

ECS EPSOM CIVIC SOCIETY

Shaping the future, safeguarding the past

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24 September 2024

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To Whom It May Concern

Proposed reforms to the National Planning Policy Framework – Responses from Epsom Civic Society

About Epsom Civic Society

Epsom Civic Society was founded in 1959 as Epsom Protection Society, at a time when many historic and architecturally valuable buildings and houses in Epsom and Ewell were being threatened by developers. Then, our primary role was to halt the destruction of Epsom's heritage and to ensure that new development was compatible with the traditional character of the town. In 2011, our name was changed to Epsom Civic Society. Our purpose continues to be to protect the heritage of Epsom and to encourage high standards of new planning and building; but the change of name reflects the wider concerns of the Society to promote civic pride and to inspire progressive improvement in the quality of local life for everyone. The Society is an unincorporated association with an executive committee and a constitution that requires us to prepare accounts and hold an annual general meeting. We have over 1500 members. The Society is a founder member of Civic Voice, the national charity for the civic movement in England, and shares common aims with other civic societies.

Responses are submitted on the Society's behalf by our Chair, Margaret Hollins, following consultation with and input from the Society's planning sub-committee members and Civic Voice.

Preliminary observations on this consultation, its local context and potential impact of proposals

Overview

We welcome this renewed commitment from central government to tackling ‘the lack of housing’ problem.

Locally, Epsom and Ewell Borough Council (EEBC) spent £1.67m on nightly paid accommodation in 2023/24 for **homeless households**; 160 homeless households were in temporary accommodation in the Borough and 90 homeless households in temporary accommodation outside Borough. Epsom and Ewell has pro rata one of the highest numbers of homeless households in temporary accommodation in England and is in the top 7 boroughs outside London (*EEBC paper - Housing pressures and homelessness: How EEBC is tackling a national issue 29 /8/24*).

Issues affecting housing delivery locally include:

- the **current standard methodology, and the adoption of the 2014 data as the base**, which has **created impossible targets in those areas of the country with ‘hard constraints’** (see further local details below) and takes no account of housing type and tenure mixes and the other priorities of place development (social, economic, environmental, design) which should have equal weight in each Local Plan
- the **failure of HMG to mandate and finance construction of social housing as a priority** over other types of development. All available evidence suggests that over the last 30 years social housing delivery is the key component of the housing mix that has been consistently lacking
- the **difficulty of assembly of sites** to enable major projects to be developed where the land is subject to multiple ownership
- the **constraint of the Green Belt**, which is seen as uniformly sacrosanct, whereas the term “Grey Belt” has some practical merit. Epsom’s Green Belt study identified a few small sites that could be so designated and provide development opportunities but are resisted to avoid precedent-setting
- specifically in terms of **delay in housing delivery**, para 11D of the NPPF has, in Epsom, led to a number of inappropriate housing applications being allowed on appeal, the larger of which *may never actually be developed* (eg Guild Living).

We do not support the proposed new Standard Method for assessing housing need for the following reasons (additional to those above):

- the Borough lacks a four- and five-year housing land supply, with total constraints of 59.6%, comprising 46% Green Belt and primary constraints at c.14%
- most major sites in the Borough are already built out

- [EEBC Annual Monitoring Report 1 April 2023 – 31 March 2024](#) demonstrates that housing completions for Epsom and Ewell mandated by the government’s standard methodology for calculating housing need have not been achievable (impossible to achieve) in recent years (despite meeting local Core Strategy (2007) minimum targets)
- the proposed new Standard Method results in a new target for EEBC of 817 homes pa (cf 569 previously) and is going to be **very challenging to meet without significant and irretrievable damage to the character of the Borough and the Green Belt leading to the Borough being at significant risk of being subsumed into London’s urban sprawl**
- delivery of such increased numbers would require massive development in the **Green Belt, which continues to perform strongly** against Green Belt criteria: “the area of designated Metropolitan Green Belt land within Epsom and Ewell is, on the whole, highly performing.” (Green Belt Study (2017), [Epsom and Ewell Green Belt Technical Note 2023](#)).
- risk of **proliferation of tower blocks in the pursuit of increased housing targets with consequent adverse impact on Epsom’s Town Centre Conservation Area, which remains on Historic England’s Risk Register**
- risk of **significant harm to the heritage and identity** of the Borough’s **21 Conservation Areas** through over-development
- the limited value of reliance on a single standard method of assessing housing need which lacks flexibility to respond to the protection of local heritage and identity

Limitations of market solutions

Underlying all issues identified above is the simple fact that private sector developers are market-driven, and not subject to government fiat, unlike LPAs.

HMG cannot force builders to build. They put their own capital at risk to buy land and build houses and hope to sell for a profit in due course. It is in their shareholders’ interests to keep house prices high, so they are motivated to start and complete just enough houses each year to keep their business running efficiently, and to use their resources to build the sort of housing which will generate the highest return on investment, not what society needs most.

HMG must recognise that markets cannot be controlled to the extent necessary to create a step function change in housing numbers, type, or location.

Providing some **motivation for developers to invest more on consolidating land parcels to enable larger schemes to be brought forward** might help.

Local Plans

A Local Plan for Epsom (and other areas with unmet social housing demand) that **prioritises development of social housing** would fail to achieve the required number of new dwellings but **would ensure that what development takes place would (i) reduce Housing Benefit etc costs and (ii) reduce demand and thus upwards pressure on market prices in Epsom at the bottom end of the market.** By reducing demand this would make starter homes fractionally more affordable for those who don’t qualify for housing benefit but can’t afford current open market prices.

