



**DLUHC Consultation**  
**Levelling-up and Regeneration Bill: reforms to national planning policy**  
**Response by National Parks England**  
**February 2023**

National Parks England (NPE) exists to provide a collective voice for the English National Park Authorities. Our response to the DLUHC's [proposed reforms to national planning policy](#) consultation represents the collective view of officers working within the policies established by the National Park Authorities. Individual authorities may submit separate responses, which will draw on the specific issues for their particular area.

In our role as the statutory planning authorities for our respective areas, National Park Authorities collectively cover around 10% of the land area of England and are home to over 300,000 people. Our consultation responses to the proposed reforms to national planning policy are set out on the following pages. The consultation sets out 58 questions, many of which are housing and growth focused and not directly related to our work. Set out below is a summary of the main elements of our consultation response.

**National Park England consultation response – Summary**

- The revisions to national planning policy – including the proposed new National Development Management Policies - and the approach to addressing housing needs provide an opportunity to incorporate the relevant sections in the National Parks Circular (2010), already cross-referenced in the current NPPF and NPPG.
- National Parks should be specifically highlighted as a factor in the revised Framework which justify a local housing needs assessment to be undertaken.
- Revisions to national Green Belt policy should not result in development pressures being pushed into nationally protected landscapes (including National Parks).
- The revisions to the NPPF should differentiate between small-scale local wind turbines and larger scale on-shore wind farms.
- The proposed elevation of national policy to the same legal status as the statutory 'development plan' is a fundamental change to the existing Plan-led system. For this change to be justified, National Development Management Policies should be subject to full consultation and scrutiny, with the process for producing and reviewing National Development Management Policies set out in legislation.

- There is justification for elevating the existing NPPF policy wording on National Parks into the National Development Management Policies. It will be important that national policies can be supplemented by more detailed local policies prepared by the respective National Park Authorities through their Local Plans.

If you require any more information or have any questions regarding this consultation response please contact us – our contact details are set out below. We would also be happy to assist DLUHC officers on any of the detailed points raised in the National Parks England response; and on future reviews of national planning policy as may affect National Parks.



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Question Number	Question Wording
1	<b>Do you agree that local planning authorities should not have to continually demonstrate a deliverable five- year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than five years old?</b>
NPE response	<p>Agree. National Park Authorities (NPAs) are not covered by the Housing Delivery Test. However, some NPAs seek to maintain a 5-year housing land supply within the context of nationally protected landscapes and their adopted development plans. Others set policies that enable delivery in response to need alongside pro-active programmes to find and develop sites in response to their Park-specific circumstances.</p> <p>The proposal is therefore supported and reinforces the role of up-to-date plans in decision-making. The current situation where planning authorities have to demonstrate housing land supply on a rolling annual basis undermines the role of the Plan-led system, especially for Plans that have recently been independently assessed at examination and found 'sound'. A national requirement to demonstrate a continuous 5-year housing land supply that includes National Parks could conflict with the statutory National Park purposes set out in primary legislation.</p>
2	<b>Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?</b>
NPE response	<p>Agree. National Park Authorities (NPAs) are not covered by the Housing Delivery Test. However, some NPAs seek to maintain a 5-year housing land supply within the context of nationally protected landscapes and their adopted development plans. Others set policies that enable delivery in response to need alongside pro-active programmes to find and develop sites in response to their Park-specific circumstances.</p> <p>The current system essentially requires planning authorities to identify a minimum 6-year supply of housing land and this has encouraged planning by appeal, undermining the role of the statutory development plan. The change strengthens the role of the Plan-led system and is supported.</p>
3	<b>Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?</b>
NPE response	Yes. It is logical that an assessment of the supply of new dwellings should be taken into account when calculating housing land supply.

