

# North Yorkshire Council

## Executive Member

5 March 2026

### Council response to the national consultation on new draft National Planning Policy Framework

#### Report of the Corporate Director for Community Development.

#### 1.0 PURPOSE OF REPORT

- 1.1 The report seeks agreement for submission of officer comments to the Ministry of Housing, Communities and Local Government (MHCLG) on the national consultation on a new draft National Planning Policy Framework (NPPF).

#### 2.0 SUMMARY

- 2.1 In December 2025 the Government published a national consultation seeking views on a revised National Planning Policy Framework (NPPF). The consultation asked for responses to a set of questions about the draft NPPF. This response draws together a single council response comprising input from officers across all relevant council service. With approval these responses will be submitted to the consultation. See Appendix A.

#### 3.0 BACKGROUND

- 3.1 The new draft NPPF represents a continuation of the government's reform of the planning system. This was started by the previous government with the Levelling Up and Regeneration Act (LURA) and continued by this government through a revised NPPF in 2024 and the Planning and Infrastructure Act, which received royal ascent last year.
- 3.2 Although the NPPF was revised in 2024, it was clear at the time that further, more substantive, revisions would be forthcoming. In November 2025, Government published a collection of new guidance and details concerning planning reform, including details about forthcoming plan making regulations and confirming that a new draft NPPF would be published before the end of the year for consultation.

#### 4.0 DRAFT NPPF

- 4.1 The new draft NPPF is the biggest change to this key planning policy document since it was first published in 2012. The changes are significant both in terms of the policy content but also the way that the document is structured.
- 4.2 The structural changes include:
- All policies are numbered with much clearer listing of requirements within each policy.
  - Each section starts with an overarching pre-amble, but this is not to be used to develop policies or for decision-making.
  - A clear division between policies relevant to plan making and those relevant to decision taking. The two are not to be inter-changeable.
  - Reordering of topics to reflect the importance of those dealing with climate change and sustainable development.

- 4.3 Overall the draft NPPF is intended to increase certainty for development, particularly residential development, by moving to a much more rules-based approach that leads to more predictable outcomes. The changes also set out clearer expectations for local plans, which are expected to be more outcome focused and more concise, with more emphasis placed on the policies map.
- 4.4 The consultation asks over 200 questions, with many seeking additional clarification of the response, or some sub-questions. It is not proposed to detail all the responses in the report. The principle of many of the changes can be supported. However, when considered in detail, many policies lack critical implementation details or clarity and raise concerns about how they would be implemented for an area like North Yorkshire. This is given its significant scale and complexity in terms of the range and breadth of issues to consider, coupled with wide-ranging viability considerations. The most significant of these concerns are set out below, and have been broken into different areas.
- 4.5 As this is the most significant change to the NPPF since it was first published there are concerns about the implementation of new and revised policies. The national planning practice guidance will also need to be updated, something that has lagged behind for previous NPPF revisions. The interpretation of policies will be tested through appeals and examinations, and ultimately case law, so it may be some time before the significance of some changes is fully understood/experienced.

## **Plan Making**

### ***Spatial Development Strategies***

- 4.6 Spatial Development Strategies (SDS) have been introduced by the LURA, as a new strategic tier of plan making, to be prepared by mayoral combined authorities. The draft NPPF sets out a range of expectations for the preparation and content of SDS including details about the relationship between SDS and local plans.
- 4.7 Broadly the provisions are considered to set reasonable expectations for the production of SDS that would support the preparation of local plans in shorter time scales once a SDS is in place. However, while the SDS is being prepared, the North Yorkshire Local Plan will have to explore and take on several strategic planning components that would also be contained or reflected in the SDS. There are several points where we consider clarification is needed to ensure that SDS can be prepared on a consistent basis and provide a reliable basis over time to enable timely local plan preparation.
- 4.8 Close working with the York and North Yorkshire Combined Authority (YNYCA) will be essential. Officers are already working proactively with City of York Council, both National Parks and the CA to joint-commission evidence to inform plan preparation. The timing of SDS preparation will be key to understanding what elements may need to be part of the local plan.
- 4.9 Particular elements of the requirements set out for SDS that raise concerns are those to do with the timescale that the strategies will cover and the requirements for review. It is proposed that SDS should cover a minimum of 20-year period. We consider this to be longer than necessary. This is given the emphasis with local plans of a much shorter preparation period and review within 5 years, a time horizon of 15 years minimum would be sufficient for SDS. Conversely, it is proposed that the local plan development requirements set out in SDS should be reviewed at least every 5 years, creating constant flux on strategic planning matters. We think there is value in having the consistency of housing requirements set out in the SDS with a longer time horizon, so local plans can complete the review cycle without having development requirements change part way through. As such, we do not

support any requirement for review or amendment/update on less than a five-year frequency.

- 4.10 The requirements for SDS also set out details for waste and minerals. We think that more clarity is required to address circumstances where there is a strategic waste and minerals plan, as there is for North Yorkshire, the City of York and the North York Moors National Park.
- 4.11 The consultation proposes to set out housing requirements for Gypsies and Travellers to be required in the SDS. We have concerns about the approach to put what are locally-specific housing need requirements in a document which is high-level in its development requirements, and by nature is not expected to be site-specific. It is considered that such needs should be considered and addressed within the local plan. Also, due to the scale of North Yorkshire this will naturally allow the opportunity to consider this area of housing need across a suitably broad geographical area.