Local plans will need to look more widely at:

- where to build (including identifying grey belt)
- building heights and densities - though still setting a maximum height
- getting developers for all sizes of developments (not just those building 10 homes or more) to contribute to infrastructure required and affordable homes needs
- encouraging more developments using modular, factory-built homes that can be rapidly assembled on site
- bringing more existing empty and underused properties back into use as part of how targets can be met (see Big issue article 21/11/23 on empty homes: <https://www.bigissue.com/news/housing/how-many-empty-homes-are-there-in-the-uk/>).

We would like to see policy changes that enable housing developments locally (and in comparable neighbouring boroughs) that meet the needs of less well-off residents (and would-be residents) in terms of affordability as well as EEBC goals re sustainability, tenure, and character – and that enable these types of new build to be reflected in the content of the local plan.

The Society's responses to specific questions (Nos 1 – 106) follow.

Chapter 3 – Planning for the homes we need

Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61? No. While consistency in the methods used to assess housing needs is helpful, flexibility is needed to enable local authorities to respond effectively to local circumstances, including the impact of local constraints, in determining housing numbers.

Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF? No. Local authorities should have more flexibility to ensure that local needs, eg for social housing, are met.

Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62? No comment.

Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130? No. We strongly believe that local character must be preserved, particularly in areas with heritage significance, such as Conservation Areas and Listed Buildings. Removing protections on density and height could pose a significant risk to these areas, potentially leading to inappropriate developments that harm the historic fabric of our towns and cities.

If this change were accompanied by stronger heritage protections, it may be more acceptable. However, without these safeguards, the policy risks irreparable damage to areas that

contribute significantly to the nation's heritage and economy (eg high street regeneration, retail provision, tourism). The balance between development and conservation is critical, and the NPPF must ensure that heritage protection remains at the forefront of planning policy.

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

Agree in part. In principle we support the move towards spatial visions that encourage higher density in new communities, but we stress the importance of ensuring that these areas remain liveable. Design guides should **promote varied densities and prioritise liveability, especially with respect to green spaces and community facilities**, ensuring a high quality of life for both existing and future residents.

Design guides must reflect local distinctiveness and allow flexibility. A one-size-fits-all approach for district-wide design codes risks becoming too generalised and may not adequately address the diverse characteristics across different areas. Instead, **we support a two-tier approach**: a broader district-wide design guide that sets out the character of different areas within the district, complemented by more specific design codes for larger development sites. This would ensure heritage protection while allowing room for local variation and innovation. It is essential that design guides and codes do not stifle creative development, particularly in areas with unique architectural features or where exceptions are necessary to reflect particular circumstances.

The government must **invest in building local authorities' design skills** and empower them to use design tools, such as design review, to ensure high-quality developments. Furthermore, we stress the importance of **up-to-date conservation area appraisals** to guide new developments, ensuring that the historic character of an area is respected while allowing for sustainable growth.

We recognise the need for **greater density** in certain areas, especially given the housing shortages, but **this must be done in a way that enhances both urban and rural quality**. Design codes should focus on creating liveable communities, incorporating green spaces, infrastructure, and community facilities. Density should not come at the cost of liveability or local character. Liveability is commonly more difficult to achieve at higher densities and additional requirements will be necessary in new developments, especially to provide a good environment for children (See our response to Q71).

Community input must shape design codes. Engaging local residents ensures that new developments meet the needs and aspirations of the community while respecting local identity. By embedding design codes into local plans, informed by both community engagement and conservation area appraisals, we can create places that respect local character while addressing housing needs.

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

Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status? No. It is impossible for us to agree to this, given the historic lack of a five-year housing land supply locally, with little prospect of the situation improving, given existing constraints on development in the Borough. We await the adoption of an up-to-date Local Plan (currently scheduled for 2026).

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

Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations? No. there is no strong justification for the 5% buffer on top of the 5-year housing land supply requirement. Increasing this requirement through the buffer appears arbitrary and could place additional strain on councils.

Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure? N/A

Question 11: Do you agree with the removal of policy on Annual Position Statements? Yes, given their infrequent use.

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

Yes, we support amending the NPPF to further encourage effective co-operation on cross-boundary and strategic planning issues. Housing, infrastructure, and environmental challenges rarely align with administrative boundaries, and without strategic co-operation, the ability to meet these needs comprehensively is significantly diminished. Effective cross-boundary collaboration is essential for ensuring that infrastructure and housing delivery are coordinated, particularly in relation to larger regional projects and developments that impact multiple local authorities. This is particularly important for addressing the housing crisis, transport connectivity, substantial modifications to the Green Belt and climate resilience, all of which require a coordinated approach across local authority boundaries.

This amendment presents **an opportunity to move away from a fragmented approach and towards more coherent, long-term strategic planning.**

Civic Voice supported the need for a **national spatial plan** in its response to the Planning White Paper in 2021, as advocated by the UK 2070 Commission. This would provide a valuable long-term framework for addressing spatial inequalities and guiding priorities such as renewable energy infrastructure, affordable housing, and sustainable development. Addressing the urgent challenges of climate change and renewable energy requires coordinated efforts across and within regions. Introducing a national plan for renewable energy infrastructure would enable schemes to be aligned with broader environmental goals and fast-tracked through the planning system. This reflects our broader belief that planning

must focus not just on immediate needs but on creating long-term, sustainable, low-carbon communities. **Given the presumed strategic focus of a national spatial plan on specific but major key areas, such as renewable energy infrastructure, then it seems more appropriate use of national planning than the previous government's proposals for National Development Management Policies which were more concerned with micro-managing local authorities' actions re planning.**

Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals? No comment.