<b>4</b>	<b>What should any planning guidance dealing with oversupply and undersupply say?</b>
NPE response	There is merit in Government guidance including a formula for all planning authorities to use when producing their 5-year land supply statement. It would be helpful for the NPPG to provide clarity on the relevant time period within which previous supply should be considered.
<b>5</b>	<b>Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?</b>
NPE response	We support proposals to offer further protection to Neighbourhood Plans, which go through public consultation, independent examination of the evidence base and representations, and form part of the statutory development plan once 'made'.
<b>6</b>	<b>Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?</b>
NPE response	<p>Yes, on the understanding that the revisions to the Framework recognise the balance required in planning decisions across environmental, social and economic objectives. The planning system plays a key role in the delivery of homes and other development that communities need. Our respective planning application caseloads highlight the role National Park Authorities play as planning authorities in delivering sustainable development. This involves balancing considerations such as landscape protection, safeguarding the heritage of the built environment, addressing climate change, increasing biodiversity, supporting the socio-economic well-being of our communities, facilitating public enjoyment of the National Parks and meeting identified local development needs. It is important that all these elements of sustainable development are delivered in a balanced way and none of these are given pre-eminence in policy.</p> <p>Chapter 2 of the current NPPF (2021) confirms, "...the purpose of the planning system is to contribute to the achievement of sustainable development...achieving sustainable development means the planning system has three overarching objectives [economic, social and environmental] which are interdependent and need to be pursued in mutually supportive ways." The proposed revisions to the opening chapters of the revised Framework should retain this balance. The focus on housing delivery in the Framework should therefore also recognise the wider role planning plays in protecting and enhancing the environment and delivering the statutory purposes of National Parks.</p>

<b>7</b>	<b>What are your views on the implications these changes may have on plan-making and housing supply?</b>
NPE response	<p>This is a useful clarification and represents a balanced statement to guide Plans in meeting identified housing needs.</p> <p>The proposed revisions to paragraph 35 require Plans to be ‘positively prepared’ - providing a strategy which seeks to meet the area’s objectively assessed needs so far as possible, taking into account the policies in this Framework.</p>
<b>8</b>	<b>Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?</b>
NPE response	<p>Current NPPG guidance on ‘<i>Housing and economic needs assessment</i>’ states, “<i>Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority...an alternative approach [to the standard methodology] will have to be used. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels.</i>” – paragraph: 014, reference ID: 2a-014-20190220, revision date 20.02.2019.</p> <p>It is therefore already national planning policy guidance that National Park Authorities are: (i) required to undertake an assessment of local housing need; and (ii) to do so using a method determined locally, given the specific circumstances of National Parks. The presence of National Parks should therefore be explicitly highlighted as a factor in a footnote to paragraph 61 which requires a local needs assessment to be undertaken. We also suggest that paragraph 61 is amended to make it clear that the standard method is the advisory starting point for the <u>local authority</u> area, rather than the local <u>planning</u> authority area. National Park Authorities are the latter but not the former, and this clarification in the revised NPPF would be welcomed.</p> <p>As set out elsewhere in our response, the revisions to national planning policy on National Parks and the approach to addressing housing needs provides an opportunity to incorporate the relevant sections set out in the National Parks Circular (2010). Although the Circular is cross-referenced in both the current NPPF and NPPG guidance on ‘Landscape’, the revisions to the NPPF would enable key parts of the Circular to be elevated in profile. Paragraphs 78 and 97 of the Circular state,</p>

	<p><i>“The Government recognises that the [National] Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services...The Government expects the Authorities to maintain a focus on affordable housing.”</i></p> <p>We propose that the key elements of the Circular on addressing housing needs in National Parks are promoted into the revised national planning policy and guidance (including the new National Development Management Policies) for clarity.</p>
<b>9</b>	<p><b>Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?</b></p>
NPE response	<p>National Park and Green Belt boundaries do not overlap and therefore we have no detailed comments on these proposed revisions. However, there are a number of National Parks located adjacent to designated Green Belts (e.g. New Forest, Peak District, South Downs) and it will be important that revised national Green Belt policy does not result in additional development pressures being pushed into nationally protected landscapes (National Parks and AONB), which benefit from a higher statutory status of landscape protection than Green Belts (which are a planning policy tool for managing growth, rather than nationally protected landscapes).</p> <p>We support recognition that building at densities that are significantly out of character with an area can be detrimental to achieving ‘beautiful’ places, and that meeting housing need has to be done within the capacity of a place and not at all costs.</p>
<b>10</b>	<p><b>Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?</b></p>
NPE response	<p>Landscape Character Assessments provide information and guidance on settlement form and built character, pressures and sensitivities, and on integrating development into the landscape to avoid harm. They play a particularly important role in planning new development within nationally protected landscapes (National Parks and AONBs).</p>

