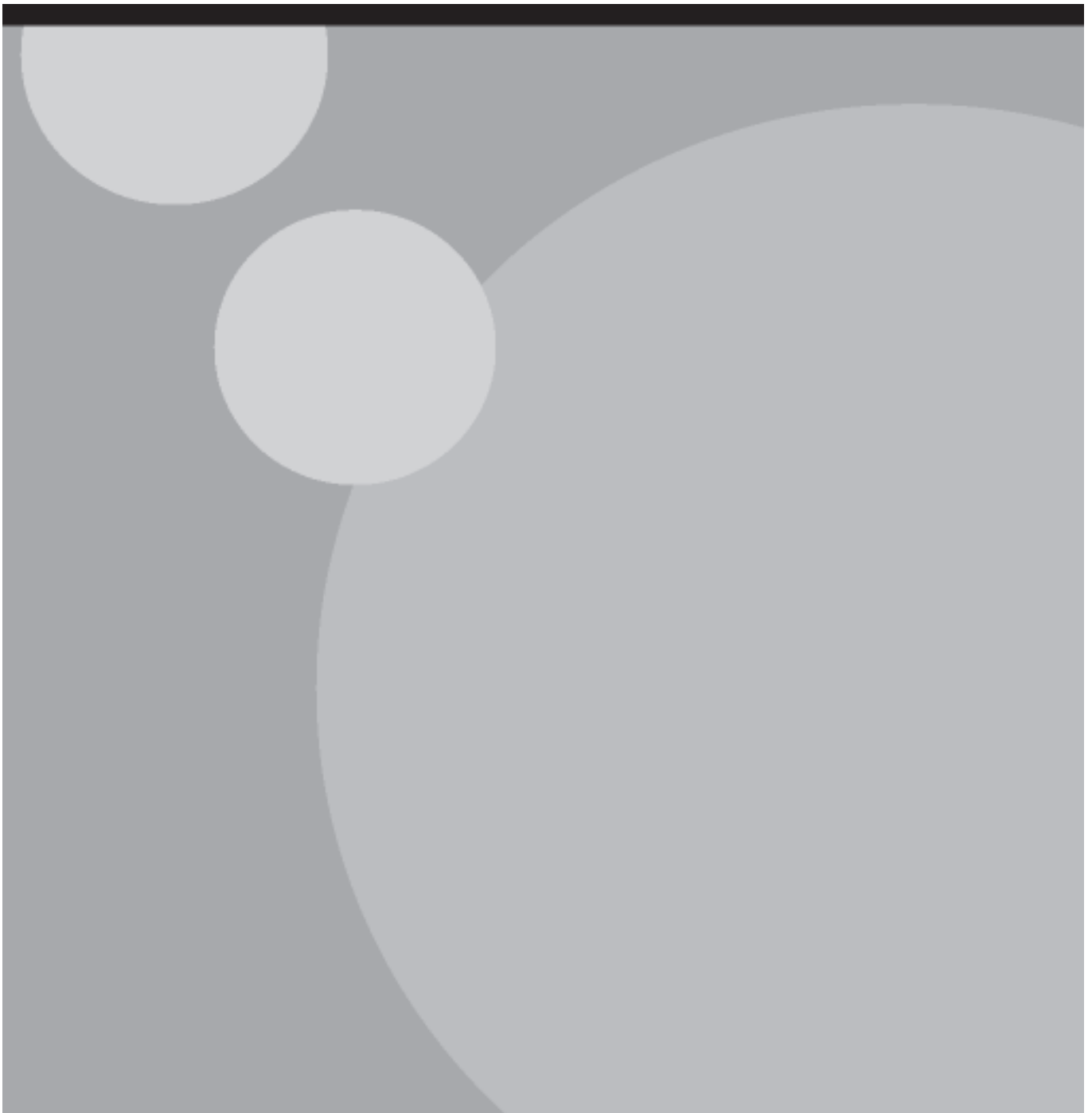




National Planning Policy Framework

Summary of consultation responses





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July 2012
Department for Communities and Local Government

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1. Overview

The draft National Planning Policy Framework (the Framework) was published on 25 July 2011. The consultation closed on 17 October 2011. We received over 16,000 responses to the consultation. Respondents addressed some or all of the questions set out in the consultation paper, offered comments on the draft policies, and in some cases made specific suggestions for revised wording.

Of the responses received, over half were from nine campaigns. We have also received an e-petition with over 100,000 signatures, and the National Trust also collected over 228,000 signatures for their campaign.

In summary, the main points made through the consultation include:

- strong support for the significant simplification and consolidation of planning policy;
- some calls for stronger and more positive text on the role planning could play in unlocking investment and promoting economic growth;
- strong support for the plan-led system;
- strong support for the need for high quality design to form an integral part of the planning system;
- broad support for the requirement of a five-year supply of specific deliverable housing sites, while less supported was the proposed requirement to include an additional 20 per cent buffer of sites;
- broad support for the duty to cooperate and its importance as a vital part of strategic planning on cross boundary issues. However, some raised issues about its effectiveness as a mechanism for strategic planning;
- support for the proposition that traveller site policy should eventually be incorporated into the Framework;
- clarity on the future of supporting guidance which should be clear, concise and kept to a minimum;
- calls for clarification of the definition of sustainable development with many seeking explicit reference to the UK Sustainable Development Strategy;
- calls to clarify the balance between the three core roles of the planning system - economic, environmental and social;
- requests for greater clarity about the presumption in favour of sustainable development and its relationship to the specific policies in the Framework;

- suggestions for transitional arrangements;
- mixed views about the proposed removal of the national target for the reuse of brownfield land for housing;
- support for the current protections for matters such as heritage and recreational facilities;
- calls for strong policies on reducing greenhouse gases and mitigating and adapting to climate change; and
- request for further clarification on the relationship between Local Plans and neighbourhood plans.

2. Introduction

The consultation document published alongside the draft National Planning Policy Framework set out a number of questions on which the Government particularly sought views. It also invited wider views on the content and format of the draft Framework and the potential impacts of the changes to national policy proposed. This report also summarises responses to the question on the consistency of the draft Framework with the draft planning policy for traveller sites.

Respondents were invited to reply online using an internet survey package, or to email or post written comments to the Department for Communities and Local Government.

During the consultation process, the Department facilitated a series of workshops across the country between September and October 2010, which were publicised on the Department's website. Over 950 delegates attended 11 workshops and oral hearings.

Consultation responses

Over 16,000 responses were received to the consultation, including 7,662 individual responses (2,062 via internet survey tool). The remaining responses were from campaigns. The statistical analysis is based on the 7,662 individual responses received. A breakdown of the types of respondent is shown below.

Table 1: Responses by type of respondent

Responses by type of respondent	Number of Responses
Voluntary sector / environmental groups / housing association etc.	800 (11%)
Private individuals ¹	4,971 (65%)
Local government / parish councils / other public bodies	1,193 (15%)
National representative bodies / professional bodies	263 (3%)
Businesses / house builders	435 (6%)
Total	7,662

Campaign responses

Campaign responses were received from:

- The Campaign for the Protection of Rural England (over 4,000);
- The Royal Society for the Protection of Birds (over 2,000);
- Friends of the Earth;
- National Trust;
- Playing fields and sport;
- Campaign for Better Transport;
- The Wildlife Trusts;

¹ These responses largely reflected the issues raised by the principal campaigns

- Hartford Joint Action Group;
- Elswick, Fylde Campaign; and
- The Woodland Trust.

Petitions

The following petitions were received:

- an e-petition organised by 38 Degrees (over 100,000 signatures);
- the National Trust campaign (over 228,000 signatures);
- Cambridge Past, Present and Future (1,036 signatures); and
- a local resident in Royston, Herts (500 signatures).

Consultation questions

The summary of responses is structured around the questions asked in the consultation document and the additional question on traveller site policy. Many respondents did not respond to all the questions or made more general points. Where possible for statistical purposes, responses have been included under the question to which they best relate. We were grateful for all the responses received, including the alternative or additional text which some respondents offered. These have been given full consideration as part of the development of the final Framework.

3. Consultation responses

Delivering sustainable development

Question 1a – Does the Framework have the right approach to establishing and defining the presumption in favour of sustainable development?

Key messages included:

- Many respondents sought clarification on how the presumption in favour of sustainable development would work with the plan-led approach, with some suggesting a specific reference to the role of other material considerations.
- Many called for greater clarity on the definition of sustainable development, including seeking explicit reference to the UK Sustainable Development Strategy (and its five principles).
- Some respondents requested clarification on the status of the Local Plan, and the ability for applications contrary to the Local Plan to be refused.
- Some suggested that the presumption should apply only when considering demonstrably 'sustainable' development, and that 'non-sustainable' development could legitimately be refused permission.
- Many respondents requested clearer text in the Framework to set out that a balanced approach should be taken to economic, social and environmental issues. Some respondents also called for greater clarity about how the sustainable development principles in the Framework should be applied in practice.
- Some respondents suggested that the planning system should aim to achieve net benefits across all three dimensions of sustainable development.
- Some suggested that an expanded list of the types of development that would not constitute sustainable development should be included in the Framework, for example inappropriate development in Green Belts or on Sites of Special Scientific Interest.
- Some respondents thought the Framework's aim should be reworded to deliver 'sustainable development', not 'sustainable economic growth'.
- Various suggestions were made about excluding particular words from the presumption – for example 'silent or indeterminate', 'significantly and demonstrably' and 'out of date'.
- Many respondents suggested that language about the default answer to development being 'yes' was unnecessary to meet the aims of the Framework.
- Some respondents objected to the way they felt the presumption put the onus on the local planning authority and objectors to demonstrate why a development should not proceed.

The Government has sought to respond positively to the comments and suggestions made about the definition of sustainable development. We have amended the definition to make reference to both the longstanding Brundtland report and to the five guiding principles set out in the 2005 UK Sustainable Development Strategy. The Framework has also been revised to indicate more clearly that sustainable development is the primary purpose of the planning system.