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

A revised NPPF should also require Councils to use a standard methodology for the calculation of employment trends and cross district boundary commuting to work. The aim should be to promote a balance between housing and employment projections in every council district and, in particular, to avoid any strategic proposal that will lead to an increase in either inward or outward car-based commuting. The need for employment and housing land allocations should be considered together.

Meeting local housing targets should also include an analysis of empty residential properties in a local plan area with

- proposals over how these properties can be brought back into use as homes for people.
- how these numbers of empty properties brought back into use can help achieve housing targets.

Chapter 4 – A new Standard Method for assessing housing needs

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

Agree in part. Changing the target methodology alone will not resolve the fundamental issues surrounding housing delivery.

A consistent, nationwide benchmark, such as the standard method, is useful as a starting point for determining housing targets. Projection-based methods, which rely on historical data, often raise questions about their assumptions, leading to frequent revisions in targets that can cause uncertainty. A simpler, stock-based method, as proposed, could provide a more stable and predictable approach. However, the government's rationale for aligning the method with broader national housing market aspirations is not fully explained. While this shift could yield more balanced targets—perhaps lower in areas like London and higher in the North—the criteria for these adjustments need to be clearer. Transparency and fairness in assessing housing need should be ensured early in the Local Plan process, and clearer criteria

for Examiners and the public to understand the process to review these exceptions is essential.

Housing stock alone cannot fully capture housing need. The interaction between housing stock and household projections, especially the variations in occupancy rates across regions, is critical to understanding local housing needs. Failing to account for these factors, such as household size and local demand, risks producing skewed or inadequate estimates of housing requirements.

While the stock-based method offers a potentially more consistent baseline, it should be combined with considerations of occupancy rates and local factors to ensure more accurate and responsive housing targets.

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

Agree in part. The workplace-based median house price to median earnings ratio can be a useful indicator of housing affordability in a given area. Averaging this ratio over a three-year period helps capture longer-term trends rather than being skewed by short-term fluctuations, making it a more stable metric for assessing housing needs.

However, affordability is a complex issue that cannot be fully addressed by this ratio alone. The current definition of affordability—set at 80% of the market rate—remains out of reach for many, as it is still far beyond what average salaries can support. While adjusting the standard method's baseline using the house price-to-earnings ratio can provide a helpful starting point, we believe it should be used alongside other critical local data. Focusing solely on the workplace-based ratio risks overlooking vulnerable groups, such as those not in full-time employment or individuals earning below the median. To address the full spectrum of housing needs, the method should account for wider socio-economic factors, ensuring that new housing meets the needs of all community members—not just those in the workforce. This ensures that housing targets are realistic and aligned with sustainable development goals.

While we support the use of the median house price-to-earnings ratio as part of the standard method, we advocate for a broader, more nuanced approach. This should consider additional local factors and ensure that new housing is affordable, sustainable, and inclusive for all members of the community.

Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method? [The proposed changes involve applying a higher affordability multiplier.] No comment.

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

Yes, in principle. Housing affordability is not limited to home ownership; rental affordability is equally critical, particularly for those who cannot afford to buy a home. Rising rental costs can significantly impact housing security, and a more comprehensive housing needs assessment should reflect these pressures. To incorporate rental affordability, we suggest that the method include a comparison of median rent to median income within local areas, similar to the house price-to-earnings ratio used for home ownership affordability. This would allow the model to capture areas where rental costs are disproportionately high relative to earnings, highlighting where housing supply needs to increase or where there are gaps in affordable rental properties.

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

A comprehensive solution requires more active public sector involvement, stronger emphasis on social housing, and a reconsideration of the tax and land market structures that currently drive unaffordability. Chapter 3, paragraph 6 states (inter alia) “Authorities would be able to justify a lower housing requirement than the figure the method sets on the basis of local constraints on land and delivery...” which the revised NPPF should confirm and make clear.

Chapter 5 – Brownfield, grey belt and the Green Belt

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

Question 21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of Previously Developed Land in the Green Belt?
Yes, supported by planning guidance, eg as regards height and volume limits, to ensure consistency with landscape character assessment.

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

Expanding the definition of PDL could lead to the loss of productive agricultural land, particularly in rural areas, where the balance between development and land preservation is delicate. Glasshouses and other horticultural facilities are an essential part of our rural economy and food security, and their protection should be prioritised. If the definition of PDL is to be expanded, it must exclude land used for horticultural and agricultural purposes to avoid jeopardising local food production.

Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend? No.

If the 'Grey Belt' concept is adopted, (and we are not convinced that it is necessary, given existing procedures for Local Plans and planning applications to release Green Belt under 'exceptional circumstances' and 'very special circumstances' respectively) we recommend the following changes to the definition of grey belt land:

1. **Limiting development to specific circumstances:** development should only take place where a council does not have an up-to-date local plan and has not met its housing delivery targets; and
2. **Requiring proximity to existing settlements or transport hubs:** development on grey belt land should be an extension of existing communities or located near railway stations to ensure sustainability. This approach would prevent free-standing, scattered rural development, which is often unsustainable and can harm the character and integrity of rural areas; and
3. **Preventing scattered rural development:** isolated developments disconnected from existing infrastructure or communities should not be permitted.