<b>11</b>	<b>Do you agree with removing the explicit requirement for plans to be ‘justified’, on the basis of delivering a more proportionate approach to examination?</b>
NPE response	<p>We welcome the proposal to make the evidence base requirements for Local Plans more proportionate and this will assist in meeting the Government’s 30-month target for the production of local plans.</p> <p>The ‘justified’ soundness test currently set out in the NPPF (2021) covers two elements. The first requires draft Plans to be based on an assessment of reasonable alternatives. This is consistent with the Strategic Environmental Assessment (SEA) process, which we acknowledge is due to be replaced with Environmental Outcomes Reports under the Levelling Up &amp; Regeneration Bill. The development, review and testing of alternative options is a core aspect of Plan-making and is often what the various stages of public consultation are based around. From our perspective therefore we do see merit in the existing wording of this part of the ‘justified’ soundness test.</p> <p>The second element of the ‘justified’ test is around ‘proportionate evidence.’ We recognise and support the goal of reducing the evidence burden on planning authorities, which often extends to dozens of evidence base studies, running to hundreds of pages and each with a significant cost for commissioning.</p> <p>The current consultation references meeting housing needs specifically and we would highlight that this is just one aspect of the evidence base studies local planning authorities are required to produce. Other topics – including open space provision, landscape assessment, viability, employment land supply, transport assessments – all have additional evidence requirements. One option would be for the Government to review the NPPG to make clear which aspects of current evidence gathering are considered proportionate and would still be required to meet the ‘deliverable’ test.</p>
<b>12</b>	<b>Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?</b>
NPE response	<p>Yes. The revised tests of soundness should not apply to plans at more advanced stages of preparation. Draft plans that are well-progressed should be encouraged to proceed to submission and independent examination without delay.</p>
<b>13</b>	<b>Do you agree that we should make a change to the Framework on the application of the urban uplift?</b>



NPE response	No comment.
<b>14</b>	<b>What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?</b>
NPE response	No comment.
<b>15</b>	<b>How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?</b>
NPE response	The principles of locating homes in sustainable urban locations where development can reduce the need to travel and make best use of brownfield land are understood. However, several of the 'urban uplift' authorities – including Brighton & Hove, Manchester, Plymouth and Southampton – are located close to designated National Parks. Should an urban uplift authority be unable to fully accommodate their uplifted OAN figure it is important that it does not cascade out to the adjacent National Park areas to meet. This is consistent with the current NPPG 'Natural Environment' section which states, " <i>The National Planning Policy Framework makes clear that the scale and extent of development in these areas [National Parks &amp; AONBs] should be limited...Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.</i> "
<b>16</b>	<b>Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?</b>
NPE response	No comment.
<b>17</b>	<b>Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?</b>



NPE response	No comment.
18	<b>Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?</b>
NPE response	Yes. An approach that ensures development is Plan-led rather than developer-led is welcomed. We welcome the recognition by the Government that slow delivery is generally influenced by factors a planning authority has no control over.
19	<b>Do you consider that the 115% ‘switch-off’ figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?</b>
NPE response	No comment.
20	<b>Do you have views on a robust method for counting deliverable homes permissioned for these purposes?</b>
NPE response	No comment.
21	<b>What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?</b>
NPE response	No comment.
22	<b>Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?</b>
NPE response	Yes. Our experience from supporting the delivery of affordable housing in National Parks is that social rent is the most affordable tenure for local people in housing need compared to other tenures enabled by the NPPF definition of ‘affordable housing’. Evidence from several National Parks highlights that the ‘affordability gap’ means the need for social rent housing outweighs the need for other affordable tenures e.g. affordable sale. We therefore support revisions to national policy to attach more weight to social rented affordable housing and this should include local authority-led social-rent schemes. Given the disparity between incomes