The policies in the Framework reflect the Government's views of how the principles of sustainability should be applied in preparing local and neighbourhood plans and in making planning decisions. We have amended the Framework to be clear that the economic, social and environmental roles of the planning system should not be pursued in isolation, because they are mutually dependent. We have also been clear that local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three.

We have ensured that the Framework is clear that plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas.

The presumption in favour of sustainable development has been retained in the final document, as the basis for a positive approach to both plan-making and decision-taking. We have made clear that the presumption in favour of sustainable development operates within the context of statutory requirements to make decisions in accordance with the development plan, unless material considerations indicate otherwise. Revisions have also been made to indicate more clearly the circumstances in which it may be appropriate for development to be restricted if it would not be sustainable.

The Government has looked carefully at the terminology used in the Framework in light of comments to ensure that the terms are consistent and are used appropriately. The words 'default answer is yes' have been removed from the Framework; this language has given rise to unwarranted concerns that development should be allowed to proceed at all costs, which was never the intention of government policy. However, the Government remains committed to ensuring that the planning system does everything it can to support economic growth.

We have also revised the Framework to be clear that economic growth will not be at the expense of the countryside and heritage that we value. We have ensured that strong protections for Green Belt, National Parks and other important areas are retained and strengthened the policy on the use of brownfield land.

Some respondents commented that the presumption puts the onus on the local planning authority and objectors to show why a development should not proceed. It is an established principle of the planning system that applications should only be refused if there are justifiable planning reasons for doing so. We have, therefore, maintained this approach in the final Framework.

Plan-making

Question 2a – Has the Framework clarified the tests of soundness, and introduced a useful additional test to ensure Local Plans are positively prepared to meet objectively assessed need and infrastructure requirements?

Key messages included:

Local Plans

- There was broad support for the test of soundness. The plan-led approach was felt to be sensible and proportionate, with decisions based on local circumstances, market signals and land prices. Respondents largely agreed that up-to-date plans increased certainty for local councils, businesses and their communities. Some developers highlighted the importance of a plan-led system in bringing forward appropriate development.
- Many respondents asked for the term 'Local Plans' to be defined in the Framework.
- Some respondents felt there should be more emphasis in the Framework on the scope and purpose of Local Plans, including setting out a long-term vision and spatial place-shaping for an area. Business respondents also supported the policy for positively prepared plans that set out a long-term vision for the area.
- A small number of respondents felt the Framework could have taken the opportunity to provide a spatial plan for England as a whole.
- There was broad support among respondents for involving all sectors of the community in preparing Local Plans.
- Many respondents welcomed the 'positively prepared' test as part of the test of soundness, in particular for plans to be both deliverable and viable.
- A number of respondents believed that supplementary planning documents have an important role to play in the planning process, for example in handling issues such as design or biodiversity and that the Framework should reflect this.
- Many respondents welcomed the requirement for local planning authorities to use a clear evidence base for their plans and to take full account of infrastructure, housing and business needs.
- Many made the point that evidence requirements should be realistic and proportionate, allowing plans to be found sound at examination in public.

Neighbourhood planning

- Many respondents requested greater clarity about the relationship between Local Plans and neighbourhood plans, including the process for updating a Local Plan where a neighbourhood plan is already in force.
- Clarity was also sought on how to manage neighbourhood plans where the Local Plan is out of date.

Viability

- Some respondents argued that the viability test should be clarified to ensure that development does not place an unacceptable burden on local infrastructure or the environment.
- Some disagreed that assessment of "acceptable returns" was the right approach to apply.

- Some said that the viability assessment should not remove the need for essential environmental infrastructure.

Implementation

- Many respondents argued for appropriate transitional arrangements, recommending that councils be given time in order to update and develop their Local Plans. Conversely, there were others who maintained that no transition period was appropriate
- Some respondents did not want transitional arrangements to cause delays in implementing planning reform.
- Many respondents felt that the presumption in favour of sustainable development should act as an incentive for councils to get up-to-date plans in place.
- Many argued that existing plans should retain their status and not be rendered invalid by the Framework.
- A number of respondents sought clarity on how the certificate of conformity would work in practice.

Local Plans

The Government is committed to reinforcing the plan-led system, given the certainty it provides to local communities and businesses. Strong community engagement is an essential ingredient in the planning system and decisions should be taken at the most local level possible.

The final Framework retains key messages on the need for plans to be sound - including that they are justified, effective, and based on proportionate, robust and up-to-date evidence which is capable of being successfully tested at examination in public.

It will be for councils, alongside their local community, to determine their Local Plan, while having regard to the need to be consistent with the policies in the Framework. The Framework is clear that supplementary planning documents may be used where they can help applicants make successful applications or aid infrastructure delivery, but should not add unnecessarily to the financial burdens on development. The final Framework includes a glossary definition for Local Plans.

It was not the Government's intention to produce a spatial plan for England. The Government is clear that local areas should be able to set local policies that reflect their local circumstances and enable them to respond to the different opportunities for achieving sustainable development in their areas.

Neighbourhood planning

In updating the Local Plan, councils should take account of any existing plans in the local area, including any neighbourhood plans. The Framework and the Localism Act are clear that neighbourhood plans need to be in general conformity with the strategic policies of the existing development plan for the local area, and the Framework sets out a list of those strategic policies.

The approach to be taken by a decision-maker where policies in a neighbourhood plan conflict with another policy in the development plan is set out in primary legislation (Section 38(5) of the Planning and Compulsory Purchase Act 2004). The

Framework has been revised to clarify the approach where policies in a development plan, such as between a neighbourhood plan and a Local Plan, are in conflict.

Where neighbourhood planning is undertaken before an up-to-date Local Plan is in place, we would expect local councils and neighbourhoods to work together to produce complementary plans.

Viability

The Government is clear that viability consideration should not lead to unsustainable development being granted planning permission. To avoid any ambiguity on this point, the final Framework makes clear that where safeguards are necessary to make a particular development acceptable in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measure required cannot be secured through appropriate conditions or agreements. We have also considered the points raised on the term “acceptable returns” and concluded this could be more clearly expressed as “competitive returns”.

Implementation

It has always been the Government’s intention that councils who have done the right thing and either adopted, or have made good progress towards adopting Local Plans, will not be disadvantaged by the change to new policy.

The final Framework makes clear that the policies in the Local Plan should not be considered out-of-date simply because they were adopted before the Framework was published. For the first 12 months, policies in plans adopted since 2004 continue to carry full weight even if there is a limited degree of conflict with the Framework.

The final Framework also makes clear that due weight should be given to all policies in existing plans, depending on how consistent they are with the Framework. Decision-takers may also give weight to emerging plans depending on the stage of preparation, the extent of any unresolved objections and the degree of consistency with the Framework.

These arrangements reflect the consultation feedback. We have also put in place a package of advice and support from the Local Government Association, the Planning Inspectorate and the Department for Communities and Local Government from day one and free of charge to assist councils in considering the need to update their Local Plans and taking forward efficient and effective reviews.

Joint working

Question 2c – Do the policies for planning strategically across local boundaries provide a clear Framework and enough flexibility for councils and other bodies to work together effectively?

Key messages included:

- The duty to cooperate was welcomed by many respondents as being a vital part of strategic planning on cross boundary issues, such as transport, housing and infrastructure delivery.
- Many respondents commented that the duty to cooperate would enhance strategic planning, but some said that cross boundary cooperation could, in particular cases, be challenging in practice.
- Some respondents felt that the requirement for authorities to demonstrate evidence of having successfully cooperated in planning for cross-boundary impacts (when their Local Plans are submitted for examination) could increase burdens in the plan making process.
- Some have asked for defined outputs, such as Strategic Infrastructure Assessments, to be required as evidence of cooperation between authorities.
- Guidance was requested on a wide range of matters including the issues on which authorities should cooperate, how strategic issues such as sub-national infrastructure should be addressed in practice and the actions that constitute cooperation.
- A number of respondents recommended specific guidance on how the duty to cooperate would work alongside the marine planning system.
- Some respondents asked for clarity about the evidence base for Local Plans in the context of the duty to cooperate.
- Respondents called for references to be added on the important role of Local Nature Partnerships in effective strategic planning.
- There were calls to recognise in the Framework the important role played by private bodies, such as utility companies.
- There were also requests for cooperation between councils to be extended beyond “neighbouring” authorities, and for the duty to cooperate to apply in Wales and Scotland.

The Government considers that the duty to cooperate provides a strong framework for effective cross boundary strategic planning. In particular, the Localism Act includes a new statutory requirement for authorities to demonstrate compliance with the duty to cooperate as part of the examination of Local Plans, and councils who are unable to demonstrate compliance with the duty may not have their plan found sound at examination. Cooperation needs to be a flexible process led by councils, working collaboratively with other councils and other bodies, allowing them to respond to particular issues and local circumstances and decide how best to serve their local communities, businesses and interested parties. The Localism Act gives councils flexibility rather than forcing them to produce specific documents. As before, councils will be expected to follow an evidence-based approach to plan-making.

The Government is clear that cooperation between councils on strategic planning matters will be an integral part of preparing robust policies on cross boundary issues

in local and marine plans. For Local Plans the degree of cooperation that has taken place should be evident in the strategy and policies (and supporting evidence) that form part of the draft plan tested at the examination. We do not, therefore, expect this to be an unreasonable burden on the plan-making process.

With regard to the requests for guidance, we will work closely with experts in different fields to consider carefully what guidance may be needed. The Framework sets out a list of the strategic policies for which the duty to cooperate applies.

The final Framework reflects calls to recognise the important role played by private bodies and has been amended to state that councils should work collaboratively with private sector bodies, utility and infrastructure providers. It also now recognises the important role of Local Nature Partnerships.

The duty to cooperate is a statutory requirement that applies only to England. However, we have had, and will continue, discussions with Welsh and Scottish administrations on how best to encourage our respective councils to work together on planning issues of common interest.