A simpler, though more restrictive amendment, put forward by the Town and Country Planning Association would be to **include only Previously Developed Land** where its development does not conflict with the five Green Belt purposes.

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

A clear benchmark should be set at 2024. With the availability of high-quality aerial and satellite imagery, each local authority with Green Belt land should establish a 2024 imagery database. This would provide a definitive baseline against which any future degradation of Green Belt land can be assessed. By using up-to-date imagery, local authorities can more effectively monitor changes and ensure that high-performing Green Belt land is not inappropriately reclassified or degraded to meet grey belt criteria. This would help protect the integrity and purpose of the Green Belt.

Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance? No. Nothing more is needed if the only PDL allowed for redevelopment in the Green Belt is an extension to a settlement or railway station.

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

It is important that the guidance includes an assessment of the social, environmental, and community value of the land.

This could involve:

- **Public accessibility:** does the land provide valuable open space for recreation or community use, even if it is not high environmental quality?
- **Biodiversity:** does the land support local wildlife or form part of an important ecological corridor?
- **Heritage considerations:** does the land contribute to the historical or cultural landscape of the area?
- **Flood risk and climate resilience:** does the land play a role in managing flood risk or contribute to carbon sequestration?

Additional criteria like these could help ensure that decisions about Green Belt land release or development are fully informed and reflect a comprehensive understanding of the land's broader value to local communities and the environment.

Green Belt policy needs to be modernised to be more 'multifunctional' so that its purposes extend to supporting the wellbeing of communities, embracing environmental or social benefits, climate and nature.

Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced? Yes. Local Nature Recovery Strategies should be part of a development plan or possibly a supplement to a development plan. They should be prepared promptly and publicised, should be co-ordinated with 'green and blue' strategies and should identify sites that will be protected from development. Nature Recovery Strategies are especially important in identifying habitats and biodiversity clusters that have been previously missed in official classifications. They also offer the potential of a new, online way of public consultation based on the principles of citizen science and are to be welcomed for this reason.

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

We support the principle of prioritising the release of previously developed land (PDL) and Grey Belt land (if the Grey Belt concept is adopted) before considering green belt sites for development. However, we believe that careful consideration must be given to ensure that the release of such land is done in the most sustainable locations, taking into account local infrastructure, transport links, and community needs. A plan-led approach is essential. Identification of grey belt land should be done with caution. Development on such sites should be limited to areas that are well-connected to existing infrastructure, such as extensions to settlements or sites near public transport hubs, to avoid unsustainable, scattered development in rural areas. This will help protect the integrity of the countryside while addressing housing needs in a planned and responsible manner.

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

Yes, but the key question is who should determine whether the function of the Green Belt is being undermined and how they should do this. The release of land should not fundamentally undermine the function of the Green Belt.

The Green Belt plays a critical role in preventing urban sprawl, protecting the character of rural communities, and maintaining valuable open spaces. The need to prevent urban sprawl was recognised when the present national pattern of Green Belts was established in the 1950s and 1960s. Any fundamental review should be undertaken at a similar spatial scale. Release of land from the Green Belt should be done cautiously and only in exceptional circumstances where there is a clear, demonstrated need for development. In such cases, the planning system must ensure that the core purposes of the Green Belt are preserved and that any land release does not lead to a piecemeal erosion of its integrity. Additionally, it is essential that decisions to release Green Belt land are made through a plan-led process, with thorough community consultation to ensure that local views are considered. This will help maintain public trust in the planning system and ensure that Green Belt land is only released in a controlled and responsible manner, with careful consideration of the wider impacts on the environment and community.

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

Ideally this approach should not be adopted until at least 2 years have elapsed from this significant change of policy, to allow time for at least some initial appraisal of Green Belt, Grey Belt and PDL in the Green Belt. This would give authorities the incentive to get on with this appraisal and to at least have up to date information on which to base its decision, even though the work would need to be followed up through the updating of their development plan. It would also encourage development of urban sites first, which if they current fall within the 'too difficult' category will otherwise be left behind completely. A 2-year gap may, however, be unrealistic given the govt's intention to get 1.5m homes built in 5 years, since it would only leave 3 years for some developments to be approved and built.

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

Releasing grey belt land for commercial purposes must not lead to piecemeal or speculative developments that undermine the character of local areas or create pressure on already stretched infrastructure. Commercial developments on grey belt land should only be permitted where they are well-connected to existing infrastructure, such as near public transport hubs or as part of an extension to existing settlements. This will help to ensure that

new commercial developments do not exacerbate traffic issues or increase car dependency, which would counter the sustainability goals outlined in national planning policy. Local communities must be consulted to ensure that developments align with their needs and aspirations, particularly where commercial projects may have a significant impact on local amenities and the environment.

While grey belt land might be released under certain conditions, we remain committed to protecting the overall integrity of the Green Belt and only support release when there is clear evidence that it will not harm the broader Green Belt function. Any decision to release grey belt land should be driven by a plan-led process, ensuring that local authorities have up-to-date development plans that consider long-term sustainability, local infrastructure capacity, and community needs.

Question 34: Do you agree with our proposed approach to the affordable housing tenure mix? Yes.

We support the government's proposed approach to the affordable housing tenure mix, particularly the focus on providing a variety of housing options that meet the diverse needs of communities. Maintaining clear and realistic targets for affordable housing provision is vital. Developers should not be allowed to deviate from these targets due to viability issues without thorough justification and transparent review. This ensures that the mix of affordable housing is tailored to the specific needs of the local community, with a transparent and accountable process to guide decision-making.