	and house prices in many parts of the country, new build affordable rent or shared ownership housing remains unaffordable for many.
<b>23</b>	<b>Do you agree we should amend existing paragraph 62 of the Framework to support supply of specialist older people's housing?</b>
NPE response	No comment.
<b>24</b>	<b>Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?</b>
NPE response	No comment.
<b>25</b>	<b>How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?</b>
NPE response	<p>Small sites play an important role in housing delivery in National Parks. There is an important interplay between the NPPF's support for the delivery of housing (including affordable) on small sites and the national policy on the thresholds for affordable housing delivery. Currently national planning policy guidance states that for most development sites planning obligations for affordable housing should only be sought for residential developments that are major developments – defined as developments of 10 or more homes, or on sites with an area of 0.5 hectares or more. The imposition of these nationally set thresholds prevents the delivery of affordable housing on small-sites and has the effect of raising land values.</p> <p>In terms of delivery in National Parks, the NPPG guidance on 'Planning Obligations' confirms, "<i>In designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under section 157(1) of the Housing Act 1986, which includes National Parks and Areas of Outstanding Natural Beauty.</i>" - Paragraph 023, reference ID: 23b-023-20190901, revision date 01.09.2019. This is helpful and consistent with planning case law. Several National Park Authorities (e.g. Dartmoor, New Forest) have set lower site size thresholds for the delivery of on-site affordable housing through their adopted Local Plans and the Government could consider widening the principles currently set out in the NPPG to other areas outside designated rural areas (settlements adjacent to nationally protected landscapes can play an important role in meeting affordable housing needs). Policies would still be required to go through independent examination and be supported by evidence, but it is important that national policy recognises the specific circumstances in</p>

	delivering affordable housing for people with a local connection on small sites in protected landscapes.
<b>26</b>	<b>Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?</b>
NPE response	Yes.
<b>27</b>	<b>Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?</b>
NPE response	<p>Our experience is that the existing definition of ‘rural exception sites’ in the annex of the NPPF (2021) – which includes the wording, “...a proportion of market homes may be allowed on the site at the local planning authority’s discretion...” – has resulted in increased ‘hope value’ for rural exception sites. This, in turn, has affected the release of sites for 100% affordable housing, as landowners prefer to keep hold of land in the hope that a development including open market housing will be supported. We therefore suggest that the definition of ‘rural exception sites’ in the annex to the NPPF makes it clear that there is a strong presumption against any open market housing on rural exception sites. Allowing an element of market housing may result in raised land value, which can often be the barrier to delivery. All development on exception sites should reflect rural exception site values.</p> <p>It is important that national policy enables new affordable homes delivered on rural exception sites to be available for those with a strong local connection in perpetuity. This local connection is generally supported by existing communities where new development is located.</p>
<b>28</b>	<b>Is there anything else that you think would help community groups in delivering affordable housing on exception sites?</b>
NPE response	It is important that options for delivery of local need housing on exceptions sites are not limited to community groups. Many community groups partner with Registered Providers to build and manage local need housing and there a number of RPs with a strong track record of rural delivery and which place a high emphasis on working closely with local communities even where the scheme is not community-led e.g. through a CLT.

<b>29</b>	<b>Is there anything else national planning policy could do to support community-led developments?</b>
NPE response	No comment.
<b>30</b>	<b>Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?</b>
NPE response	The rationale for the introduction of this proposed change is understood. However, it would have the effect of making the past behaviour of an applicant a material planning consideration. This goes against a key principle of the planning system that permission is usually granted for the land/property in question (and stays with the land or property), rather than the individual applicant. An alternative would be to require planning permissions to be implemented once permission is granted.
<b>31</b>	<b>Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?</b>
NPE response	No comment.
<b>32</b>	<b>Do you agree that the three build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?</b>
NPE response	No comment.
<b>33</b>	<b>Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?</b>
NPE response	Yes. This amendment builds on the publication of the National Design Code and the National Design Guide. National Park Authorities place a strong emphasis on the design and character of new development, supported by local design guidance and, in some cases, local design awards (e.g. New Forest, South Downs). It is important to recognise that the design of new development is also about place-making and reinforcing local distinctiveness. In a National Park-context the success of new developments often lies in their simplicity, respect for local character and materials and not being overtly decorative/ornate.
<b>34</b>	<b>Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places', to further encourage well-designed and beautiful development?</b>