### **Local Plans**

- 4.12 The consultation proposes bringing into the NPPF policies relating to gypsies and travellers and travelling showpeople which are currently contained in a separate national planning policy statement. In principle, we support this approach. However, there are several points where the proposed approach (and terminology used) would adversely impact on the recognition of gypsies and travellers and their differing circumstances. Of particular note, is the omission of gypsy and travellers sites from the types of development that are considered acceptable outside the built form of settlements.
- 4.13 The proposed changes to simplify principles for the location of development should make it easier to bring forward small sites. With clear support for the principle of development in different locations/circumstances, with strengthened support for mixed tenure development. There is also clear support for affordable housing to meet local needs. However, it is proposed to change requirements for local plans that would require them to allocate small and medium sites to meet 20% of the plan's housing requirement (doubling current requirements). Whilst a mix of site sizes is important for maintaining a healthy land supply, supporting smaller housebuilders and ensuring diversity within the housing market, in practical terms, setting a target of 20% could require the North Yorkshire Local Plan to include more than 200 site allocations to meet this requirement alone. This is likely to have knock-on adverse implications for establishing cumulative infrastructure considerations. Medium sites may also be able to forgo affordable housing units within the development, instead opting for financial contributions. While this is not part of the draft NPPF, the consultation seeks views on such a potential change. We are concerned about this particularly as it would mean that the council would have to find and secure more sites for affordable housing.
- 4.14 Several changes proposed in the draft NPPF continue the government's reform of the planning system to take a more 'digital first' approach. The most significant will be in relation to content that is expected to be available on the council's website as plain text content rather than as pdf documents as standard. There is also an expectation that digital maps will be used to present data and show the extent of all local plan policies both during preparation and after adoption, with such maps being a principal way that people would engage with the local plan. Such moves are supported, and we believe the council is well placed to meet requirements. However, depending on the technical requirements there may still be some challenges. Particularly around inclusion and the fact that a significant number of residents do not have access to the internet.

- 4.15 It is proposed to limit the ability of local planning authorities to set local standards for housing development. This would prevent councils from setting energy efficiency standards that go beyond building regulations, where viable and deliverable, but also from setting infrastructure and other environmental standards to mitigate impacts of development on our natural environment. This would potentially limit our ability to respond to climate change and meet our stated aims for net zero and being carbon negative, as well as addressing infrastructure provision comprehensively. We have therefore responded to relevant questions to say that we do not agree with this proposed change.
- 4.16 For accessible building standards such as M4(2) and M4(3), the draft NPPF proposes a minimum of 40% of new homes comply with these standards. While this is supported, we think that it doesn't go far enough. This is a key area for the Council in terms of meet the needs of our older people and provide greater choice for those with disabilities, and the North Yorkshire Local Plan would need to require a much higher percentage to meet those needs.
- 4.17 We have concerns about policies relating to Green Belt land, for the review of boundaries of existing Green Belt, particularly for land close to train stations (see decision-making below) and for establishing new Green Belt.
- 4.18 The government is considering whether to remove the sequential test from the consideration of retail development. We have responded that we support the retention of the sequential test for significant retail schemes, to ensure that they do not undermine the viability and viability of town centres. Whilst it could be simplified to make it more straightforward to implement, we consider it should be retained in principle.

### ***Minerals and Waste Plans***

- 4.19 The draft NPPF sets a prohibition on coal extraction, which is supported. However, it also removes the long-standing description of minerals as "essential" and downgrades the strategic importance of mineral extraction overall.

### ***Neighbourhood Plans***

- 4.20 There are several changes relating to neighbourhood plans that in-combination we think will make these plans more onerous to prepare and will increase expectations of the support the council will provide:
- The draft makes clear that neighbourhood plans should not propose less development than what is already set out in the wider development plan. Although this has been an expectation of neighbourhood plans since they were introduced, it is proposed that this would be a firm unambiguous requirement.
  - It is proposed that local plans will have to set housing development requirements for neighbourhood areas and that these plans must contain allocations to meet the requirement. Although this has been part of the NPPF since 2019, the new policy is much firmer and it is proposed that local plans should avoid setting requirements at zero.
  - It is proposed that for neighbourhood plans to benefit from being considered up to date in relation to housing land supply and the 'tilted balance' they must contain housing allocations.

Together with the recent removal of national grant funding to support neighbourhood plan groups to prepare their plans, this represents a significantly more challenging environment for neighbourhood plans and is likely to add significantly to the support that groups will look for from the council.

## Decision-making

- 4.21 The draft NPPF includes new national decision-making policies. These policies are intended to cover many common circumstances where a consistent approach across the country is desirable from both a consistency perspective and for speeding up decision making. Although the LURA enables statutory national development management policies, government has decided that these decision-making policies will be part of the NPPF and would therefore be non-statutory. However, they propose that local plans will not repeat or modify these national policies, and crucially that significantly less weight is to be attributed to development plan policies that were prepared before the new version of the NPPF is published. We do not currently know when publication will be but understand that government aim to complete it before the end of the parliamentary session in July. As such, the decision-making policies, if implemented as proposed, would become the main basis for decision-making in North Yorkshire immediately after publication of the new NPPF due to the age of our adopted local plans. The Local Plans would still be referenced, as required in law, but their weight would be diminished.
- 4.22 Overall, the approach taken in the draft NPPF to climate change mitigation and adaptation is more coherent and comprehensive. However, the draft would limit the ability to tackle climate change through decision-making. For example, it provides no avenue for refusing development on the grounds of creating unacceptably high levels of carbon emissions. Also, we have concerns about the policy relating to wildfire risk. It is good that this is raised given the recent fires in the North York Moors, but we think there is a lack of detail about when wildfire risks should be considered and may introduce onerous requirements where not needed. Together with the restriction on local plan policies for energy efficiency identified above we think that more could be done to address climate change.
- 4.23 It is proposed that land around train stations should be considered in principle suitable for residential or residential-led development. The details of how this is implemented raise concerns in relation to review of Green Belt land near stations in local plans, but also for the decision-making process that could see such land having to be approved. There are questions about several implementation details, including what is meant by 'within reasonable walking distance', how 'well-connected' stations are defined and the minimum densities for development that are set out.
- 4.24 The draft NPPF has a policy which provides high-level guidance on good design for residential extensions. We have concerns that this is not sufficiently detailed. It lacks details covering surrounding buildings and the street scene, and only covers the amenity of existing or future residents of the building itself not of neighbours. Whilst this may seem lacking in strategic significance, large numbers of planning applications are concerning extensions to dwellings, and impacts if not assessed fully can be severe for the impacted residents.