Decision-taking

Question 3a - In the policies on development management, is the level of detail appropriate?

Key messages included:

- Some respondents were unclear about what guidance would exist to support the proposed policies on decision-taking.
- A number of respondents asked for policy on enforcement to be included in the Framework.
- A number of respondents supported the policies on development management helping to deliver sustainable development, but some wanted a clearer statement about protecting communities from inappropriate development.
- On the issue of pre-application engagement and frontloading, respondents mainly from the public sector sought more emphasis on developer participation, citing the new pre-application duty in the Localism Act. Applicants emphasised the importance of councils, as well as statutory consultees, offering and proactively engaging in such discussions.
- Some respondents would like to see encouragement for 'parallel tracking' of applications for planning permission and other consents.
- Some argued that more emphasis should be given to the importance of local information requirements being proportionate.

The Government agrees with a number of the suggestions put forward, and has clarified the decision-taking policies in response. The legal position concerning the determination of applications has been made clearer. Greater emphasis has been placed on the importance of pre-application engagement, and on local information requirements being kept proportionate and reviewed on a frequent basis. Additional wording on enforcement has been added. Comments about the role of development

management in delivering sustainable development have been addressed through the clarifications to the opening sections of the Framework. The decision-taking section has also been made clearer in relation to the parallel processing of consents to help speed up the process.

The consultation on the draft Framework asked for views on what any separate guidance should cover, and who would be best placed to provide it. In light of the responses, we will work closely with experts in different fields to consider wider guidance requirements in order to determine what is needed (see below).

Guidance

Question 4a - Should guidance needed to support the new Framework be light-touch and be provided by organisations outside Government?

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

Key messages included:

- There were differing views from respondents over who should provide guidance to support the Framework. Many agreed that guidance needed to be light touch and kept to a minimum to avoid the current position with dozens of different documents and excessive control, and that guidance needed to be clear and concise.
- Respondents presented a number of suggestions for who should produce guidance, including government agencies and non-departmental public bodies, statutory consultees and specialist or professional organisations. They also suggested various processes for sector produced guidance, such as through a single committee, and scrutiny by the Government.
- Some respondents argued Government was the most appropriate source of guidance, because organisations outside Government may have vested interests. Some suggested that without Government intervention, there could be a lack of consistency. A small number of respondents were concerned to avoid other bodies and organisations producing excessively lengthy guidance.
- Some voiced the importance of professional bodies having resources to produce timely guidance.
- Some said councils were capable of consulting relevant agencies to secure relevant advice, and that no additional guidance was necessary.
- Many respondents considered that sector guidance should be endorsed by the Government, because it was unclear how much weight would be attached to non-government guidance.
- Some respondents said Government should identify relevant organisations to provide guidance and suggest a timetable.
- Many respondents suggested areas that should be covered by guidance. These included the duty to cooperate, housing, design, viability, historic environment and neighbourhood planning.

This Government inherited some 6,000 pages of underpinning planning guidance produced over the years, and this needs to be reviewed and streamlined. The

consultation on the draft Framework asked for views on what any separate guidance should cover, and who was best placed to provide it.

The Government will now embark on a new exercise to consider what underpinning guidance continues to be needed, involving practitioners and other interested parties. The outcome of this process will be an appropriate and easy to use set of guidance, focussing on issues that require national expression, to support implementation of the Framework. It will not always be the case that the guidance should come from Government – in some cases professional bodies may be the most appropriate bodies to publish guidance. The Government has been clear that until such time as the guidance review is complete, the existing guidance where relevant can still be used.

There are also a very limited number of instances where the consultation on the draft Framework highlighted that existing planning policy contained technical guidance which it would be helpful to retain, in particular on flooding and minerals. We have published this technical guidance alongside, but separate from, the Framework.

Business and economic development

<p>Question 5a – Will the ‘planning for business’ policies encourage economic activity and give business the certainty and confidence to invest.</p>

Key messages included:

- There was broad support for the policies on business and economic development. Some commented on the need to ensure long-term sustainable development.
- Some respondents requested more text on the role planning could play in unlocking investment and promoting economic growth.
- Some respondents, especially councils, felt that the draft Framework could offer stronger long-term protection for employment land, although others welcomed the more flexible approach for re-allocating employment land.
- Some strongly welcomed the Government’s support for rural economic development. Some suggested the need for additional policies supporting rural economic development. Others favoured allowing less economic development in rural areas, preferring it to be located in urban areas.
- Some said there should be a greater recognition of tourism as an important economic activity in its own right.
- Some sought greater recognition for the role of agriculture, forestries and fisheries in supporting the economy.

The Government wants to ensure that the Framework encourages economic activity and gives business the certainty and confidence to invest, while also promoting sustainable development and the protection of the environment. In response to some of the comments received, the Government has clarified some specific aspects of the Framework. For example, the wording in the final Framework strengthens support for rural development.

We have not included specific reference to agriculture, forestries and fisheries as the Framework supports all forms of sustainable development, so individual sectors do not need to be referenced. However, the Framework does make clear that councils should take into account the economic and other benefits of the best and most versatile agricultural land, and that they should assess the needs of the food production industry and any barriers to investment that planning can resolve. The final Framework also includes appropriate references to tourism in both the rural economy and town centre policies.

We have made clear in the wording of the final Framework that councils should ensure that before releasing employment sites for other uses that there is no reasonable prospect of them being used for employment.

Market signals

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

Key messages included:

- Some respondents supported the use of market signals as part of the planning system, others considered that councils should have the flexibility to use market signals or not. Some strongly supported the need for planning to be more responsive to market signals.
- Some commented that plan-making needed to take a broader long-term view and not solely react to market signals; some argued that plans needed to take into account other wider factors in planning for an area's economic development.
- Some noted that market signals needed to be clearly defined.
- Some suggested a link to Local Enterprise Partnerships was needed in assessing market signals. In particular, respondents argued the need to engage local business when testing their evidence base on market signals.

The Framework is clear that plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of residential and business communities. It is not for central government to set out who councils should involve in this work: they will know best which organisations at local level will provide the most valuable input, for example the Local Enterprise Partnership. Market signals are only one of many factors that need to be taken into consideration as part of the planning process. It is for councils to decide how they use market signals to support the delivery of sustainable development in their area.

Town centres

Question 6a - Will the town centre policies enable communities to encourage retail, business and leisure development in the right locations and protect the vitality and viability of town centres?

Key messages included:

- There was strong support for the continuation of the town centre first policies.
- Many respondents commented that the removal of offices from the town centre first policies would not be beneficial. Many also sought more clarity on what should happen to applications that failed the sequential or impact tests.
- Some argued that the impact test should be set at up to 5 years rather than up to 10 years, as the longer time frame could mask the effects of development and it was harder to produce reliable data for such a long timeframe. However, it was accepted that for large schemes a longer timeframe might be appropriate.
- Some asked for clarification of what constituted retail and what constituted leisure activities.
- Some said the policy should highlight and give the flexibility to councils to promote locally distinctive town centres.
- Some asked that more recognition should be given to the role that tourism has in promoting sustainable town centres. There were also suggestions to promote markets as part of the town centre policies.

The Government welcomes the strong support for the continuation of the town centre first policy. We agree that the Framework must ensure strong policy protections for town centres, and have reflected this in the final text. For example, we have clarified how applications that fail the sequential or impact tests should be considered to ensure that development proposals that would cause unacceptable harm to town centres are not granted permission.

We have also clarified that councils should consider the impacts of unplanned out of centre proposals up to five years from when the application is made for most schemes, but also up to ten years for major schemes where the full impact would not be realised in five years.

We have retained offices as part of the town centre first policy, but clarified that small scale rural offices and other small scale rural development should not be covered by the town centre first policies.

In recognition of the importance of tourism in promoting town centres, we have also included a specific reference to tourism in the town centre policies. We have added a definition of main town centre uses to the glossary, which includes leisure and retail.

In response to calls to promote locally distinctive town centres, the Framework is now clear that local planning authorities should have policies that reflect the individuality of town centres.

The Government is committed to supporting high streets and the Framework reflects the recommendations from the Mary Portas review. The Framework achieves this by maintaining the strong town centre first policy and making clear that local councils should recognise their centres as the heart of their communities and pursue policies to support their viability. The Framework also specifically supports the retention and enhancement of existing markets and supports the introduction of new markets. It makes clear that parking charges should not be set at a level that undermines the vitality of town centres.

Transport

Question 7a – Does the policy on planning for transport take the right approach?

Key messages included:

- A number of respondents supported the policy for parking standards to be decided at a local level. Some commented that a national car parking standard should be reinstated.
- The policies in the Framework that recognised the different needs of urban and rural areas addressed the points some respondents raised about the heavy reliance individuals had on using personal cars for either rural or community use, jobs and services.
- Some respondents thought there should be a stronger statement on reducing greenhouse gases.
- Some suggested additional protection for sites which could be critical in developing transport infrastructure.
- Some said that developers should have an increased responsibility to assess traffic and transport impacts.
- Some respondents commented that protection for smaller airfields from housing and other development was not sufficient.
- Some respondents suggested that policies should seek to maximise air quality and reduce noise levels.

The Government believes the balance between supporting new development and mitigating transport impacts set out in the draft Framework was broadly correct. However, we have made some clarifications in the final Framework to reflect the consultation responses. For example, we have said that councils need to take account of the cumulative impact of development on the transport system when assessing applications, and have made clear that encouragement should be given to solutions which support reductions in greenhouse gas emissions.

We have considered the opposing views received on parking standards and have concluded the approach of giving power to Councils is right. However, we have now additionally set out that they should consider the availability and opportunities for public transport when setting their local standards.

The Framework makes clear that planning should provide proper protection from noise arising from new development. We have also made clear the important role of plan-making in minimising pollution including air quality.

We have kept policies that set out the different transport needs for rural areas, and concluded that our policies on the protection of sites which could be critical in developing infrastructure to widen transport choice strike the right balance. We have maintained the requirement for transport assessments and travel plans, and have concluded that our protection for smaller airfields from other development is proportionate.