NPE response	Yes. As set out in our response to Q33, it is important to recognise that the design of new development is also about place-making and reinforcing local distinctiveness, rather than just ‘beauty’. In a National Park context, a beautiful building that does not respect its specific local context within the nationally protected landscape, or the prevailing character of the surroundings, would be inappropriate.
35	<b>Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?</b>
NPE response	Yes. In the context of nationally protected landscapes, the materials used in new developments have a big impact on their overall success.
36	<b>Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?</b>
NPE response	The specific reference to mansard roofs in the proposed revisions to the NPPF is considered too detailed for national policy covering the whole country. Mansard roofs may have a role to play in the densification of some areas, but to include such a specific reference in national policy is unusual. An alternative would be to encourage such measures to be considered locally (along with other solutions that are appropriate to the character of the area) through the production of local design guides and codes.
37	<b>How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?</b>
NPE response	We support attempts to address some of the small-scale impacts of development. The use of artificial grass in new development for example, is at odds with the nature and climate emergency and the delivery of the Government’s 25 Year Environment Plan. Many of these small-scale elements are outside the scope of the current planning system, yet incrementally impact on the local environment and wider Government policy objectives. Small-scale interventions can be significant in landscape and habitat connectivity and therefore can play a vital role in delivering local nature recovery priorities.
38	<b>Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately</b>

	<b>weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?</b>
NPE response	No comment.
<b>39</b>	<b>What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?</b>
NPE response	It is important that future carbon impact assessments capture the embodied carbon in existing buildings. National Park Authorities receive a significant number of planning applications each year to replace habitable dwellings with more energy efficient homes and it is important the consideration of such applications factors in the embodied carbon. On a smaller scale, many elements of traditional buildings such as timber windows which store carbon and which would be repairable are replaced with non-traditional materials such as uPVC, often through national Permitted Development rights. In addition, the assessment should also pick up transport emissions associated with the planned development. It would be beneficial for a system to be established nationally, rather than each local planning authority being required to develop its own process.
<b>40</b>	<b>Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?</b>
NPE response	<p>The NPPF should make specific reference to supporting nature-based solutions to matters including flood risk and the requirement for nutrient neutrality. In terms of the built environment, the wider financial system should incentivise the adaptation, retro-fit and re-use of existing buildings and sustainable, low-carbon products through the VAT system. This could be supported by a corresponding increase for high carbon, non-recyclable materials such as uPVC and PIR insulation.</p> <p>The use of locally sourced sustainable materials will reduce carbon emissions through imports. This needs a strong direction from Government in the national Development Management Policies. Government support for local producers will be essential in tackling embodied emissions.</p>
<b>41</b>	<b>Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?</b>