While promoting affordable home ownership is important, this focus should not overshadow the pressing need for more social rent housing. True affordability remains out of reach for many, especially in high-cost areas, and there is a need for significant public sector involvement to meet these needs. Therefore, we advocate for a balanced approach that prioritises social housing provision alongside affordable home ownership.

The challenge for the govt is how to avoid being at the mercy of private developers / builders in delivering affordable social rent homes. There should be scope to have small but significant high-quality public-sector builders that could help keep prices competitive and show it is possible to deliver affordable social rent homes. Like the role District Audit Service played in external audit of local authorities when the (now abolished) Audit Commission allocated work to private sector and public sector.

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

Ideally the 50 per cent affordable housing target should serve as a baseline indicator across all Green Belt areas, including previously developed land (PDL) within the Green Belt, although we query how this will work in practice in terms of delivery.

Local authorities are best placed to understand the specific housing requirements in their areas, should have the flexibility to set targets.

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

Yes, subject to the following qualifications:

- The inclusion of a reference to existing residents as well, where development is on their doorstep.
- Compensatory public open space improvements and biodiversity safeguards should be routinely used in the development of former Green Belt sites.

Question 37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development? A wider policy review is necessary. Benchmarking land values cannot be confined to Green Belt or Grey Belt sites. Land values within a Green Belt do not stand in isolation. They depend on values in the vicinity.

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

We support the Government's proposal to reduce the scope of viability negotiation when land transacts above the benchmark land value. This approach is aligned with our broader view that viability assessments often lead to a reduction in community benefits, including affordable housing. By setting a clear threshold for when viability negotiations are permitted, this policy would help create greater certainty for local authorities, developers, and communities.

The benchmark land value must be carefully and transparently set to reflect local market conditions while ensuring that public benefits are prioritised. Reducing the scope for negotiation would help prevent developers from using viability claims to avoid policy requirements, such as affordable housing contributions, which are critical to meeting local needs.

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

We believe that the proposal to exclude additional contributions for affordable housing where development is policy compliant could have a detrimental effect on the delivery of social housing. Given the significant variability in land values across different areas, it is essential that affordable housing remains a key component of community requirements. In many cases, the provision of affordable housing is already challenging due to high land values, particularly in more desirable locations. If additional contributions are restricted, it could lead to missed opportunities for delivering affordable homes in areas where they are most

needed. The flexibility to seek further contributions beyond the base policy is crucial to ensure that housing developments meet the full spectrum of community needs, particularly in relation to affordability. Affordable housing must remain an integral part of the contributions sought from developers, ensuring that local authorities can respond to the specific needs of their communities and maintain a balance between market and social housing provision.

Question 41: Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? Yes. What support would local planning authorities require to use these effectively? Experienced land valuers, who maybe could be from a national panel, vetted by government.

Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers' sites and types of development already considered 'not inappropriate' in the Green Belt? No comment.

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

A consistent start date should be set for all Green Belt sites, including those released through a Green Belt review in an adopted, up-to-date development plan. This approach aligns with the broader principle of ensuring transparency and fairness across the planning system. Applying the same valuation rules to all Green Belt sites, regardless of when they are made available for development, helps avoid disparities and arbitrary outcomes.

Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?
No.

Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32? No

Question 46: Do you have any other suggestions relating to the proposals in this chapter?
No

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

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

The need for Social Rent housing is significant, particularly in areas where the affordability crisis is most acute. Social Rent provides a truly affordable option for individuals and families who are priced out of the housing market and even other forms of affordable housing such

as shared ownership. It is critical that housing needs assessments and policies explicitly prioritise Social Rent to ensure that housing developments meet the needs of the most vulnerable and disadvantaged members of society.

Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership? No. We do not support the removal of the requirement to deliver 10% of housing on major sites as affordable home ownership. However, we do feel that it is important to specify the type of affordable home ownership product (eg shared ownership, first homes etc) in the NPPF guidance. It is also important to specify the definition of a 'major site'.

A balance is needed between home ownership and the provision of other affordable tenures, such as social rent, and affordable rent, to meet the diverse housing needs within communities. Rather than removing the 10% requirement, we recommend that local authorities retain the flexibility to adjust the mix of affordable housing based on local needs, as determined through their local plans and supported by community consultation. Requiring a minimum of 10% affordable housing provision is fine but it should not be confined to affordable home ownership.

Question 49: Do you agree with removing the minimum 25% First Homes requirement? No, but the percentage could be reduced, to make room for social rent housing.

Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites? First Homes on exception sites should be tied specifically to meeting local needs, especially in rural areas where local people are being priced out by incomers. Based on an up-to-date housing needs assessment.

Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types? Yes, but the reference to mix should be elaborated in more detail to include an additional criterion of dwelling size. The policy should be to promote developments that have a mix of tenures and types, including dwellings of varied size and number of bedrooms. On small sites, size and tenure should be controlled to ensure a balance within the locality, taking into account the characteristics of the existing stock.

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

There are various ways. Ensure that local plans include specific guidance on the percentage of social rent and affordable rent on major sites. Prevent housebuilders from seeking changes to planning agreements on the grounds of viability so that social rent and affordable rent numbers are not reduced significantly. Support housing associations and councils to purchase land (including use of compulsory purchase) on brownfield sites and lead on development to ensure a high proportion of social rent and affordable rent while maintaining a tenure and house type / size mix. Ensure that surplus publicly owned land (eg NHS and Ministry of

Defence) is masterplanned before disposal to include significant amounts of social rent and affordable rent numbers.