Communications infrastructure

Question 8a – Is the policy on communications infrastructure adequate to allow effective communications development and technological advances?

Key messages included:

- Some respondents supported our policy that siting and design of installations should take account of the need to protect local amenity and the natural and built environment, but some wanted the policy to go further and include specific reference to designated heritage assets.
- Some suggested the Framework should state that the health impacts of telecommunication installations for planning purposes were limited to meeting the International Commission on Non-Ionizing Radiation Protection criteria..

Telecommunications play an important role in supporting a sustainable economy and society. The planning system needs to facilitate this through well-managed development for both new and existing telecommunications systems.

The Framework promotes the need for equipment to be sympathetically designed and camouflaged where appropriate, and policies elsewhere in the Framework set out clear protection for heritage assets from new development.

The final Framework makes clear the importance of mobile communications to meeting the overall aim of achieving sustainable development. It also now includes a specific reference to the need to ensure International Commission on Non-Ionizing Radiation Protection criteria guidelines for public exposure are met.

Minerals

Question 9a – Do the policies on minerals planning adopt the right approach?

Key messages included:

- There was strong support for securing an adequate supply of minerals.
- There was general support for streamlining minerals policy, but clarity was also sought on which policies applied to which minerals.

- There were a number of suggestions requesting recognition that minerals were different to most other forms of development as they could only be extracted where they naturally occur.
- Some respondents requested retaining the minerals hierarchy to minimise pressure on resources.
- Some wanted more clarity on the different responsibility of minerals planning authorities and all planning authorities.
- There was a strong response from the minerals industry to restore landbanks policy for industrial minerals.
- There were mixed comments on the proposal to phase out peat, with strong support from some groups countered by opposition from peat producers, and some comments that sites with existing permissions may not be the most suitable in terms of environmental impacts.
- There were some calls to further restrict aggregate extraction from National Parks.
- There was strong support for policies which sought high quality restoration and aftercare. Many respondents commented that sites should be restored to uses most appropriate for the community and that restoration should be carried out to high standards.
- There were some requests to further clarify wording on the Managed Aggregate Supply System.
- There was support for policy which recognised the important contribution that small, historic quarries may make to the provision of building stone for the repair of historic buildings. Some comments from businesses that policy on small-scale extraction of building stone was too restrictive and should be expanded.
- There were some calls for further clarity over how planning authorities should manage rates of extraction and work together on industrial minerals.
- There was support from some respondents for environmental criteria but there were a number of calls for clarification, particularly on noise and dust.
- There were strong calls to maintain some technical guidance, particularly on environmental criteria.
- Mixed comments were received relating to the presumption against coal development. Some councils, organisations and private individuals commented that it should remain; others, including the coal industry, called for rewording of the text whilst continuing to place strong emphasis on retaining high environmental standards.
- Some respondents argued for more clarity on policy for on-shore oil and gas, particularly on what gases are covered by this policy.

The final Framework clarifies which policies apply to which minerals e.g. aggregate, industrial and energy minerals. It also recognises that minerals are different to most other forms of development as they can only be extracted where they naturally occur.

The Government has decided to retain landbanks policy for industrial minerals; the Framework now provides certainty and secures a minimum provision of raw material to justify the capital investment in relevant manufacturing and industrial facilities. The Framework also includes additional text to highlight and strengthen the important role of building stone.

The Government carefully considered all responses to the proposal to phase out planning permission for peat extraction, including the suggested amendments to the text that might allow some continued level of extraction, in the context of its overarching policy ambition in the Natural Environment White Paper to reduce horticultural peat use to zero in England by 2030. As part of this, the interaction of planning policy with the work of the Sustainable Growing Media Task Force was taken into account. Whilst the Task Force is beginning to develop some level of consensus around a broad set of principles in relation to the concept of sustainable growing media, agreement on how these principles might be implemented in practice has not been reached. Without an agreed alternative suggestion in place which provided the required level of assurance with respect to the potential impact of the policy on the environment, it was decided to retain the proposed policy to reflect the Government's commitment to reduce the overall environmental impact of peat extraction in this country.

The Framework now includes text to reflect the minerals hierarchy, in line with the need to secure a prudent use of minerals resources. The Framework is clear that Local Plans need to take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously.

The Framework now includes a glossary definition of 'local planning authority' to provide clarity on responsibilities of minerals planning authorities and other councils.

The Framework is clear that local planning authorities, as far as is practical, should provide for the maintenance of landbanks of non-energy minerals from outside National Parks. However, the policy has not restricted aggregate extraction from National Parks in recognition that some minerals may only be found in National Parks.

We have also made clear that, in working together and planning rates of extraction, local planning authorities should identify and include policies for extraction of mineral resource of local and national importance in their area. The Government has also clarified arrangements for aggregate minerals planning. The main emphasis is on the preparation by minerals planning authorities, either individually or jointly by agreement with another or other mineral planning authorities, of a Local Aggregate Assessment.

Policy also now includes a more detailed list of environmental issues that must be considered for minerals extraction (e.g. unavoidable noise, dust and particle emissions and that any blasting vibrations are controlled, mitigated or removed at source). Further details are contained in the accompanying technical guidance.

The Framework has been strengthened to encourage restoration and aftercare to recognise explicitly the need to safeguard the potential for long term use of best and most versatile agricultural land. The drafting of policies on coal, on-shore oil and gas has been clarified.

Housing

Question 10a – Will the policies on housing enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand?

Key messages included:

- Some respondents commented that the housing shortage was not necessarily solely as a result of the planning system, but also due to a lack of finance, a significant number of unimplemented permissions not being developed and empty homes that could be used to help address the housing shortage.
- Some suggested that Strategic Housing Market Assessments should be examined at public inquiries and that there was a need for the Strategic Housing Market Assessment guidance to be updated.
- Some suggested that the requirement for councils to meet demand for housing should be removed.
- Some argued that whilst they supported the requirement for a five-year supply of specific deliverable sites, all extant planning permissions should be counted in the supply. There were mixed comments on whether windfall sites should be included in the five year supply or not.
- Some supported the proposed requirement for an additional allowance of at least 20 per cent. Others said that this requirement should be removed.
- Some commented that the Framework should set national minimum density standards. Most agreed that standards should reflect the location and accessibility of the site.
- Some commented that more emphasis was needed on the importance of planning for a good mix of housing.
- Some welcomed the policies on affordable housing, including in rural areas. Some commented that the Framework should say that housing development with no affordable housing would not normally be acceptable. Others argued that the current approach to Rural Exception Sites should be retained.
- Some said the policy on isolated homes in the countryside should be clarified or removed. However, others argued that it was sometimes appropriate to support new homes in isolated locations.
- Many commented that the Framework should clarify that development should be focused on brownfield land where possible. There were mixed views about the proposed removal of the national indicative brownfield target.
- Some respondents suggested that the policy should include protections against back garden development, while others commented that appropriate development on back gardens should be allowed.
- It was suggested that the Framework should make specific reference to the benefits which comprehensively planned new settlements can provide.

The Government recognises that the housing shortage is not necessarily solely the result of the planning system, and has put in place a Housing Strategy (November 2011) that includes a range of measures to get the housing market moving again - including tackling empty homes.

The Government is committed to reviewing all national planning guidance, including the Strategic Housing Market Assessments guidance. The evidence base

supporting Local Plan policies, which could include a Strategic Housing Market Assessment, would inevitably be scrutinised at public inquiry.

The Framework has been revised to reflect some points raised on the requirement to meet the demand for housing. Councils should consider the need for market and affordable housing in the housing market area, which includes demand, but only as far as is consistent with the other policies set out in the Framework. Strong policies apply for protected land such as Areas of Outstanding Natural Beauty and Green Belt. In addition, we have clarified the policy on previously developed brownfield land to encourage its effective use.

We have carefully considered the points raised on the addition of a 20% buffer to the five-year supply. The policy has been made more responsive to local circumstances. The buffer for the five-year land supply that applies to all councils has been reduced to 5%, but the 20% buffer has been retained for councils that have persistently under-delivered housing. Councils will be able to include a windfall site allowance and extant planning permissions in the five year supply where certain criteria are met.

The final Framework does not include density thresholds as we believe local planning authorities are best placed to decide density standards for local areas taking account of local needs and constraints.

Having considered the responses carefully, we have concluded that the policy that asks councils to provide a mix of housing for the different groups in the community was clearly expressed. We have made clear that the list of groups in the community with different housing requirements to consider is not intended to be exhaustive.

New policies have been added to clarify that councils can consider the role larger scale development, such as new settlements or extensions to existing villages and towns, can have in achieving sustainable development. This should be done working with their communities.

We have made clear that councils should consider the case for resisting inappropriate development on residential gardens where this would be harmful. We have also included a specific mention of Rural Exception Sites in the policy on rural housing and defined them in the glossary. Councils will now have discretion to allow small numbers of market homes on rural exception sites to ensure their viability. Policy requirements on affordable housing and the mix of housing have been retained. The policy on isolated homes has not been removed from the Framework as we believe it strikes the right balance.

Planning for schools

Question 11a – Does the policy on planning for schools take the right approach?
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Key messages included:

- Some national representative bodies suggested that the approach to schools should emphasise the importance of ensuring that site, buildings and transport infrastructure are appropriate to accommodate the proposed number of pupils and provide high quality facilities.
- Some councils suggested the Framework needed to be more explicit about the provision of education being a priority.
- Some individual responses suggested school developments had the same impact on the environment as other developments, and so should be subjected to similar scrutiny.
- Some professional bodies suggested that adding “very significant weight” to the establishment of schools distorted other aims in the Framework.

The final Framework reflects the great importance the Government attaches to ensuring that there are sufficient choices of school places available to meet the needs of existing and new communities. It regards meeting those needs as the key objective to be met in planning for schools.