NPE response	No comment.
<b>42</b>	<b>Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?</b>
NPE response	The rationale for this proposed revision is understood. We would highlight that some existing renewable energy developments in National Parks have a time limit through their planning conditions (e.g. 25 years for ground mounted solar arrays, with removal and restoration required at the end of the prescribes period). This is because the development has a detrimental landscape impact that resulted in a temporary (i.e. 25 years) consent. The revisions in section (c) of this paragraph of the Framework could result in pressure to extend the life of these renewable energy sites in National Parks for which impacts have been identified and conditioned. Planning positively for future re-powering and maintenance could effectively increase the lifetime of a planning permission indefinitely, which may be contrary to other planning objectives.
<b>43</b>	<b>Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?</b>
NPE response	National policy should differentiate between small-scale turbines and large-scale wind farms - currently all levels are caught by the proposed changes. National policy should be clear that support for renewable energy schemes within National Parks is focused on small-scale developments that provide energy for local households or businesses; and schemes should be located and designed to have minimal impacts.
<b>44</b>	<b>Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?</b>
NPE response	<p>In principle yes. The energy efficiency of the existing building stock will always play the biggest role in addressing the impacts of climate change. This is particularly the case in National Parks, where the relatively low level of new development means addressing the impacts of the existing building stock is where the greatest benefits can be delivered. The NPPF wording should apply across the building stock, rather than the focus on non-domestic buildings. As set out in our response to Q39, the NPPF should also be encouraging the re-use of buildings as well as the adaptation of existing buildings to improve their energy performance.</p> <p>Linked to the first statutory National Park purpose (to conserve and enhance the cultural heritage of National Parks), national policy support for the adaptation of existing buildings to improve energy efficiency also needs take account of historic and local character, including buildings</p>



	identified as non-designated heritage assets. Paragraph 161 of the revised NPPF currently only refers to proposals affecting Conservation Areas and Listed Buildings (i.e. designated heritage assets).
<b>45</b>	<b>Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?</b>
NPE response	<p>Welcome the inclusion of the proposed timeline for finalising local plans and other development plans under the current system. As highlighted by the Government's consultation, the 'Plan-led' system is at the heart of the British planning system and it important further national reforms do not stall progress on development plan preparation.</p> <p>The consultation on the NPPF revisions and changes due to be introduced through the Levelling Up &amp; Regeneration Bill highlight the evolving national context for Plan-making that will impact on the ability of planning authorities to bring forward 'sound' Plans in the two-year timeframe set out. Further consultation is expected on proposed changes to other parts of the NPPF and on more detailed policy options for National Development Management Policies once the Levelling Up and Regeneration Bill has passed through its Parliamentary process.</p> <p>Planning authorities seeking to finalise Plans for submission by summer 2025 will be doing so in a context of on-going changes to national policy. It will be important that Plans examined under the current system are assessed proportionately and reasonably. We would also highlight that the capacity/resourcing of both planning authorities and the Planning Inspectorate is a key factor in the Plan-preparation process. In terms of the Planning Inspectorate, Examinations frequently take over a year from submission to the publication of the Inspector's Report and this would represent nearly half of the Government's proposed 30-month Plan production period. It would be more realistic to ask that Plans be submitted for examination by a certain date, rather than require them to be adopted by a specific date.</p>
<b>46</b>	<b>Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?</b>
NPE response	The proposed transitional arrangements for Plans appear reasonable in terms of the timelines set out for submission and examination under the current and proposed future system. In stating this, we would highlight the importance of local authority planning departments being resourced and funded to deliver their statutory functions. The Plan-making process

	<p>remains complex (in terms of consultation, evidence gathering, research) and resource intensive and recent legislation (e.g. the Environment Act 2021) places further responsibilities on planning authorities to deliver against an increasing range of Government agendas. In addition, the requirement to produce a Design Code also places a considerable new burden on local planning authority resources.</p> <p>We also highlight the significant further changes proposed to the national planning system that are due to be implemented with different timescales. Further revisions to the NPPF, the introduction of National Development Management Policies, changes to the national standardised methodology for calculating housing need and the introduction of a 30-month requirement for Local Plan preparation are due to be introduced at different stages over the next two years. This will present significant challenges for Plan-making authorities, both those starting new Local Plans and those assessing whether a review of their adopted Plan is required. This complexity will need to be factored into the future examination process. The Levelling Up &amp; Regeneration Bill proposes two stages of public consultation in the revised Plan-making process and the timescales for Plan-production will need to enable meaningful consultation.</p> <p>The proposed transitional arrangements should also recognise that the current system does not expect Local Plans to be updated every 5 years – instead it requires a review process to check whether an update is required. This provides flexibility and reflects local circumstances - not all areas experience significant change over a 5-year period. Adopted plans that have reached their 5-year review date and been assessed as not needing an update should also be considered ‘up-to-date’ and benefit from protections while a new Plan is prepared under the new system.</p>
<b>47</b>	<b>Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?</b>
NPE response	No comment.
<b>48</b>	<b>Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?</b>
NPE response	<p>We believe that Supplementary Planning Documents should be retained as an important part of the revised planning system.</p> <p>Supplementary Planning Documents (SPDs) are an important planning tool in supporting the development plan. They are frequently used by</p>