Question 53: What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate? There was no maximum size when council houses were built in the 50's, 60's and 70's and those estates worked well for those needing rented accommodation, until many properties were sold off under the right to buy.

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

To better support and increase rural affordable housing, Civic Voice recommends the following measures:

1. Strengthening the use of rural exception sites to allow affordable housing developments in small villages and rural areas where market housing might not be permitted. These should prioritise affordable and social rent housing for local residents, addressing the issue of local people being priced out by wealthier incomers.
2. Encouraging and providing financial support for community-led housing schemes in rural areas. This can empower local communities to create affordable homes that meet specific local needs, with initiatives such as Community Land Trusts (CLTs) playing a key role.
3. Allowing local authorities more flexibility to set affordable housing targets and tenure mixes that reflect the specific needs of rural areas. Local needs assessments should ensure that the housing delivered meets the demands of low-income families, key workers, and younger generations who wish to remain in their rural communities.
4. Increasing investment in rural infrastructure, such as public transport, broadband, and services like schools and healthcare, to make rural affordable housing developments more viable and attractive. This will help ensure that residents in rural affordable housing are not isolated and can easily access essential services.
5. Providing grants or subsidies for local authorities and housing associations to acquire land for affordable housing in rural areas. The cost of land is often a barrier to rural development, and reducing this cost can make affordable housing projects more feasible.
6. Supporting self-build and custom-build projects that provide affordable housing options in rural areas. Local authorities should be encouraged to allocate suitable land for these projects, which can be a cost-effective way for local people to build their own affordable homes.
7. For all rural areas, apply a rule that all sites (including those with less than 10 units) must deliver a proportion of affordable housing.
8. Use prefabricated modular build and environmentally sustainable options to cut cost of building new homes in rural as well as urban areas.

By adopting these measures, the government can help ensure that rural areas have a sustainable supply of affordable housing that meets local needs while maintaining the character and vitality of rural communities.

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

Yes – meeting the needs of looked after children has been a badly neglected issue in national and local planning policies.

Question 56: Do you agree with these changes? [to the definition of community-led development and the size cap for community-led exception sites]

Yes and we would support recommendations made by the Community Land Trust who are the experts in this area.

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

Yes, we think it should be amended. We agree with making it easier for community-led developers and almshouses to develop affordable homes. We also strongly recommend that there should be specific reference to social rent (approximately 50% of market rent) and affordable rent (up to 80% of market rent).

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

The Community Land Trust will have specific feedback about small sites coming forward for community-led development. Communities have proven adept at identifying sites and winning local support, including in sensitive locations such as urban open space, back gardens and garages.

Small sites offer an important contribution to meeting local housing and other needs. The use of small sites is especially useful in encouraging in community-led development. In addition, the allocation of small sites helps focus development on existing urban areas, promoting population and economic development in those areas and without the negative implications of green field development.

However, faced with target numbers, Councils do not have a great incentive to use their staff resources to find small sites. Sometimes the development plan background papers explicitly include a minimum threshold size for sites that are identified and assessed. The consultation process in local plan preparation including the examination in public is, in any case, dominated by larger property interests. Patterns of fragmented land ownership and unrealistically high ‘hope values’ are other constraints.

Local councils should be required to demonstrate how they have searched for small sites in urban areas and should be barred from applying a blanket minimum size threshold. To facilitate the development of small sites, government may need to review the law covering municipal land acquisition, assembly and compensation.

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

Yes, we support the proposal to retain references to well-designed buildings and places while removing the subjective terms 'beauty' and 'beautiful' from the Framework. We believe that design should focus on practical, measurable elements that contribute to the quality and functionality of a place. Terms such as 'beauty' are highly subjective and can be difficult to define or enforce through planning policy, leading to inconsistency in interpretation and application. Focusing on well-designed, functional spaces that serve the needs of the community is more in line with the objective of creating sustainable, liveable environments. Good design should prioritise local character, functionality, accessibility, and sustainability.

Removing vague terms like 'beauty' ensures that design standards can be more effectively measured and adhered to in planning and development.

Question 60: Do you agree with proposed changes to policy for upwards extensions? Yes.

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

Design should be given a higher priority in plan making, including strategic spatial planning. Development plans should be seen as more than mechanisms for land use allocation; they should actively promote high-quality design that enhances the character and functionality of local areas.

The National Planning Policy Framework (NPPF) should explicitly integrate the importance of good design into the core aims of plan making, particularly in paragraph 16 of the existing document.

Chapter 7 – Building infrastructure to grow the economy

Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF? Yes, BUT this is so far a missed opportunity to specifically help the renewable energy industry. Manufacture of equipment for commercial and domestic use i.e. wind turbines, heat pumps should also be given a specific mention for support.

Question 63: Are there other sectors you think need particular support via these changes? What are they and why? Manufacture of equipment for commercial and domestic use i.e. wind turbines, heat pumps should also be given a specific mention for support.

Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime? Yes, if government intends to support this with the appropriate level of staff resources to cope to ensure a speedy decision-

making process. It should also allow renewable energy equipment manufacture and schemes to be included.

Question 65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so? Yes, it needs to be large scale developments. Local authorities and thus communities need to be involved in the decision making on smaller scale development. Each type of development would probably need its own limit set.

Question 66: Do you have any other suggestions relating to the proposals in this chapter?
No.