## Enforcement

- 4.25 It is proposed that, if it is concluded that unauthorised development was intentional, that fact should be given substantial weight in considering whether to grant planning permission in relation to retrospective applications and enforcement appeals where planning permission is being sought. Under current arrangements, we are required to firstly determine if a proposal is both expedient and in the public interest to take enforcement action on. When an application is submitted, the local planning authority only consider the planning merits of the proposal when the application is determined. This proposed change represents a fundamental shift in the treatment of unauthorised development. It is noted that in establishing whether a development is lawful, if it can be evidenced that there has been deliberate actions to deceive the local planning authority, that can result in

developments being judged to not be lawful. But this is not a matter for planning policy, and perhaps the two aspects have been inadvertently conflated.

## **5.0 CONSULTATION UNDERTAKEN AND RESPONSES**

5.1 Officers from across the council have been involved with writing responses. This has ensured that a comprehensive set of responses has been compiled, fully considering the effect of proposed changes for the council. There has been a high degree of consensus on how to respond.

## **6.0 CONTRIBUTION TO COUNCIL PRIORITIES**

6.1 There is no impact on achieving council priorities relating to responding to the consultation. The North Yorkshire Local Plan will be a key component in achieving the land use related aspects of council priorities. There are a number of changes proposed for the preparation of local plans and their content if this version of the NPPF is published, and we can reflect that during the course of the plan's preparation. But in relation to decision-making the impact will be significant and immediate.

## **7.0 ALTERNATIVE OPTIONS CONSIDERED**

7.1 The alternative option would be not to submit a response. However, as there are several matters that it is considered essential for the council to respond on this alternative was discounted. Also, by providing one, consistent and unambiguous response we are providing a clear position to MHCLG.

## **8.0 IMPACT ON OTHER SERVICES/ORGANISATIONS**

8.1 There are no implications for other services or organisations in relation to responding to the consultation. However, the expectations and requirements set for SDS, identified above will be important for the YNYCA. The Council's Public Health Team have been in discussions with the Policy and Place Team and this has shaped the response in the appendix. Public Health will be sending out their response separately.

## **9.0 FINANCIAL IMPLICATIONS**

9.1 No financial implications have been identified arising from responding to the consultation.

## **10.0 LEGAL IMPLICATIONS**

10.1 There are no identified implications relating to legal matters from responding to the consultation. Implications regarding the operation of the NPPF will be subject of consideration as needed.

## **11.0 EQUALITIES IMPLICATIONS**

11.1 There are no equalities implications from responding to the consultation. See Appendix B.

11.2 The consultation includes specific questions relating equalities in the NPPF. We have identified areas where we think that there may be adverse implications for equalities in our response. Most notably around the terminology of 'travellers', which we consider to be inappropriate to use the term travellers to cover both Gypsy and Travellers and Travelling Showpeople as they are very distinct groups with different cultures and housing needs. There is inconsistency throughout the NPPF with the terminology used. All references to travellers should be removed and replaced with Gypsies and Travellers and/or Travelling Showpeople. There are also greater barriers placed within the policy framework for Gypsies

and Travellers to meet their housing needs, which are more stringent than those for market and or affordable housing. We have also identified some potential implications for service families and potential implications for rural housing opportunities with policy S2.

11.3 Whilst relating to plan-making processes, we have identified the importance of engagement with groups who identify with protected characteristics, and this should be factored into plan-making schedules.

11.4 But we have also identified that there may be positive opportunities to apply additional standards around housing HC1, HC2, HC3, HC4, HC7, HC8 which could be bringing in new standards which go above existing local plans and bring benefits to those who would identify with protected characteristics (older people, those with disabilities, those on low incomes and in rural areas), although it is also dependant on the location of the proposal.

## **12.0 CLIMATE CHANGE IMPLICATIONS**

12.1 No implications relating to climate change have been identified arising from responding to this consultation. There are a number of concerns raised about how the draft NPPF will impact on local plan preparation, and the extent to which we would be able to address climate change through the planning system. See Appendix C.

## **13.0 PERFORMANCE IMPLICATIONS**

13.1 There are no identified implications relating to performance matters from responding to the consultation.

## **14.0 POLICY IMPLICATIONS**

14.1 There are no identified implications relating to policy matters from responding to the consultation.

## **15.0 RISK MANAGEMENT IMPLICATIONS**

15.1 No risk management implications have been identified arising from responding to the consultation. The implications of implementation of the NPPF will be considered through the local plan process and project management.

