

Consultation response form

This is the response form for the consultation on the draft revised National Planning Policy Framework. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (*)

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Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?*

Organisational response

If you are responding on behalf of an organisation, please select the option which best describes your organisation. *

Please select an item from this drop down menu

If you selected other, please state the type of organisation

Rural Consultants Members Consortium

Please provide the name of the organisation (if applicable)

The British Institute of Agricultural Consultants (BIAC)

Chapter 1: Introduction

Question 1

Do you have any comments on the text of Chapter 1?

[Click here to enter text.](#)

Chapter 2: Achieving sustainable development

Question 2

Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

Yes

Please enter your comments here

Paragraph 11 footnote 7

We are concerned about the changes to the presumption in respect of decision taking.

Though planning authorities are likely to use paragraph 11 and footnote 7 as an excuse to refuse all planning applications for rural economic development in designated and protected areas, e.g. SSSIs, Green Belt and AONBs or National Parks. It is accepted that ancient woodland and SSSIs and areas at risk of flooding require protection from development, that same protection does not necessarily always apply to National Parks, AONBs, etc. where there may be a requirement to deliver urgently same scale rural housing developments on rural exception sites and beneficial economic development to support economic growth and developer jobs.

Beneficial economic (including housing) developments are particularly difficult to achieve in these areas today. The designated areas are not just about farming and tourism, there are multi-diverse businesses operating in these areas but they must be able to invest in the future of these businesses in terms of growth and productivity. In a number of cases the rural communities in 'designated areas' are largely 'unsustainable' because there has been practically no new development allowed in these villages for many years. These local communities have the same needs for jobs, homes and services, as do their urban counterparts.

Question 3

Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

No

Please enter your comments here

No – we do not agree – the core planning principles that were previously in a specific list has now been diluted and is lost in the text in Section 5 within ‘Thriving Rural Communities’ – but this is also about delivering new rural economic development – ‘a living and working countryside’ so the phrase ‘Thriving Rural Communities’ should also be included in Section 6 ‘Supporting a Prosperous Rural Economy’.

Question 4

Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

[Click here to enter text.](#)

Chapter 3: Plan-making

Question 5

Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 6

Do you have any other comments on the text of chapter 3?

[Click here to enter text.](#)

Chapter 4: Decision-making

Question 7

The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 8

Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

Yes

Please enter your comments here:

[Click here to enter text.](#)

Question 9

What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

Please enter your comments below

[Click here to enter text.](#)

Question 10

Do you have any comments on the text of Chapter 4?

We are very concerned about the lose of two very useful paragraphs that are contained in the March 2012 NPPF namely:

186. Local planning authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. The relationship between decision-taking and plan-making should be seamless, translating plans into high quality development on the ground.

187. Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.

The revised NPPF has replaced these two paragraphs with Paragraph 39 but the wording within is extremely diluted, we would strong support the reinstatement of Paragraphs 186 and 187 in the revised NPPF.

Paragraph 45 – Information requirements, this paragraph should be reinforced with the requirement that planning authorities should set out the reasons why they require a specific

report and why in their considered opinion that report is relevant, necessary and material to the application in question.

Chapter 5: Delivering a wide choice of high quality homes

Question 11

What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?

Please enter your comments here

It has been some 10 years since the Matthew Taylor Review 'Living Working Countryside' identifying where development can only occur in places already considered to be 'sustainable'. Many rural settlements which have lost key services, public transport, shops, schools, etc. have been caught in planning terminology 'sustainability trap' and are restricted from future growth. This for many years has played a major role in inflating house prices and eroding the social cohesion of many small rural communities by restricting new development of all types and tenures. Without fundamental change in this approach many small villages will become nothing more than commuter residential hamlets!

In many Local Plans settlements were categorised into 'limited and restricted development in the villages' this was reflected in the old planning policy statements PPS7 and PPS3 which required LPAs to locate most development for rural housing, jobs, shopping in local 'service or limited development' villages. Housing allocations in general in village locations are limited to small scale in-fill development or the re-development by way of conversion of agricultural buildings or rural exception sites.

Housing needs assessments in the village communities is essential to be prepared by LPAs or indeed the Parish Council.

Question 12

Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 13

Do you agree with the new policy on exception sites for entry-level homes?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 14

Do you have any other comments on the text of Chapter 5?

Paragraph 80

It is essential that new homes (of all types and tenure) in small villages are granted planning permission alongside assistance in reintroducing lost services to these locations.

By the current Local Plan proposals to prohibit much needed small scale developments (up to ten houses) in smaller villages is what has lead to the loss of services and it is unlikely that these will ever be reintroduced. The concept of sustainable development must apply also to the smallest village/hamlet.

Paragraph 81a)

81a) has amended the essential rural workers' policy. We consider that this subsection could still benefit from some more clarity. It would be helpful to define what "majority control" of a farm business means. It would also be helpful to clarify where the NPPF stands on matters such as financial viability and new enterprises.

We consider that 81a) could usefully be expanded slightly, and use a footnote, and suggest the following.

"a) there is an existing essential need for a rural worker on an established⁽¹⁾ and financially viable rural business, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside". It may be appropriate to consider a 'third' category of rural worker housing: the permanent consent (or semi-permanent consent) for an otherwise temporary structure. Perhaps a five-ten year period of consent (rather than the conventional succession of three year temporary consents) would be better. A proven need would have to be identified by the applicant but it could be conditioned in such a way as to not leading to a permanent residential consent or permanent dwelling.

Many rural workers are seasonal, though there may be a need for presence on sight for someone to oversee matters, whether that be irrigation, animals or cool chain processes, apart from a security based concerns of farms/farmers.