In terms of applying a flexible approach to the reuse of existing schools and enabling the development of schools, the Framework is clear that local planning authorities should give great weight to the need to create, expand or alter schools. The Government does not believe that highlighting the importance of planning for schools, a key piece of infrastructure, will distort other aims of the Framework. The policies in the Framework, including environmental policies, will apply to all types of development including schools.

In planning for schools, the Framework makes clear that local planning authorities should work to identify and overcome any planning issues surrounding potential schools sites – which would include any issues relating to site capacity and infrastructure.

We will work closely with experts in different fields to determine whether any additional guidance is needed to support the policy on schools provision.

Design

Question 12a – Is the policy on planning and design appropriate and useful?
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Key messages included:

- There was strong support for the broad principles on design set out in the draft Framework.
- Some respondents said developments of less than “obviously” poor design should also be refused.
- Many respondents agreed that high quality design should be an integral part of the planning system and planning decisions, and should also be given a high profile in the Framework.
- There was a divide between responses over whether councils should promote certain architectural styles / local styles over others. Some respondents argued that the focus should simply be on good quality design.
- Some respondents said that policies should take account of local building materials.
- Some respondents argued that although design codes were a good idea, it would be important in practice that they were not too limited or prescriptive.
- There was strong support for the policy that encouraged developers to work closely with local communities in the design of new development proposals.
- Some commented that the Framework should highlight the cumulative impact of advertisements and on the need for the retention of guidance in Circular 03/07: *Town and Country Planning (Control of advertisements) (England) Regulations 2007*.

The Government agrees with respondents that good design should be an integral part of the planning system, and we welcome the support for the design policies set out in the draft Framework. The key design policies from the draft Framework have therefore been retained in the final Framework.

In order to address the consultation comments, some clarifications have been made to the final Framework. For example, the Government believes that requiring councils to refuse applications of less than “obviously” poor design set too high a test for refusing applications. The word “obviously” has therefore been removed from the final text.

We have also amended the wording to clarify that developments should create a sense of place and respond to local character and history while also promoting good design and have strengthened the text to promote the use of local building materials where appropriate.

In order to address comments about the cumulative impact of advertisements, the final Framework now includes a reference to cumulative impacts. Guidance on the control of advertisements will be considered as part of the review of planning guidance.

The draft Framework set out that local planning authorities should not impose architectural styles or particular tastes, but we have made clear in the final Framework that it is proper to seek to promote or reinforce local distinctiveness. Neighbourhood plans can play a key role in setting local design criteria.

We have concluded that the policy in the draft Framework was clear that councils should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development. We have, therefore, retained this in the final Framework.

The final Framework continues to promote collaborative working between developers and communities on design issues, and we have clarified that proposals where the design has evolved to take account of the views of the community should be looked on more favourably. We have also added high quality design as a core planning principle.

Green Belt

Question 13a – Does the policy on planning and the Green Belt give a strong clear message on Green Belt protection?

Key messages included:

- There was strong support for our policy to retain key Green Belt protections.
- Some respondents sought clarification of whether the presumption in favour of sustainable development would “trump” the Green Belt policy, and therefore whether the policy needed to be reinforced.
- It was suggested that the Framework should state that Metropolitan Open Land in London was equivalent to Green Belt land.
- Some respondents suggested that councils should be required to cooperate with neighbouring authorities when reviewing Green Belt boundaries that run across local authority boundaries.
- There was some support for the policy that stated that it should not be necessary to designate new Green Belts except in exceptional circumstances, while other respondents suggested that the restriction on councils creating new Green Belts should be removed. Some commented that there should be a requirement for councils to regularly review their Green Belt boundaries.
- There was recognition by some respondents that small-scale development in the Green Belt was necessary in order to support sustainable communities. Others commented that no development should be allowed in the Green Belt under any circumstances.
- Some respondents suggested that in order to make the Framework more pro-growth, the types of development that were considered “not inappropriate” in the Green Belt should be expanded.
- Some respondents commented that several of the forms of development identified as being ‘not inappropriate’ should be either removed or made subject to the ‘very special circumstances’ policy.
- Some respondents commented that renewable energy development should be considered ‘not inappropriate’ in the Green Belt to support climate change targets.

The Government believes that the policies in the draft Framework maintain strong Green Belt protection. However, in response to some of the comments made, we have clarified the policy position in the final Framework. For example, we have made clear that the presumption in favour of sustainable development does not “trump” the Green Belt policy. We have also removed the statement that it should not be necessary to designate new Green Belts.

The Government believes that it is not for national policy to direct councils on when they should review Green Belt boundaries. Councils are best placed to decide when Green Belt reviews should take place.

In relation to suggestions that the policy should be amended to enable more or less types of development to take place in the Green Belt, the Government believes the policy in the draft Framework set the right balance between allowing development that will not harm the Green Belt and providing benefits to local communities.

Metropolitan Open Land is a designation in the London Plan. It is properly protected there and it would not be necessary or appropriate to set out Mayoral policy in the national policy. The Government is also clear that cooperation between councils on strategic planning matters will be an integral part of preparing robust policies on cross boundary issues.

Climate change, flooding and coastal change

Question 14a – Does the policy relating to climate change take the right approach?

Key messages included:

- Some respondents argued that more emphasis was needed on tackling climate change as a central concern of planning system.
- The specific mention of green infrastructure as a key adaptation tool was welcomed, but some wanted the focus of this section to be wider and noted that climate change mitigation and adaptation could be given more weight.
- Some respondents said the Framework should highlight key impacts arising from climate change, focusing on what new developments should address.
- There were some calls for encouragement of the prudent use of natural resources, particularly water resources, and to protect and enhance water quality.
- Some respondents asked for a clearer link between national targets and local planning responsibilities, which should include an explicit mention of the Climate Change Act.
- A number of respondents called for more guidance on climate change, including on identifying areas for energy generation and local energy planning.
- Some respondents suggested that there should be more emphasis on energy efficiency and the reuse of buildings.
- Some respondents suggested that the heat (or urban) island effect needed to be addressed for both buildings and the public realm.

- Some argued that the sustainable buildings policy could be clearer and that councils should be able to exceed national standards. There were some calls for explicit reference to the Code for Sustainable Homes.
- Some were keen to ensure that the final Framework did not have a pro-development focus that would potentially outweigh policy on climate change.

The Government recognises the role of planning in helping places adapt to the impacts of climate change and this is firmly underlined in the Framework. We make it clear that meeting the climate change challenge is part of delivering sustainable development. The broad contribution of planning is recognised through exemplification in the policy and explanatory text in the glossary.

A number of key impacts arising from climate change are detailed in the Framework and we consider that the level of detail is appropriate in the context of the National Planning Policy Framework. As part of the environmental dimension of sustainable development, the Framework promotes the prudent use of all natural resources, including water.

Respondents suggested that there should be more reference to energy efficiency and the reuse of buildings. The Framework supports energy efficiency improvements to existing buildings. The overarching core planning principles also support the transition to a low carbon future and encourage the reuse of existing resources, including conversion of existing buildings.

The policies in the Framework support a broad range of Government strategies and targets. Whilst it is not practical to list all of these, the Framework now includes reference to the Climate Change Act 2008. The Framework allows for councils to set out local environmental standards in their Local Plans, and these can exceed national standards where appropriate and viable. We do not think, therefore, that it is necessary for the Framework to reference the Code for Sustainable Homes.

With regard to the requests for guidance, we will work closely with experts in different fields to consider carefully what guidance may be needed and if it should be updated.

Renewable energy and low carbon energy

Question 14c – Will the policy on renewable energy support the delivery of renewable and low carbon energy?

Key messages included:

- Some respondents were of the view that energy security was a cross cutting concern and merited a separate energy chapter or at least greater cross-referencing to other sections in the Framework.
- Some commented that the Framework did not emphasise enough the role of energy as a driver of economic growth. Conversely, there were some comments that the presumption in favour of sustainable development could lead to a default 'yes' to renewable energy.

- Some respondents suggested that policies for energy developments needed to be considered alongside other policies and interpreted in the light of local circumstances.
- Some respondents suggested better connection between waste management (sustainable biomass) and renewable planning.
- Many respondents, particularly from the renewables industry and energy sector, suggested a stronger emphasis on renewable energy including suggestions for a 'presumption in favour' or a compulsory duty to supply renewable energy.
- There were mixed views on whether councils should set local renewable targets.
- Some respondents suggested that new builds should be carbon neutral or meet the Code for Sustainable Homes high standard.
- Some respondents asked for supplementary guidance or for retention of existing practice guidance in Planning Policy Statement 1 and Planning Policy Statement 22.

The Government carefully considered responses calling for the inclusion of a separate section on energy security in the Framework. However, we considered the advantages of keeping together the policies for renewable energy and reducing emissions in a succinct expression of national policy, and these outweighed the suggested alternatives. Energy as a distinct area of concern is highlighted as a strategic priority for Local Plans, and as part of the evidence base which should underpin plan preparation.

The Framework clearly supports all forms of sustainable development, and we do not think it is necessary to set out particular industries or a presumption in favour of certain types of development. Energy, and renewable and low carbon energy, get strong backing from the policies in the Framework.

Respondents also called for better connections between waste management and renewable planning. The Framework provides for this as energy from waste is within the scope of the policies to promote energy from renewable and low carbon sources.

The Framework does not rule out councils setting their own targets, where appropriate and viable. We believe that councils are best placed to make the decision on what development, and to what standards, should take place in their areas.

With regards to calls to provide practice guidance to support the Framework, we will work closely with experts in the sector to consider the case for this as part of the wider review of guidance.

Question 14e – Does the draft Framework set 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?