## **16.0 HUMAN RESOURCES IMPLICATIONS**

16.1 There are no implications relating to human resources from responding to the consultation.

## **17.0 ICT IMPLICATIONS**

17.1 There are no implications relating to ICT from responding to the consultation.

## **18.0 COMMUNITY SAFETY IMPLICATIONS**

18.1 No implications have been identified relating to community safety from responding to the consultation.

## **19.0 CONCLUSIONS**

- 19.1 The new draft NPPF represents the most significant change to this key planning policy document since it was first published in 2012. There is also much to support in the draft NPPF. However, in several areas we think that further clarification is necessary, while in some cases the approach proposed is not supported. Where this is the case, responses are clear about the concerns and potential impact for North Yorkshire.
- 19.2 Perhaps of most significance at this time are the decision-making policies, which, if implemented as proposed, would become the main basis for decision-making in North Yorkshire immediately after publication of the new NPPF due to the age of adopted local plans.

## **20.0 REASONS FOR RECOMMENDATIONS**

- 20.1 To provide MHCLG with the Council's response to the consultation. This response is important: the proposed NPPF, as a framework for planning policy making and decision taking, is expected to have much greater weight in planning decisions.

## **21.0 RECOMMENDATION**

- 21.1 That the response set out at Appendix A is agreed for submission to MHCLG.

## **APPENDICES:**

Appendix A – Consultation Questions and our responses  
Appendix B – Climate Change Impact Assessment Screening Form  
Appendix C – Equality Impact Assessment Screening Form

## **BACKGROUND DOCUMENTS:**

[National Planning Policy Framework: draft text for consultation](#)

[National Planning Policy Framework: proposed reforms and other changes to the planning system](#)

[Questions on proposed reforms to the NPPF](#)

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17 February 2026

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Presenter of Report – Rachael Balmer, Planning Policy and Place Manager

Note: Members are invited to contact the author in advance of the meeting with any detailed queries or questions.

## Appendix A - Consultation Questions and our responses

Question	Response
1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?	We feel that we need clarity on the hierarchy, this needs to be introduced in a clear way. We need practical guidance on dealing with inconsistencies, what are they between local and national policy?
2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
2a) Please provide your reasons, particularly if you disagree.	-
3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
3a) Please provide your reasons, particularly if you disagree.	-
4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework? Strongly agree, partly agree, neither agree nor disagree, partly	Strongly agree

Question	Response
disagree, strongly disagree.	
4a) Please provide your reasons, particularly if you disagree.	We support the inclusion of policies for gypsy and travellers being included in the NPPF. However, we have some concerns relating to specific policies that are identified in other responses. Including a policy on Traveller sites would ensure that the needs of this population group are appropriately considered in the same manner as wider housing needs.
5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree	Strongly agree
5a) Please provide your reasons, particularly if you disagree	From Public Health: Although health is mentioned in Paragraph 16 it would have more weight as an entirely separate objective on health which includes reducing inequality goals. Alternatively, could expand 16 b by adding a desire to reduce inequalities but this is less explicit than an entirely new paragraph. It should also be noted that a healthy workforce significantly contributes to a strong economy.
6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
6a) Please provide your reasons, particularly if you disagree.	Consideration should be given to whether there is a need for consistency in the minimum plan periods proposed for SDSs (20yrs) and LPs (15 yrs). It is our view that a 10-year plan period is an appropriate minimum for local plans (see response to question 10). This would be inconsistent with a min of 20 yrs for SDS, in terms of reviewing and updating of SDS and potential conformity issues between LP and SDS and suggest that a SDS plan period of a minimum of 15 years is more appropriate. Further detail is required on the relationship between SDS and LPs in terms of preparation etc. We would question whether SDS should be expected to set out the type, extent and broad location of waste infrastructure, as per PM1, 2f, if there is a joint waste and minerals local plan at a strategic level. Should the expectation for waste infrastructure be the same as for the provision of minerals i.e. 'where considered appropriate'? Clarity is required on whether, where there is a joint Minerals and Waste Local plan dealing with waste at a Strategic level, there is still a requirement for waste infrastructure to be included in all Spatial Development Strategies. Minerals in this point has been separated out to state where appropriate, consideration is needed on whether it should be the same for waste where there is a joint plan. From Public Health: The strategic nature of the SDS must recognise the different components that create sustainable development. PM1 should include a requirement for SDS to include a Health in all policy approach to ensure that truly sustainable development is planned, secured and delivered. The criteria of part 2 of PM1 should include identifying the required health infrastructure that would be required to support the levels of growth being planned, including hospitals which are often delivering health care across administrative boundaries.
7) Do you agree that alterations should be made to spatial development strategies at least every 5	Partly disagree

Question	Response
<p>years to reflect any changes to housing requirements for the local planning authorities in the strategy area? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	
<p>7a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?</p>	<p>We agree that housing requirements should be kept under review. However, we think that it should not be a requirement to amend SDS at least every 5 years, as set out in PM1, 3, if there is only limited change. We think that PM1, 2, i, iii provides adequate basis for triggering a review. We think there is value in having the consistency of housing requirements in the SDS over several years so would not support any requirement for review or amendment/update on less than a five-year frequency.</p>
<p>8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Strongly agree</p>
<p>8a) Please provide your reasons, particularly if you disagree.</p>	<p>If housing requirements have been reviewed on a five yearly basis, but it is considered unnecessary to change the requirement then this should be reflected in the 5-year housing land requirement calculations.</p>