Chapter 8 – Delivering community needs

Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF? Yes, and this requirement of national planning policy should be given some publicity. How much of the local authority planning work is proactive and positive with promoters etc at the moment?

Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?
Yes, but the wording of a) needs to include ‘provision of’ after the word alter.

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

Yes, subject to the comments below.

We support the general intent of the changes proposed to paragraphs 114 and 115, particularly the rejection of the outdated ‘predict and provide’ model in favour of a vision-led approach to transport planning. The ‘predict and provide’ method has proven to be far too costly in terms of road construction and improvement, and its environmental impacts would be disastrous if continued. A vision-led approach, which integrates transport and land-use planning, is essential for creating sustainable, connected, and walkable communities. However, the proposed revisions are somewhat oversimplified and should address the traffic-generating potential of business growth in peripheral locations. There is a potential conflict between the ‘vision-led’ transport approach and the more liberal, ‘anything goes’ assumptions in other aspects of the consultation that deal with economic growth. Without careful coordination, business growth on the urban fringe may lead to increased car dependency, undermining the sustainability goals of the vision-led transport strategy. We would also emphasise the need for community involvement in shaping transport plans. Engaging local communities, including civic societies, will ensure that transport and infrastructure decisions reflect the real needs of the people who live and work in these areas. The success of this approach will rely on proper investment in public transport networks, cycling and walking infrastructure, and ensuring that these options are accessible and affordable for all.

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

National planning policy can better support local authorities in promoting healthy communities by giving greater emphasis to health and well-being considerations in both policy and practice. While the National Planning Policy Framework (NPPF) includes a chapter on healthy and safe communities, it lacks sufficient focus on practical measures in planning practice. To address this, national policy should:

Promoting healthy communities:

- **Promote active travel more explicitly:** Active travel, such as walking and cycling, should be a core element of local development plans, with priority given to creating safe pedestrian and cycling routes. These routes should be away from the noise, pollution, and dangers of heavy traffic. A long-term investment programme is needed to ensure safe, clean, and accessible active travel infrastructure. In addition, planning documents should routinely include pedestrian routes from city centres to transport hubs, ensuring that walkability is prioritised in central area regeneration efforts.
- **Encourage walkable and mixed-use communities:** National policy should promote developments where homes, schools, shops, and leisure facilities are within walking distance of each other. Walkability is key to fostering active, healthy lifestyles and reducing car dependency.
- **Increase public investment in community facilities:** Developing healthy communities requires a publicly led vision and adequate investment in local health, leisure, and fitness facilities. These should be a priority in development plans to provide accessible spaces that promote physical and social well-being.

Tackling Childhood Obesity:

To effectively tackle childhood obesity, national planning policy must address the built environment's impact on children's health. Current NPPF proposals mention active travel and controlling hot food takeaways, but neither is given sufficient emphasis. Civic Voice recommends:

- **Controlling hot food takeaways near schools:** Local authorities should have clear powers to create exclusion zones for fast-food outlets near schools, including secondary schools, to limit children's exposure to unhealthy food options. The legitimacy of such controls should be explicitly recognised in the NPPF. While this policy requires minimal public investment, it may face opposition from businesses, so strong national guidance will be essential.
- **Encouraging play-friendly environments:** Safe, accessible play areas must be integrated into both residential and commercial developments to encourage physical activity for children. National policy should guide local authorities to ensure that these spaces are a key part of urban design.
- **Improving school infrastructure for active travel:** Schools should be better equipped with walking and cycling routes that allow children to safely travel on foot or by bike. This includes designing school neighbourhoods that promote active travel, along with

community-led initiatives like walking buses. Active travel to schools should be part of long-term development planning.

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

National planning policy that encourages the retention and creation of open spaces that are large enough to accommodate proper play areas, particularly in and around schools.

In many new housing developments, open spaces are often fragmented into small parcels, which are insufficient for children to engage in activities such as ball games or bike riding. This issue can be addressed through clearer guidance in design guides and codes. Under the heading of design codes, local councils are required to specify requirements for all types of new housing and development. These codes should explicitly focus on creating healthy, child-centred environments.

As current policies and market trends lead to higher-density living, particularly in urban centres, it is crucial to ensure that families with children have adequate indoor and outdoor spaces that support healthy lifestyles.

For higher-density and high-rise housing, the following considerations should be explicitly included in policy and design requirements:

- Increased minimum internal floorspace to allow children to play indoors in the absence of a garden, ensuring that homes are fit for family life.
- Enhanced minimum standards for access to green space, ensuring that children living in flats or dense urban areas have easy access to well-maintained, safe outdoor areas where they can play and be active.
- Enhanced standards for tree planting and greenery in streets, providing a more liveable and visually appealing environment that promotes well-being for all residents.

By focusing on these measures, local authorities can help create environments that support children's physical and mental health, ensuring that urban living does not compromise their ability to grow and thrive. National policy should make it clear that new developments must contribute to this vision by ensuring sufficient, usable green spaces and family-friendly design standards.

Chapter 9 – Supporting green energy and the environment

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

While we support onshore wind projects, they must be carefully balanced with robust mechanisms for ensuring meaningful community engagement in NSIP processes. A greater financial incentive to local communities to benefit from such schemes would also help.

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

Yes.