Key messages included:

- Some respondents welcomed the test for renewable and low carbon energy developments outside opportunity areas but the renewables industry and energy sector raised some concerns about the approach councils would take.
- Some councils thought costs for identifying opportunity areas were prohibitive in the current economic climate. Several respondents, across all groups, were in favour of a criteria-based approach being applied.
- Some respondents asked for greater alignment between national targets and local planning responsibilities and priorities.
- Some suggested that planning should support zero carbon developments and include policy on allowable solutions. Some said that planning's role in cutting carbon emissions from existing places could be more clearly emphasised.
- Some asked for explicit mention of National Policy Statements and for them to be included as a material consideration for all energy projects.
- Some wanted better protection for landscapes and the environment from renewable developments, particularly wind farms, and that the cumulative impacts of development should be recognised.
- Some wanted more emphasis on community views in decisions on planning applications for renewable energy development.
- Some wanted to retain the current policy requiring a percentage of energy to be used in new development to come from local renewable sources.
- Some commented that the supportive policy on innovative buildings that promoted high levels of sustainability could undermine traditional townscapes.

The Government considered the range of responses received, and has ensured that the substance of existing policy has been retained. The Framework makes it clear that the planning system should aim to conserve and enhance the natural environment, and previous protections will continue to apply.

Councils are asked to consider identifying suitable areas for renewable energy developments. This is not a requirement on them. Where they consider it inappropriate or unhelpful to identify such areas they do not have to. Councils are free to set their own criteria, reflecting the policies in the Framework for protecting the natural and historic environment.

The Government is clear that whether to adopt local targets is a matter for Local Plans. The Framework does not however rule out councils setting their own targets, where appropriate.

The key role of planning in cutting carbon emissions is set out clearly in the Framework, as is the need for planning policy and decisions to be consistent with the Government's zero carbon buildings policy. The Framework also explains that National Policy Statements form part of the overall framework of national planning policy and are capable of being a material consideration in decisions.

The Framework notes that local planning authorities should design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.

The Government supports meaningful engagement and collaboration with neighbourhoods, local organisations and businesses. This relates to both plan-making and decision-taking, and applies to proposals for renewable energy as well as other forms of development.

Flooding and coastal change

Question 14g – Does the policy on flooding and coastal change provide the right level of protection?

Key messages included:

- Many respondents thought that the proposed policy was appropriate and reflected current national policy, although some wanted clarification on how the presumption would work with the policy.
- The retention of existing policies on flood risk and coastal change was generally welcomed. However, the success of this was dependent on the availability of expertise and it was suggested that the Framework should urge applicants to use experienced specialists.
- Some respondents asked for technical guidance on coastal management and flood risk. Many respondents were in support of the continuation of existing national guidance in Planning Policy Statement 25 and the Coastal Supplement and their associated Practice Guides.
- Many respondents welcomed the sequential risk-based approach to flood risk. Some suggested more clarity could be added on how this approach should be applied in practice.
- Some respondents felt that the Framework could be clearer about the need to take into account how any proposed development would affect land further down rivers and flood areas.
- Some wanted more emphasis to requiring sustainable drainage systems; and/or reference to statutory arrangements under the Flood and Water Management Act 2010.
- Some wanted to reference the role of Internal Drainage Boards, Lead Local Flood Authorities and the Environment Agency in the plan making process.
- Some respondents suggested that coastal planning policy should take account of the Marine Planning Policy Statement, climate change and longer term impacts.
- Some suggested including explicit references to waste water and also the EU Water Framework Directive requirements.

To ensure that the policy on development and flood risk is properly understood and can be applied appropriately, the Government will be retaining technical guidance on: the Sequential and Exception Tests; flood zones; flood risk assessment and how

the impact of climate change should be taken into account and managing residual flood risk.

For additional clarification, we have also: moved information on the Sequential and Exception Tests previously in footnotes to the main text of the Framework; added references to the need to take account of advice from other relevant bodies in the development of Local Plan policies to manage flood risk; and made reference to the statutory requirements under the Flood and Water Management Act 2010. We have also added references to the UK Marine Policy Statement and marine plans, and we make clear that Local Plans should take account of climate change over the longer term, including in relation to coastal change.

We recognise the need to maintain technical guidance on flood risk and have included this in the technical guidance published alongside the Framework. The Framework also includes references to the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards.

The Framework makes clear that development should not increase flood risk elsewhere. This is a consideration for strategic and / or site-specific flood risk assessments, and technical guidance on flooding published alongside the Framework sets out how this policy should be implemented.

We do not think it is necessary to specifically reference the EU Water Framework Directive in the Framework. The introduction to the Framework makes clear that planning policies and decisions must reflect and, where appropriate, promote relevant EU obligations and statutory requirements.

A number of respondents noted that the success of this policy was dependent on the availability of expertise and that the Framework should urge applicants to use experienced specialists. The Government does not consider it appropriate for the Framework to advise applicants on how they should prepare their application.

Natural and local environment

Question 15a – Does policy relating to the natural and local environment provide the appropriate Framework to protect and enhance the environment?

Key messages included:

- There was broad support for the objectives and policies to protect and enhance the natural environment. However, some asked for clarity on what impact the presumption in favour of sustainable development would have in practice on the protection of the natural environment.
- Some respondents thought the protections for National Parks and Areas of Outstanding Natural Beauty could be more clearly expressed.
- Additional protections for countryside outside designated areas were suggested.

- Some respondents suggested the Framework could reflect the requirements of the European Landscape Convention.
- Some suggested that the role of green infrastructure could be articulated more fully in the Framework.
- Some called for specific references to Sites of Special Scientific Interest and Local Wildlife Sites in the Framework.
- Some requested additional protections for ancient woodlands than exist in current policy.
- There were suggestions that the Framework could better reflect the aims of Natural Environment White Paper.
- A number of respondents sought recognition that brownfield sites may have biodiversity value, and that the brownfield definition should exclude such sites.
- Some commented that geodiversity should be treated in the same way as biodiversity.
- Some felt the role of the planning system in reducing pollution could be clearer.
- Some wanted more clarity on who was responsible for cleaning up contaminated land and for separation of text on pollution and contaminated land.
- A number of respondents sought strengthening of text on air quality to emphasise the important role of planning in ensuring compliance with European legislation on air quality.
- Some suggested that the Framework should have greater emphasis on dealing with unstable land.
- Some felt that the protection for sports facilities, including playing fields could be strengthened.
- There was strong support for the proposal to introduce a new policy enabling communities to designate for special protection Local Green Space land. However, there were mixed views about the designation process for Local Green space, with some suggesting it was too restrictive and conversely others arguing that it would be too easy to use the process to frustrate development.

The drafting of the Framework has been carefully reviewed to ensure that the protection offered for the natural environment is as clear as possible.

The Framework asks councils to recognise the wider benefits of ecosystem services and contribute to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks.

The drafting has been carefully reviewed to ensure the retention of existing policy protections for Sites of Special Scientific Interest. A specific reference to Local Wildlife Sites has now also been included in the glossary of locally designated sites, and the importance of locally designated sites, including Local Wildlife Sites, is reflected in the policies. The Government has also responded to calls to recognise Nature Improvement Areas and Local Nature Partnerships, and explicit references to these have now been included in the Framework.

The consultation document carried forward the policy intention of the previous policy for National Parks, the Broads and Areas of Outstanding Natural Beauty, but in the light of consultation comments we have made minor amendments to the Framework to make this clearer. The statutory purposes of National Parks are also made clear in a footnote referencing the *English National Parks and the Broads: UK*

Government Vision and Circular 2010. The Framework carries forward the existing strong level of protection for ancient woodlands.

In light of the consultation responses, the Framework makes clear the importance of the planning system in minimising pollution, and clarifies the text on contaminated land. The Government considers that the Framework provides sufficient clarity on the need to comply with EU Directives on air quality.

The final Framework makes clear that the planning system should contribute to, and enhance, the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

It is not considered necessary to specifically reference the European Landscape Convention, as the general approach is reflected in the Framework. We have included a definition of Green Infrastructure in the glossary to make clear that it is capable of delivering a wide range of environmental and quality of life benefits for local communities. The Framework has also been amended to provide greater reference to geodiversity.

The final Framework states that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

The Framework has been amended to ensure it is clear that a playing field should not be built on unless there is clear evidence that it is surplus to requirements, or the loss would be replaced by equivalent or better provision in terms of quantity or quality, or the development is for an alternative sports or recreational provision the needs for which clearly outweigh the loss. The Local Green Space policy has been retained, but with clarifications and added flexibility so as to avoid ruling out designation of green space of local significance.

Historic environment

Question 16a – Does this policy provide the right level of protection for heritage assets.

Key messages included:

- There was strong support for retaining key protections for the historic environment. However, some respondents expressed concern about the level of protection for heritage assets, and some proposed that the presumption in favour of the conservation of designated heritage assets in Planning Policy Statement 5 should be carried forward into the Framework
- Some respondents felt that there was not an even balance between the policies on historic environment and natural environment.
- Some commented that there was too little emphasis on the positive contribution the historic environment made to sustainable development, and more references were needed to the fact that heritage assets were a finite resource and should be put to viable uses.

- Some respondents said the role of heritage conservation in, for example, providing a stimulus to regeneration of an area, promoting local identity and a sense of place, and as a major element of the tourist industry could be more clearly expressed.
- Some commented that the absence of a policy relating to ‘less than substantial harm’ to a designated heritage asset represented a weakening of protection compared to the current policies, and that smaller scale alterations could often, on a cumulative basis, cause unacceptable harm.
- There were some calls for more clarity about how conservation of heritage assets would be affected by the neighbourhood planning process and by Neighbourhood Development Orders, particularly about the protection that would be given to nationally important but undesignated archaeological sites.
- The policy that the loss of an unlisted building which made a positive contribution to a conservation area or World Heritage Site should be treated as substantial harm to a designated heritage asset was welcomed by some, but others considered it was disproportionate and placed unnecessary restrictions on development.
- Respondents also sought more policies and emphasis on buildings which were either locally listed or are otherwise felt to be of local importance.
- Some respondents requested a specific policy on the impact of development on the setting of heritage assets.
- There were some comments that the policy on undesignated heritage assets was not sufficiently clear.