Question	Response
9) Do you agree with the role, purpose and content of local plans set out in policy PM2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
9a) Please provide your reasons, particularly if you disagree.	From Public Health: PM2 includes reference to only two aspects of sustainable development; an economic objective, and; an environmental objective. To truly deliver sustainable growth and development PM2 should include reference the third pillar of sustainable development and include a social objective of sustainable development by way of including the text "support the health and wellbeing of the growing population".
10)Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No	No
10a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.	We think that with the changes to the requirements for the length of time taken for plan preparation and the commencement of the next plan a 10 year period would be appropriate as a minimum.
11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree
11a) Please provide your reasons, particularly if you disagree.	As national DM policies are non-statutory, we do not agree with PM6, 1c. We think that, on a non-statutory basis the requirement should be the same as for other parts of the development plan, as set out in PM6, 1a. However, should national DM policies be introduced on a statutory basis then we would support PM6, 1c.
12) Do you agree with the approach to initiating plan-making in PM7? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree

Question	Response
12a) Please provide your reasons, particularly if you disagree.	A significant concern for us in achieving the 30-month preparation period is the time required by our constitution for sign-off by elected members, so we are pleased to see this specifically identified within PM7. Reference is made to the use of a four year plan evaluation report in policy PM7 para 2. We would expect that a template for this report will be available via the 'creating or updating a local plan' resource. Although we support the principle of speeding up local plan production and would support and agree with many of the measures included in the draft NPPF and being introduced, we think it should be recognised that achieve this will be a huge challenge for a plan area such as North Yorkshire, which has the largest geographic area of all local plans and for the first plan prepared under the new system.
13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
13a) Please provide your reasons, particularly if you disagree.	We particularly support the approach of using and updating existing evidence where appropriate, as well as preparing evidence jointly with other LPAs on cross boundary matters and using evidence prepared by other plan makers. Whilst preparation of a local plan must be based on appropriate and up to date evidence, we support this element of the NPPF which expands on para 32 of the 2024 NPPF, setting out that evidence should be relevant, proportionate, focused and sufficiently up to date.
14) Do you agree with the approach to identifying land for development in PM9? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
14a) Please provide your reasons, particularly if you disagree.	Detailed site identification information generally ok.
15) Do you agree with the policies on maintaining and demonstrating crossboundary cooperation set out in policy PM10 and policy PM11? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
15a) Please provide your reasons, particularly if you disagree.	Plan-making authorities are defined in footnote 5 of the draft NPPF. Will 'other relevant bodies' (referenced in PM10 (1) and DM1 (1a)) be defined in the regulations as 'prescribed bodies' previously were? How does this relate to the 'prescribed public bodies' under Requirement to Assist and DM 'statutory consultees'?

Question	Response
16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
16a) Please provide your reasons, particularly if you disagree.	Certainty is increased at plan-making stage but inputs into a viability appraisal are fluid and can change the outcome substantially in a short period of time. From Public Health: Policy PM12 should make it clear within part 3 criterion a what is defined as “other infrastructure”. This would ensure a developer would know how to positively respond and support the development by meeting the needs of the population/development.
17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
17a) Please provide your reasons, particularly if you disagree.	National policy should issue clarity and guidance of review mechanisms, but local plans should be able to set mechanisms to suit local circumstances.
18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly disagree
18a) Please provide your reasons, particularly if you disagree.	LPAs should have scope to set local standards based on local evidence and viability testing. While there is merit in establishing clear quantitative standards for infrastructure provision—particularly in giving developers, including large volume housebuilders, greater certainty and consistency—there are also significant concerns about the potential implications of applying national standards too rigidly. A single set of national standards risks creating uniformity across the country that does not reflect local character, local infrastructure constraints, environmental factors, or specific community needs. Over standardisation may result in developments that feel generic or disconnected from

Question	Response
	<p>their context, reducing place quality and local distinctiveness. Local authorities are best placed to understand their area's unique requirements. Therefore, while national guidance could provide a useful framework or baseline, it is essential that Local Plans retain flexibility to refine, adapt or exceed these standards where justified by local evidence. This would allow national standards to act as a starting point rather than a prescriptive requirement, ensuring development remains both deliverable and contextually appropriate. There are concerns that PM13 would prevent LPAs from requiring higher environmental or net zero standards for new homes. This restriction would unnecessarily limit innovation in decarbonising the construction industry and slow progress on climate mitigation and resilience. Local flexibility is especially important in areas facing acute fuel poverty or energy security challenges, where higher local standards can support long term affordability and sustainability. In summary, while national guidance can provide a useful baseline, PM13 imposes unnecessary constraints that would weaken local ambition, reduce the quality and distinctiveness of new development, and hinder progress towards net zero. From Public Health: Allowing for a local standard to be set in relation to accessibility standards would be welcomed. In North Yorkshire there is a rapidly ageing population. It is imperative that the planning system enable delivery of adequate provision of accessible and adaptable homes to meet current and projected future needs.</p>
<p>19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>19a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?</p>	<p>These comments relate to the preparation of local and minerals &amp; waste plans. We agree with the 'conformity' test as this is needed to align with wider changes relating to the requirement to prepare SDSs. The 'effective' test set out in NPPF 2024 ensured plans are deliverable over the plan period. The new 'realistic' test only requires there to be a reasonable prospect that plans can be delivered. We understand that the new 'realistic' test is intended to facilitate a more proportionate approach to demonstrating plan deliverability, however there is concern that this change provides a less stringent test in terms of deliverability. Plans need to be deliverable in order to meet an area's needs during the plan period (to reduce the risk of plans being 'undermined' if land supply issues arise. In terms of the 'consistent' test, as it is proposed that national DM policies are non-statutory, we think that plans should be able to address matters and include policies that are necessary and relevant to the plan being prepared which avoids unnecessary duplication of other parts of the development plan, as set out in policy PM6 1a. This may require modification of the content of some national DM policies where appropriate for any specific area. If national DM policies remain non-statutory, we do not agree with policy PM6 1c, however if they are introduced on a statutory basis we would support PM6 1c. If national policy is amended to frame minerals as optional rather than essential, inspectors may apply weaker scrutiny to minerals evidence and allocations. In relation to PM15 weakened minerals language in the NPPF with the removal of "essential" and the requirement of a "steady and adequate supply" would also make it harder for mineral planning authorities to demonstrate unmet need or supply risk is significant.</p>
<p>20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the</p>	<p>In terms of examining supplementary plans, we have the same comment made in response to question 19 &amp; 19a relating to the 'consistent' test where we feel that given the non-statutory nature of national DM policies, there needs to be some flexibility for these to be modified, where appropriate, in order for a plan to address locally area specific issues.</p>