	<p>National Park Authorities (and other planning authorities) to provide local design guidance (including Village Design Statements prepared with the input of local communities), site-specific development briefs and adding local detail on how national requirements (e.g. compliance with the Habitats Regulations) can be addressed. They can be prepared relatively quickly, focus on specific matters and provide the level of detail that is often not appropriate for the development plan. Supplementary Planning Documents undergo public consultation and must be consistent with the overarching development plan for the area. A Supplementary Plan with the same weight as a Local Plan (and presumably a similar preparation process) seems to unnecessarily double-up on policy documents, rather than add a useful complementary approach to policy and plan-making</p> <p>If they are to be ultimately lost, we agree that SPDs should continue to be afforded weight as material planning considerations until a revised Local Plan is adopted.</p>
<b>49</b>	<b>Do you agree with the suggested scope and principles for guiding National Development Management Policies?</b>
NPE response	<p>Taking the current NPPF as a starting point is a reasonable approach. However we have concerns that National Development Management Policies will not go through the same scrutiny and public involvement as development plans, which are required to go through several rounds of consultation and independent public examination. Given the new statutory weight of national policies, the Government should carry out more than one round of consultation, with the second round setting out comments made on the first, and the Government's response. It is also vital that National Development Management Policies are set out at a high level, allowing scope for additional policy to reflect local circumstances.</p> <p>We acknowledge a separate consultation will take place on the proposed National Development Management Policies. Based on the information currently available it is proposed that if there is a conflict with the Local Plan then national policies will take precedence. This is a fundamental change to the current (local) plan-led system and reinforces the need for full consultation on the National Development Management Policies. In addition, a robust process must be established for revisions to existing or new National Development Management Policies. To ensure this is the case and to provide certainty, this process should be set out in law.</p>
<b>50</b>	<b>What other principles, if any, do you believe should inform the scope of National Development Management Policies?</b>
NPE response	No comment.

51	<b>Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?</b>
NPE response	No comment
52	<b>Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?</b>
NPE response	<p>There is justification for elevating the existing NPPF policy wording on National Parks into the National Development Management Policies, to be supplemented by the more detailed local policy wording prepared by the respective National Park Authorities. The current wording in paragraphs 178 – 179 of the NPPF (2021) covers the importance of National Park purposes in planning decisions, the need for development to be restricted in scale and extent in these areas; reference to the importance of the setting of National Parks; and the “Major Development Test”.</p> <p>In terms of other areas of policy, of particular relevance to National Parks is advice in the Government’s extant National Parks Circular (2010), which is cross-referenced in both the existing NPPF (2021) and the accompanying NPPG guidance. The Circular covers the approach to addressing housing needs in National Parks and confirms that National Parks “...are not suitable locations for unrestricted housing...”; therefore the Government, “...does not therefore provide general housing targets for them...” (paragraph 78); and “...the expectation is that new housing will be focussed on meeting affordable housing requirements, supporting local employment opportunities and key services.” These areas of national policy set out in the Circular should be included in the new National Development Management Policies. In doing so, it is vital that the revised system retains the process whereby local planning policy-making can address locally specific issues and priorities.</p>
53	<b>What, if any, planning policies do you think could be included in a new framework to help achieve the twelve levelling up missions in the Levelling Up White Paper?</b>
NPE response	No comment.
54	<b>How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?</b>
NPE response	No comment.

<b>55</b>	<b>Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?</b>
NPE response	No comment.
<b>56</b>	<b>Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?</b>
NPE response	No comment.
<b>57</b>	<b>Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?</b>
NPE response	No comment.
<b>58</b>	<b>We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.</b>
NPE response	No comment.