The Government is committed to maintaining existing levels of protection for the historic environment. We have amended the Framework in a number of ways to address the responses to the consultation.

The Framework provides a comprehensive basis for protecting heritage assets through the planning system. We have modified the policies to make it clear that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. Greater clarity has been provided by emphasising that this significance can be harmed or lost by development within the asset’s setting as well as through physical changes to the asset itself.

Further clarity has been provided to ensure that where a development proposal will lead to ‘less than substantial harm’ to a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. The policy on heritage assets that are not designated has been reworded, and makes it clearer that it is the effect on the significance of the asset that has to be taken into account in determining applications. In this context, re-introduction of the presumption in favour of designated heritage assets is unnecessary and could lead to confusion about the inter-relationship with the presumption in favour of sustainable development.

Additional references have been made to the desirability of putting heritage assets to viable uses; to the need to take account of opportunities to draw on the contribution made by the historic environment to the character of a place; and to the positive contribution that heritage conservation can make to sustainable communities, including their economic vitality.

The drafting of the policy on loss of buildings that make a positive contribution to a Conservation Area or World Heritage Site has been carefully reworded to ensure a more balanced approach in line with existing policy, which depends on whether the harm is substantial or less than substantial taking account of the relative significance of the building affected and its contribution to the significance of the area or site as a whole.

Some respondents sought specific references to locally listed buildings in the Framework. The historic environment section is clear that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. The content of that strategy, including that relating to locally important buildings, is for individual authorities rather than a matter of national policy.

Responses indicating that more clarity was needed about the protection of heritage assets in relation to Neighbourhood Development Orders, are being addressed by legislative means.

Planning policy for traveller sites

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?

The key messages below have been identified from the written responses as well as from the oral hearings:

- Some respondents noted that the greater length and detail, and different format, of the planning policy for traveller sites could give the impression that site provision for traveller sites had more weight than other policy areas.
- There was support for the proposition that traveller site policy should eventually be incorporated into the Framework.
- Some respondents suggested that the policy approach for traveller site provision should be the same as for housing, as set out in the Framework. In particular the policies on: setting out the strategic role of housing; the need for joint working between councils to provide housing; the assessment of need and role of the Strategic Housing Market Assessment; the presumption in favour of sustainable development; and policies for siting housing in rural areas.
- Some respondents suggested that there was inconsistency between Green Belt policies in the planning policy for traveller sites and the Framework.
- A number of respondents sought greater consistency between consideration of traveller needs and general accommodation needs.

The planning policy for traveller sites has been subject to extensive consultation as a standalone document and also in the context of the consultation on the Framework.

The Government has decided to publish a separate traveller site policy that should be read in conjunction with the National Planning Policy Framework. The traveller

site policy has been published in a separate document to allow focus on this specific policy area, which causes a high degree of community stress. It will benefit those engaged in planning for traveller sites by clearly setting out specific traveller site policies in a separate document. The Government intends to review this policy when fair and representative practical results of its implementation are clear. It is intended to incorporate a version of this policy within the National Planning Policy Framework at that stage, having taken account of the results of its implementation.

The Government has ensured that the policy on Green Belt in the final traveller site document aligns with general policy on Green Belts set out in the Framework. It clarifies that traveller sites, like most forms of development, would constitute inappropriate development in the Green Belt.

The Government has aligned traveller site and housing planning policy where we think it is effective to do so. Full details of the traveller sites consultation can be found in the traveller sites planning policy summary of consultation responses report.

Annex A – Analysis by respondent type

Question 1a - The Framework has the right approach to establishing and defining the presumption in favour of sustainable development.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	43 (8%)	152 (30%)	31 (6%)	11 (2%)	274 (54%)	511
Private individuals*	76 (2%)	734 (20%)	186 (5%)	94 (3%)	2522 (70%)	3612
Local government / parish councils / other public bodies	66 (8%)	324 (40%)	87 (11%)	20 (3%)	306 (38%)	803
National representative bodies / professional bodies	38 (24%)	47 (30%)	21 (13%)	15 (10%)	37 (23%)	158
Businesses / house builders	82 (31%)	46 (17%)	23 (9%)	74 (28%)	41 (15%)	266
Overall Response	305 (6%)	1303 (24%)	348 (7%)	214 (4%)	3180 (59%)	5350

Question 2a -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.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	44 (12%)	145 (39%)	61 (17%)	10 (2%)	109 (30%)	369
Private individuals*	129 (6%)	582 (27%)	552 (25%)	48 (2%)	861 (40%)	2172
Local government / parish councils / other public bodies	90 (14%)	284 (43%)	149 (23%)	15 (2%)	120 (18%)	658
National representative bodies / professional bodies	24 (19%)	35 (28%)	48 (38%)	6 (5%)	13 (10%)	126
Businesses / house builders	71 (33%)	44 (21%)	43 (20%)	36 (17%)	18 (9%)	212
Overall Response	358 (10%)	1090 (31%)	853 (24%)	115 (3%)	1121 (32%)	3537

* These responses largely reflected the issues raised by the principal campaigns.

Question 2c - The policies for planning strategically across local boundaries provide a clear Framework and enough flexibility for councils and other bodies to work together effectively.

Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	45 (16%)	83 (29%)	91 (33%)	12 (4%)	50 (18%)	281
Private individuals*	201 (11%)	372 (21%)	688 (39%)	37 (2%)	475 (27%)	1773
Local government / parish councils / other public bodies	119 (23%)	197 (37%)	124 (24%)	35 (7%)	48 (9%)	523
National representative bodies / professional bodies	26 (26%)	32 (31%)	36 (35%)	3 (3%)	5 (5%)	102
Businesses / house builders	53 (32%)	35 (21%)	49 (30%)	18 (11%)	10 (6%)	165
Overall Response	444 (16%)	719 (25%)	988 (35%)	105 (4%)	588 (20%)	2844

Question 3a - In the policies on development management, the level of detail is appropriate.

Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	41 (14%)	97 (34%)	72 (26%)	5 (2%)	68 (24%)	283
Private individuals*	121 (7%)	409 (23%)	620 (35%)	38 (2%)	575 (33%)	1763
Local government / parish councils / other public bodies	108 (21%)	214 (41%)	115 (22%)	5 (1%)	81 (15%)	523
National representative bodies / professional bodies	24 (23%)	35 (34%)	31 (30%)	2 (2%)	12 (11%)	104
Businesses / house builders	63 (36%)	39 (23%)	44 (25%)	13 (8%)	14 (8%)	173
Overall Response	357 (13%)	794 (28%)	882 (31%)	63 (2%)	750 (26%)	2846

* These responses largely reflected the issues raised by the principal campaigns.

Question 4a - Any guidance needed to support the new Framework should be light-touch and could be provided by organisations outside Government.

Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	41 (16%)	82 (31%)	71 (28%)	9 (3%)	58 (22%)	261
Private individuals*	185 (11%)	336 (19%)	512 (30%)	68 (4%)	627 (36%)	1728
Local government / parish councils / other public bodies	62 (14%)	167 (36%)	138 (30%)	5 (1%)	87 (19%)	459
National representative bodies / professional bodies	21 (23%)	20 (22%)	27 (30%)	8 (9%)	15 (16%)	91
Businesses / house builders	45 (29%)	37 (24%)	40 (25%)	13 (8%)	22 (14%)	157
Overall Response	354 (13%)	642 (24%)	788 (29%)	103 (4%)	809 (30%)	2696

Question 5a - The 'planning for business' policies will encourage economic activity and give business the certainty and confidence to invest.

Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	42 (15%)	73 (26 %)	118 (43%)	2 (1%)	41 (15%)	276
Private individuals*	209 (11%)	360 (20%)	716 (40%)	72 (4%)	441 (25%)	1798
Local government / parish councils / other public bodies	128 (25%)	163 (32%)	156 (30%)	12 (2%)	55 (11%)	514
National representative bodies / professional bodies	23 (23%)	24 (24%)	45 (44%)	2 (2%)	7 (7%)	101
Businesses / house builders	59 (35%)	24 (14%)	50 (30%)	24 (14%)	12 (7%)	169
Overall Response	461 (17%)	644 (22%)	1085 (37%)	112 (5%)	556 (19%)	2858

* These responses largely reflected the issues raised by the principal campaigns.

Question 6a - 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.

Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	53 (20%)	66 (24%)	93 (34%)	15 (5%)	45 (17%)	272
Private individuals*	335 (19%)	293 (17%)	718 (41%)	49 (3%)	356 (20%)	1751
Local government / parish councils / other public bodies	122 (25%)	154 (31%)	123 (25%)	40 (8%)	57 (11%)	496
National representative bodies / professional bodies	18 (21%)	20 (23%)	37 (43%)	3 (3%)	9 (10%)	87
Businesses / house builders	44 (29%)	26 (17%)	58 (38%)	10 (7%)	13 (9%)	151
Overall Response	572 (21%)	559 (20%)	1029 (37%)	117 (4%)	480 (18%)	2757

Question 7a - The policy on planning for transport takes the right approach.

Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	49 (18%)	79 (30%)	80 (31%)	6 (2%)	49 (19%)	263
Private individuals*	219 (12%)	449 (24%)	700 (37%)	27 (1%)	481 (26%)	1876
Local government / parish councils / other public bodies	95 (19%)	202 (39%)	126 (24%)	29 (6%)	60 (12%)	512
National representative bodies / professional bodies	25 (25%)	20 (20%)	39 (40%)	3 (3%)	12 (12%)	99
Businesses / house builders	53 (33%)	24 (15%)	54 (34%)	18 (11%)	12 (7%)	161
Overall Response	441 (15%)	774 (27%)	999 (34%)	83 (3%)	614 (21%)	2911

* These responses largely reflected the issues raised by the principal campaigns.