Question	Response
other questions in this section?	
21)Do you agree with the principles set out in policy DM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly disagree
21a) Please provide your reasons, particularly if you disagree.	We think that there is a broader role for pre-application advice reflecting local circumstance.
22)Do you agree with the policy DM2 on information requirements for planning applications? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree
22a) Please provide your reasons, particularly if you disagree.	Developments have the potential to impact positively or negatively on Population Health. Applications should be accompanied by a statement setting out the potential impacts of the development and how the development is to mitigate any negative impacts which may occur. Major developments should be subject to a comprehensive Health Impact Assessment. Local validation lists should support the implementation by setting out the required scope and methodology for each development so that the developer knows how to positively react.
23)Do you have any views on whether such a policy could be better implemented through regulations?	No
24)Do you agree with the principles set out in DM3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly disagree
24a) Please provide your reasons, particularly if you disagree.	This should be proportionate, there is inherent tension in making timely decisions and addressing deficiencies at pre-app. Practically the proposal that decisions should not be delayed by late advice beyond statutory deadlines is difficult to operate because until that advice is received it's not possible to know whether it will enable an approval rather than a refusal. From Public Health: The Director of Public Health has a Statutory duty for the protection of the health of the Population. Developments can positively and negatively impact population and individual health. Health equity is a prerequisite for sustainable development and growth and, in turn, will positively influence economic and social development. Ensuring that public health considerations are embedded across all spaces and stages of development is crucial to achieving sustainable development. Embedding health outcomes and reducing health inequities must be central to planning. Local Authorities should be allowed to determine, in agreement with the Director of Public Health, which applications would require Public Health to be consulted.

Question	Response
<p>25)Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>neither agree nor disagree</p>
<p>25a) Please provide your reasons, particularly if you disagree.</p>	<p>Clarification that over-paying for land does not justify reduced contributions is welcome. However, there will always be circumstances due to value differentials and economies of scale which necessitate reassessment. Greater emphasis needs to be placed on the developer to be judicious in site assessments/scheme design and layout before agreeing land value. Experience suggests that many developers agree the full level of contributions at outline stage to be granted permission with the intention of renegotiation at reserve matters stage.</p>
<p>26)Do you have any further comments on the likely impact of policy DM5: Development viability?</p>	<p>no</p>
<p>27)Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved?</p>	<p>No strong views</p>
<p>27a) If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.</p>	<p>No views</p>
<p>28)Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government's commitment to boosting</p>	<p>No strong views</p>

Question	Response
the supply of affordable housing.	
28a) If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations.	No views
29)Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
29a) Please provide your reasons, particularly if you disagree. (not listed)	N/A
30)Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
30a) Please provide your reasons, particularly if you disagree.	Agree, however the policy needs to made clearer about when separate regulatory regimes are considered
31)Do you agree with the new intentional unauthorised development policy in policy DM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly disagree
31a) Please provide your reasons, particularly if you disagree.	Clarification is required regarding the reasonable interpretation of 'intentional' and how this works with the need to apply an objective planning balance. Intention to deceive has been decided in the courts and may effect when a unauthorised development is deemed unlawful - and this is not a policy matter.

Question	Response
32)Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?	Unnecessary- harm is harm irrespective of whether it intentional and should relate to the planning merits.
32a) If so, are there any particular additions or mitigations which we should consider?	N/A
33)Do you agree with the new Article 4 direction policy in policy DM10? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
33a) Please provide your reasons, particularly if you disagree.	N/A
34)Do you agree with the proposed approach to setting a spatial strategy in development plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
34a) Please provide your reasons, particularly if you disagree.	The proposals for producing a spatial strategy are logical. The clear expectation of SDS in comparison to 2024 NPPF is welcomed under S1. Under S2 this is strongly welcomed as a spatial strategy is the foundation upon which any sound plan needs to be formed from. The North Yorkshire Local Plan is expected to identify a Spatial Strategy. It could be added that each level of plan needs to align - i.e. any spatial strategy in Local Plan needs to align with SDS.
35)Do you agree with the proposed definition of settlements in the glossary? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree

Question	Response
35a) Please provide your reasons, particularly if you disagree.	We think further guidance is needed.
36)Do you agree with the revised approach to the presumption in favour of sustainable development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
36a) Please provide your reasons, particularly if you disagree.	This is dependent on further definition, see response to Question 35
37)Do you agree to the proposed approach to development within settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
37a) Please provide your reasons, particularly if you disagree.	The approach for development within settlements is supported. From Public Health: SD4, states that proposals in settlements should be approved unless the benefit of doing so would substantially be outweighed by any adverse effects. Criteria in paragraph 2 defined unacceptable impacts in relation to certain factors. Part 2 must include a criterion for refusing development where there is clear public health evidence to support the refusal as granting could cause increased risk to public health.
38)Do you agree to the proposed approach to development outside settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
38a) Please provide your reasons, particularly if you disagree.	We agree that the types of development identified are appropriate development types for countryside locations subject to including development type specific criteria and a requirement for proposals to meet thematic policies (comments on criteria proposed, where relevant, are set out under our response to Question 39). However, we consider that the following development types should be added following consideration of appropriate criteria, where necessary: householder development; community facilities where they are sited close to the communities they intend to serve (noting that some of these communities may not reside in settlements, for example, where comprised of several small collections of houses). We also consider that greater provision should be made to support the expansion of existing businesses located in countryside beyond that provided to those involving building extensions in S5(1c) and circumstances where an unmet need for storage and distribution can be demonstrated (S5(1j)). Under the proposals, significant employers based on large single user sites in the countryside needing to expand significantly (beyond extended a current building) would only be able to do this following the allocation of land in the development plan, which we consider will prevent expansion opportunities being realised. We also have concerns with S5, 1h. We

Question	Response
	support the principle of development around well-connected stations but think there should be some limits set on the scale of development such that strategic scale development must be plan-led as set out in policy HO4. Overall, we remain concerned that the policy could lead to development in unsustainable locations with poor access to services and public transport effectively failing to achieve the key aims of the policy. From Public Health: Paragraph 2 of SD5 must include a criterion for refusing development where there is clear public health evidence to support the refusal as granting could cause increased risk to population health.
39)Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree
39a) Please provide your reasons	S5(1g) - We do not consider it appropriate to require Gypsy, Traveller or Traveling Showpeople development to demonstrate unmet need in order for development to be acceptable in the countryside since such locations, rather than being exceptional, are where most proposals come forward and most development takes place. Councils are required to demonstrate a 5 year supply of specific deliverable sites for such development at all times. Where councils are able to do this windfall proposals in countryside would be unacceptable. With this in mind, we question the effectiveness of HO11(2c) requiring consideration of applications from those without local connections when councils have a 5-year supply as such proposals are unviable on windfall sites. We suggest that Gypsy, Traveller and Travelling Showpeople development should be acceptable in principle in the countryside in sustainable locations (defined appropriately for this type of development) and only require unmet need to be demonstrated where the location fails the sustainable location criteria. If any unmet need test is retained, we consider it should exclude appropriate intensification or modest expansion of existing sites in the countryside, particularly where these are privately owned and occupied.
40)Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
40a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and	We support the principle of land around stations being a focus for new development, but we have concerns about the scale of development that could potentially come forward through the policy as currently worded. Circumstances vary considerably around individual stations, e.g. site characteristics, constraints and connectivity to key services (e.g. railway lines do not always link to the nearest large settlement). Rural stations can also be remote from the settlement(s) they serve. Draft policy HO4 states that large scale developments should be plan-led. Although S5, 1h limits development to being "of a scale which can be accommodated taking into account the existing or proposed availability

Question	Response
Travellers and other groups with protected characteristics.	of infrastructure” we think that direct reference to policy HO4 should be made. We also think that what is meant by ‘reasonable walking distance’, is currently unclear. This should be clearly defined, including stated that it must be via a walkable route, not as a direct line distance and take account of topography. Finally we think that it should be clearer that all of the criteria listed under S5, 1h must be achieved. From Public Health: From a public health perspective, concentrating housing and mixed-use development around well-connected transport nodes can deliver significant health benefits through increased opportunities for active travel, improved access to services, and reduced car dependency. However, higher density can lead to adverse health outcomes if not planned and designed with robust health safeguards. We recommend that policy L3 and associated guidance explicitly references: Adequate daylight and sunlight standards – in accordance with policy P3; Children’s play space provision regardless of density constraints - in accordance with HC1(1)(d); Green infrastructure meeting locally specific standards - also in accordance with HC1(1)(d); Community and Public Service infrastructure capacity (GP surgeries, dental services, community facilities); Segregated active travel networks – in accordance with TR4 (1)(b); Air quality mitigation measures – in accordance with P3. Intensification around stations could inadvertently displace existing traveller sites or informal encampments as land values increase. We recommend that local planning authorities be required to assess impacts on existing traveller communities before designating station areas for intensification, ensure alternative provision is identified and secured before any displacement occurs.
41)Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy? Strongly agree, partly agree, neither agree or disagree, partly disagree, strongly disagree.	Partly agree
41a) If not, please provide your reasons	With the grant funding from Locality being removed we think neighbourhood plan groups will depend much more on support from LPAs to progress plans. Requiring neighbourhood plans to include allocations to benefit from this policy will add to that dependency. This would therefore represent as significant increase in the resources required to support neighbourhood plan preparation. The voluntary nature of neighbourhood plans also means that any requirement set out for them in the local plan could not be relied on. As such we would seek to make allocations in the local plan in line with our spatial strategy irrespective of designated neighbourhood areas and so any requirement would be dealt with through the local plan.
42)Do you agree with the approach to planning for climate change in policy CC1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
42a) Please provide your reasons, particularly if you disagree.	We agree with the approach set out. However, we think that it is rather unambitious and should require local plans to take a more holistic approach to locating development in the most climate resilient locations. The wording of CC1, 1a, i, could be stronger. This could be achieved by deleting ‘can help’ and ‘which can be’ so it reads ‘contribute to radical reductions in greenhouse gas emissions (informed by an assessment of baseline carbon emissions and the potential effect of development options on future emissions and their mitigation);’ From Public Health: Climate change is recognised as a significant risk to public health. Climate change disproportionately harms disadvantaged populations. Mitigation and adaption strategies must consider and avoid further exacerbation of existing health inequalities. The policy must