Some local planning authorities have a cautionary approach to applications for 'temporary' rural workers accommodation to support leisure and education on farms. It would be a great benefit to include within the NPPF text a category of use such as Leisure and Education. Particularly the greater emphasis and need for education of children in the countryside and the need for that supervisory and security residence on site.

Footnote: ⁽¹⁾ for new enterprises a temporary consent may be appropriate until the enterprise is established and viable.

Paragraph 81d)

We welcome this addition.

Chapter 6: Building a strong, competitive economy

Question 15

Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

Yes

Please enter your comments here

We make the following comments.

Paragraph 84 (c) we consider is not sufficiently robust and should be reworded to state 'sustainable rural tourism and leisure developments that benefit businesses in rural areas... which respect the character of the countryside'.

Paragraph 85 recognises that some business and community development may have to be located outside existing settlements and as such locations that lack public transport. However, the caveat in this paragraph is not helpful 'does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable'. In many cases the use of the private motor car or haulage vehicles in rural areas is a necessity as there are no other options and there is severe limitations in relation to improving the ability to cycle or walk or to use public transport.

We welcome the change in text to "enable" at paragraph 84 and the inclusion of the rural economy section at paragraph 85.

Question 16

Do you have any other comments on the text of chapter 6?

[Click here to enter text.](#)

Chapter 7: Ensuring the vitality of town centres

Question 17

Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses?

Not sure

Please enter your comments here

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Question 18

Do you have any other comments on the text of Chapter 7?

[Click here to enter text.](#)

Chapter 8: Promoting healthy and safe communities

Question 19

Do you have any comments on the new policies in Chapter 8 that have not already been consulted on?

[Click here to enter text.](#)

Question 20

Do you have any other comments on the text of Chapter 8?

[Click here to enter text.](#)

Chapter 9: Promoting sustainable transport

Question 21

Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 22

Do you agree with the policy change that recognises the importance of general aviation facilities?

Not sure

Please enter your comments here

[Click here to enter text.](#)

Question 23

Do you have any other comments on the text of Chapter 9?

[Click here to enter text.](#)

Chapter 10: Supporting high quality communications

Question 24

Do you have any comments on the text of Chapter 10?

[Click here to enter text.](#)

Chapter 11: Making effective use of land

Question 25

Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 26

Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 27

Do you have any other comments on the text of Chapter 11?

[Click here to enter text.](#)

Chapter 12 : Achieving well-designed places

Question 28

Do you have any comments on the changes of policy in Chapter 12 that have not already been consulted on?

[Click here to enter text.](#)

Question 29

Do you have any other comments on the text of Chapter 12?

[Click here to enter text.](#)

Chapter 13: Protecting the Green Belt

Question 30

Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt, and to provide for the other forms of development that are 'not inappropriate' in the Green Belt?

Yes

Please enter your comments here

We fully agree with the inclusion of **proposed paragraph 145e)** to allow changes of use of land in **Green Belts where openness is preserved**. BIAC has long identified the unintended exclusion of **changes of use land, for example for the keeping of horses, from the appropriate development category**. Therefore, we welcome the clarity this subparagraph will bring.

We also support the inclusion of limited affordable housing for local community needs in the **exceptions at paragraph 144 as this will allow much needed housing in settlements with suitable sites which are otherwise constrained by the Green Belt**.

Question 31

Do you have any other comments on the text of Chapter 13?

Paragraph 135 – the following comments:

The desire to protect Green Belt (which is a planning policy and not an environmental designation) is at odds with the economic development needs of the countryside surrounding the urban areas the consequences of the governments decision broadly to protect the Green Belt inevitably means that housing land must be secured for elsewhere, and indeed this may be on to areas of land that have much more biodiversity rich in attractive countryside, and as such leads to a greater pressure on transport infrastructure.

Green Belt land is predominantly rural and much of the land is in agricultural use. Paragraphs 84 and 85 of the revised NPPF supports the delivery of a prosperous rural economy and offers positive encouragement for farm based diversification in relation to reuse of farm buildings and the need for new buildings. There is definite difference in planning permission approvals for diversification schemes in Green

Belt areas as compared to other rural locations. Many of the refusals issued by LPAs for farm based diversification proposals site the need to maintain the open aspect of the Green Belt. In many cases the reasons for refusal being given that the proposals are 'inappropriate development' in a Green Belt area. These decisions are contradictory to the encouragement of on farm diversification in the former NPPF paragraph 28 and proposed paragraphs 84 and 85. The purpose of Green Belt designation should not be to undermine the completitiveness of farming and diversification.

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

Question 32

Do you have any comments on the text of Chapter 14?

[Click here to enter text.](#)

Question 33

Does paragraph 149b need any further amendment to reflect the ambitions in the Clean Growth Strategy to reduce emissions from building?

Not sure

[Click here to enter text.](#)

Chapter 15: Conserving and enhancing the natural environment

Question 34

Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 35

Do you have any other comments on the text of Chapter 15?

Chapter 16: Conserving and enhancing the historic environment

Question 36

Do you have any comments on the text of Chapter 16?

[Click here to enter text.](#)

Chapter 17: Facilitating the sustainable use of minerals

Question 37

Do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text in this chapter?

[Click here to enter text.](#)

Question 38

Do you think that planning policy in minerals would be better contained in a separate document?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 39

Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

No

Please enter your comments here

[Click here to enter text.](#)

Transitional arrangements and consequential changes

Question 40

Do you agree with the proposed transitional arrangements?

Yes

Please enter your comments here

[Click here to enter text.](#)

Question 41

Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

Not sure

Please enter your comments here

[Click here to enter text.](#)

Question 42

Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

Not sure

Please enter your comments here

[Click here to enter text.](#)

Glossary

Question 43

Do you have any comments on the glossary?

[Click here to enter text.](#)