Question 8a - Policy on communications infrastructure is adequate to allow effective communications development and technological advances.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	44 (21%)	32 (16%)	109 (53%)	4 (2%)	17 (8%)	206
Private individuals*	259 (16%)	216 (13%)	917 (56%)	36 (2%)	216 (13%)	1644
Local government / parish councils / other public bodies	154 (35%)	70 (16%)	171 (38%)	36 (8%)	16 (3%)	447
National representative bodies / professional bodies	19 (25%)	5 (7%)	46 (60%)	3 (4%)	3 (4%)	76
Businesses / house builders	41 (31%)	8 (6%)	69 (53%)	8 (6%)	5 (4%)	131
Overall Response	517 (21%)	331 (13%)	1312 (52%)	87 (3%)	257 (10%)	2504

Question 9a - The policies on minerals planning adopt the right approach.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	36 (17%)	38 (18%)	120 (54%)	4 (2%)	19 (9%)	217
Private individuals*	157 (9%)	255 (16%)	927 (57%)	23 (1%)	272 (17%)	1634
Local government / parish councils / other public bodies	81 (19%)	99 (24%)	221 (53%)	2 (1%)	13 (3%)	416
National representative bodies / professional bodies	19 (22%)	11 (13%)	49 (58%)	0 (0%)	6 (7%)	85
Businesses / house builders	28 (20%)	13 (10%)	91 (66%)	3 (2%)	3 (2%)	138
Overall Response	321 (13%)	416 (17%)	1408 (56%)	32 (1%)	313 (13%)	2490

* These responses largely reflected the issues raised by the principal campaigns.

Question 10a - The policies on housing will enable communities to deliver a wide choice of high quality homes, in the right location, to meet local demand.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	43 (12%)	139 (38%)	64 (17%)	2 (1%)	117 (32%)	365
Private individuals*	114 (4%)	652 (24%)	436 (16%)	49 (2%)	1502 (54%)	2753
Local government / parish councils / other public bodies	87 (14%)	264 (43%)	94 (15%)	12 (2%)	156 (26%)	613
National representative bodies / professional bodies	14 (13%)	29 (28%)	41 (39%)	9 (9%)	12 (11%)	105
Businesses / house builders	55 (28%)	40 (21%)	46 (24%)	32 (16%)	21 (11%)	194
Overall Response	313 (8%)	1124 (28%)	681 (17%)	104 (2%)	1808 (45%)	4030

Question 11a - The policy on planning for schools takes the right approach.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	37 (19%)	26 (14%)	109 (57%)	2 (1%)	18 (9%)	192
Private individuals*	175 (11%)	176 (11%)	974 (61%)	23 (1%)	246 (16%)	1594
Local government / parish councils / other public bodies	137 (33%)	82 (20%)	176 (42%)	0 (0%)	22 (5%)	417
National representative bodies / professional bodies	11 (15%)	12 (17%)	46 (65%)	2 (3%)	0 (0%)	71
Businesses / house builders	29 (23%)	12 (10%)	80 (64%)	3 (2%)	2 (1%)	126
Overall Response	389 (16%)	308 (13%)	1385 (58%)	30 (1%)	288 (12%)	2400

* These responses largely reflected the issues raised by the principal campaigns.

Question 12a - The policy on planning and design is appropriate and useful.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	82 (30%)	60 (22%)	84 (31%)	11 (4%)	35 (13%)	272
Private individuals*	195 (12%)	299 (18%)	753 (45%)	38 (2%)	388 (23%)	1673
Local government / parish councils / other public bodies	150 (31%)	144 (29%)	127 (26%)	24 (5%)	45 (9%)	490
National representative bodies / professional bodies	30 (31%)	14 (15%)	40 (42%)	5 (5%)	7 (7%)	96
Businesses / house builders	57 (37%)	28 (18%)	46 (30%)	11 (7%)	12 (8%)	154
Overall Response	514 (19%)	545 (20%)	1050 (39%)	89 (4%)	487 (18%)	2685

Question 13a - The policy on planning and the Green Belt gives a strong clear message on Green Belt protection.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	47 (15%)	89 (27%)	81 (25%)	10 (3%)	97 (30%)	324
Private individuals*	183 (7%)	565 (20%)	364 (13%)	55 (2%)	1617 (58%)	2784
Local government / parish councils / other public bodies	120 (20%)	165 (28%)	134 (23%)	40 (7%)	128 (22%)	587
National representative bodies / professional bodies	21 (22%)	20 (21%)	34 (36%)	7 (7%)	12 (13%)	94
Businesses / house builders	52 (29%)	33 (18%)	48 (27%)	26 (14%)	22 (12%)	181
Overall Response	423 (11%)	872 (22%)	661 (17%)	138 (3%)	1876 (47%)	3970

* These responses largely reflected the issues raised by the principal campaigns.

Question 14a - The policy relating to climate change takes the right approach.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	50 (21%)	53 (23%)	94 (40%)	4 (2%)	34 (14%)	236
Private individuals*	221 (13%)	282 (17%)	721 (42%)	29 (2%)	452 (26%)	1705
Local government / parish councils / other public bodies	134 (28%)	111 (24%)	195 (42%)	5 (1%)	22 (5%)	467
National representative bodies / professional bodies	26 (30%)	17 (19%)	32 (36%)	5 (6%)	8 (9%)	88
Businesses / house builders	55 (37%)	23 (16%)	55 (37%)	8 (5%)	8 (5%)	149
Overall Response	486 (18%)	486 (18%)	1097 (42%)	51 (2%)	524 (20%)	2645

Question 14c - The policy on renewable energy will support the delivery of renewable and low carbon energy.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	49 (24%)	30 (15%)	109 (54%)	0 (0%)	15 (7%)	203
Private individuals*	230 (14%)	280 (17%)	762 (46%)	32 (2%)	343 (21%)	1647
Local government / parish councils / other public bodies	148 (35%)	68 (16%)	182 (43%)	4 (1%)	20 (5%)	422
National representative bodies / professional bodies	15 (22%)	12 (18%)	37 (54%)	2 (3%)	2 (3%)	68
Businesses / house builders	52 (37%)	22 (16%)	54 (39%)	7 (5%)	5 (3%)	140
Overall Response	494 (20%)	412 (17%)	1143 (46%)	45 (2%)	385 (15%)	2479

* These responses largely reflected the issues raised by the principal campaigns.

Question 14e - 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.

Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	33 (17%)	32 (17%)	105 (55%)	1 (1%)	20 (10%)	191
Private individuals*	132 (8%)	274 (17%)	843 (53%)	20 (1%)	337 (21%)	1606
Local government / parish councils / other public bodies	107 (27%)	90 (23%)	172 (43%)	5 (1%)	24 (6%)	398
National representative bodies / professional bodies	13 (21%)	12 (19%)	36 (58%)	0 (0%)	1 (2%)	62
Businesses / house builders	41 (31%)	22 (17%)	55 (42%)	6 (5%)	7 (5%)	131
Overall Response	326 (14%)	430 (18%)	1211 (51%)	32 (1%)	389 (16%)	2388

Question 14g - The policy on flooding and coastal change provides the right level of protection.

Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	36 (18%)	42 (21%)	97 (49%)	4 (2%)	21 (10%)	200
Private individuals*	223 (14%)	249 (15%)	876 (54%)	19 (1%)	257 (16%)	1624
Local government / parish councils / other public bodies	123 (28%)	102 (23%)	160 (37%)	11 (2%)	43 (10%)	439
National representative bodies / professional bodies	19 (26%)	11 (15%)	36 (50%)	1 (1%)	6 (8%)	73
Businesses / house builders	49 (37%)	12 (9%)	57 (44%)	8 (6%)	5 (4%)	131
Overall Response	450 (18%)	416 (17%)	1226 (50%)	43 (2%)	332 (13%)	2467

* These responses largely reflected the issues raised by the principal campaigns.

Question 15a - Policy relating to the natural and local environment provides the appropriate Framework to protect and enhance the environment.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	35 (10%)	126 (35%)	68 (19%)	8 (2%)	127 (34%)	364
Private individuals*	108 (5%)	543 (22%)	355 (14%)	30 (1%)	1439 (58%)	2475
Local government / parish councils / other public bodies	94 (15%)	240 (40%)	135 (22%)	12 (2%)	130 (21%)	611
National representative bodies / professional bodies	20 (18%)	27 (24%)	41 (37%)	2 (2%)	21 (19%)	111
Businesses / house builders	90 (23%)	91 (24%)	127 (33%)	13 (3%)	63 (17%)	384
Overall Response	347 (9%)	1027 (26%)	726 (18%)	65 (2%)	1780 (45%)	3945

Question 16a - This policy provides the right level of protection for heritage assets.						
Type of Organisation	Agree	Disagree	Neither Agree or Disagree	Strongly Agree	Strongly Disagree	Totals
Voluntary sector / environmental groups / housing association etc.	46 (18%)	68 (26%)	75 (29%)	9 (4%)	60 (23%)	258
Private individuals*	169 (9%)	347 (20%)	590 (33%)	30 (2%)	626 (36%)	1762
Local government / parish councils / other public bodies	126 (26%)	164 (34%)	125 (26%)	14 (3%)	51 (11%)	480
National representative bodies / professional bodies	19 (20%)	22 (23%)	34 (36%)	1 (1%)	19 (20%)	95
Businesses / house builders	53 (37%)	18 (13%)	42 (30%)	12 (9%)	16 (11%)	141
Overall Response	413 (15%)	619 (23%)	866 (32%)	66 (2%)	772 (28%)	2736

* These responses largely reflected the issues raised by the principal campaigns.

Question 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?

Type of Organisation	Number of responses	%
Private Developer or House Builder	6	0.6
Housing Association or Registered Social Landlord	2	0.2
Landowner	3	0.3
Voluntary Sector or Charitable Organisation	90	9.9
Business, Consultant or Professional Advisor	33	3.6
National Representative Body	23	2.5
Professional Body	5	0.5
Parish Council	105	11.5
Local Government	154	16.9
Other Public Body	7	0.7
Other	6	0.6
Individual	473	52
Not Known/Blank	1	0.1
Total	908	100

* These responses largely reflected the issues raised by the principal campaigns.