We agree with the proposed changes to the NPPF that aim to provide greater support for renewable and low carbon energy, with the additional qualification that the delivery of renewable energy projects must still respect the policy constraints associated with heritage areas and protected sites, such as Areas of Outstanding Natural Beauty (now retitled as Areas of National Landscape) and National Parks. We also agree with the changes to paragraph 160 (now paragraph 161), which directs local plans to identify suitable areas for renewable and low carbon energy generation. It is vital that these areas are identified at the local or national level before schemes are brought forward. This proactive approach ensures that opportunities for renewable energy are properly considered through the plan-making process, allowing the most appropriate sites to be identified while taking local needs and constraints into account.

The existing wording in the NPPF has acted as an effective ban on onshore wind development, which has hindered the growth of this vital renewable energy source. We agree with the government's view that while the previous bar for community consent was set too high and unfairly singled out onshore wind.

We also stress the importance of community-led energy projects, which should be actively encouraged. For this reason, we do not agree with the deletion of paragraph 161, as community-led energy schemes are a key part of empowering local communities to participate in renewable energy generation.

The strengthened weight given to renewable energy generation in paragraph 164 is also welcome.

Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place? Yes. Support additional protections for habitats such as peat soils and urges the government to adopt a precautionary, evidence-based approach to safeguarding land that offers critical carbon sequestration functions.

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

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

Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be? No comment

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

Climate change mitigation and adaptation requires wide ranging policy interventions, including measures that are outside the current scope of planning and therefore not included in this Consultation. Measures to improve the energy characteristics and quality of new build and the existing stock are, for example, obvious and serious omissions from this Consultation. In relation to the existing scope of planning, future specific deliverable initiatives should include the following:

1. Local councils should be required to prepare 'green and blue' strategies that cover green infrastructure and bodies of water. They would include proposals and policies for urban forests, green roofs and biodiversity corridors, the preservation of existing green spaces, the promotion of new green spaces in areas of deficiency, the promotion of adequate space for water at times of high rainfall and flooding and the promotion of safe leisure uses in and around water bodies. These green and blue strategies would overlap measures to improve community health and well-being and to ensure nature recovery and would become an integral part of a local development plan.
2. To reduce car dependency, national planning policy should require new developments to be built around sustainable transport infrastructure, such as public transport hubs, cycling routes, and pedestrian pathways. Policies should ensure that developments are designed to reduce the need for car travel, supporting more walkable, transit-friendly communities.
3. The development, repair and extension of hard-standings and car parks should be better controlled to reduce surface run-off. Materials and building techniques should be used to allow water to soak into the ground. Layout should also include vegetated areas that have the same function of reducing run-off. As well as flood protection, the reduction of run-off is relevant to measures to reduce sewage discharges and to improve water quality in lakes, streams and rivers.
4. New conditions should be placed on new industrial and commercial development so that they include solar panels on their roofs or in their grounds.
5. For areas covered by an existing or planned district heating network, councils should be clearly mandated to ensure that all new development is linked to that network.

Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use? No comment

Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness? Yes.

Yes, the rigid enforcement of existing policies to prevent and control development on sites that are classified at risk of flooding. In addition to this, it would be desirable for maps of flood risk to be made available on the planning portal of every planning authority so that developers and the public have easier access to the relevant information. Promotion of flood resilience, including greater awareness and understanding of the risks of groundwater flooding and appropriate measures for mitigation.

Question 81: Do you have any other comments on actions that can be taken through planning to address climate change? Recognising that this will create a cost implication on property owners, so may require further government support, where existing buildings are being given a new lease of life or being increased in size (out or up) it should be a requirement that the whole building be brought up to an energy efficiency level of A or B.

Question 82: Do you agree with removal of this text from the footnote? If this footnote is removed, para 180 of the NPPF should be changed to move the phrase about best and most versatile agricultural land into its own subsection to give it more prominence. And the subsection needs to include reference to the importance of retaining this land for food production, giving it significant weight in the planning balance.

Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production? If this footnote is removed, para 180 of the NPPF should be changed to move the phrase about best and most versatile agricultural land into its own subsection to give it more prominence. And the subsection needs to include reference to the importance of retaining this land for food production, giving it significant weight in the planning balance.

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

Question 85: Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes? No comment

Question 86: Do you have any other suggestions relating to the proposals in this chapter? No comment

Chapter 10 – Changes to local plan intervention

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

Questions 88-105 – no comment (Qs 89 – 105 – Changes to planning application fees and cost recovery etc)

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

To mitigate potential impacts, we recommend:

1. **Inclusive design standards:** ensuring that all new developments meet high accessibility standards, particularly in public spaces and housing, to support people with disabilities and the elderly.
2. **Affordable housing:** prioritising social housing provisions to ensure that low-income families and vulnerable groups have access to suitable housing options.
3. **Community engagement:** making consultation processes accessible to all, including providing alternative formats for information and ensuring that public meetings and forums are held in accessible venues.

We are also concerned at the **timing** of the Government consultation, which took place during the summer holidays, may have limited the ability of certain groups to fully engage in the process. This includes families with school-aged children, individuals who may have been on holiday or balancing additional responsibilities during this period.

To mitigate this, we recommend that future consultations avoid periods like school holidays and allow for extended consultation periods to ensure that all groups, particularly those with protected characteristics or those who may have additional time constraints, have ample opportunity to participate fully and provide their input. This would help create a more inclusive and representative consultation process.

The **lack of Government impact assessments** of proposed policies on groups with protected characteristics, in the consultation document, continues a disappointing practice followed by the previous government in its planning consultations. The inclusion of impact assessments, that consultees can respond to, needs to be reinstated immediately.

This concludes the response from Epsom Civic Society to this consultation.

Yours faithfully,

Margaret Hollins

Chair of the Committee
Epsom Civic Society