Question	Response
	reference health as a factor impacted by climate change and outline mitigation strategies specifically focused on addressing these risks. For example, recognising that green infrastructure and nature-based solutions can benefit health resilience as well as nature resilience, as stated in Policy CC1 paragraph 1d. Health Effects of Climate Change (HECC) in the UK: State of the evidence 2023 (UKHSA, 2023) states “Many infectious diseases are highly climate sensitive, and with warmer temperatures we can expect an increased risk of new and emerging infectious diseases in the UK, including those transmitted through mosquito and tick bites. In light of this, and while accepting that the list of climate risks identified in policy CC1 is intended to be illustrative rather than exhaustive, the addition of “disease vectors” (e.g. breeding habitats for mosquitoes) to this list would enhance illustrative value to the range of climate related health risks the planning system needs to consider.
43)Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
43a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?	We consider that CC2 (1a) should be amended so that the requirement for 'a genuine choice of sustainable transport modes' allows development where these already exist but also where this would be brought about by development. In addition CC2 (1c) should be amended to require proposals to reduce embodied carbon emissions, for example, "approaches which conserve energy and other resources and reduce embodied carbon emissions in accordance with policy DP3(1c)". Consequential amendments should be made to DP3(1c). DM Comment: All policies should be given substantial weight. From Public Health: For clarity developers and decision makers make use of the word “must” within policy CC2 rather than “should” this would provide clear actionable requirements which must be undertaken when applicable to development.
44)Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree
44a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?	Policy CC3 (and DP3) could go further regarding preventing buildings overheating as a consequence of rising summer temperatures and the increasing heatwave events. Recommended wording amendment to ensure that development proposals “must” take account of the current and potential impacts of Climate Change over the lifetime of the scheme, including those impacts on current and future populations. Vulnerability considerations and risks from flooding in criterion should be applied to the impact upon public and human health. Paragraph d) could go further and provide requirements for passive cooling. This would help reduce health risks of overheating and reduce an increase in energy use from the use of air-conditioning units.
45)Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be	Partly disagree

Question	Response
mitigated? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
45a) Please provide your reasons	We consider that policy CC3 (1E) doesn't clearly explain when wildfire risks should be considered and may introduce onerous requirements where not needed. The policy states 'areas at or likely to be at heightened risk' and goes on to set out adjacent land uses that include almost all countryside adjacent to development anywhere in England. We consider that consideration of heightened risk should be evidence based and take account of the UK Climate Change Risk Assessment 2022 (CCRA3) and future CCRA4, expected to outline specific risks at a sub-national level alongside adjacent land uses.
46)How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?	N/A
47)Do you have any other comments on actions that could be taken through national planning policy to address climate change?	Policy should provide for refusing development on the grounds of creating unacceptably high levels of carbon emissions.
48)Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
48a) Please provide your reasons, particularly if you disagree.	We agree with most of what is set out in policy HO2. However, we think that part 5 relating to neighbourhood plan areas is not an improvement over the current NPPF. We question the reasoning for setting housing requirements for neighbourhood plan areas. We think that the site assessment and allocation process is better handled by professional planners as part of the preparation of the local plan. The voluntary nature of neighbourhood plans also means that whatever requirement is set out would not necessarily come forward which creates uncertainty. Furthermore, with grant funding from Locality being removed we think that expecting neighbourhood plans to include allocations will add to the burden on local authorities to support neighbourhood plan production because qualifying bodies will depend more on support from local authority planners. There needs to be careful thought about whether it is appropriate to include Gypsy and Traveller Pitch requirements in the SDS for a number of reasons. This would require the careful timing of the preparation of GTAAs across the region to enable a requirement to be identified and unlike housing the need for G&T pitches are much more localised and person specific, often being derived from family circumstances/need on individual sites rather than some form of standard methodology. Stating a figure for need does not tell the full picture and can be misleading as it isn't often a true reflection of actual pitch need until more detailed work has been undertaken as part of local plan allocation work. It is often the fact that a pure number pitch need of 400 for example only actually relates to the need to find

Question	Response
	<p>a small percentage of that on the ground through sites because further pitch delivery work identified that some of that need no longer applies, the majority of it can be met on existing sites (because it is need from that particular family) or small extensions to family sites. The overall need for finding new allocations is often very small. From Public Health: There is NO reference to care markets / affordable care provision throughout the Document given there are references to other national policies / examples of specific developments and the high profile and importance of social care it would be pertinent to include strategic links to Adult Social Care reform. In this context we expect to see direct links to related regulatory regimes; for adult social care this is the Care Quality Commission. Policy HO1 must have regard to the Statutory Market Position Statements of the Local Authority, as outlined in the Care Act 2014, as key evidence in identifying local housing needs of the area.</p>
<p>49)Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>49a) If so, what elements should this guidance cover?</p>	<p>Draft Policy HO1: Assessing the need for homes includes a list of groups (but notes it's not limited to these groups) For North Yorkshire Council these groups are identified in the Council's HEDNA which provides overall data to guide demand and looks at the data held by the Housing and Health &amp; Adult Services teams. While guidance may be helpful it should not override local housing need assessments. From Public Health: Currently the NPPF doesn't have clear links to the Care Act or mention the needs of social care and meeting the housing / housing with care and support needs of people with social care needs including those under long-term hospital detention that will require accommodation for community release. Additionally, The Mental Health Bill which will require additional community accommodation to prevent hospital admissions must be taken into account. Enabling people to live at home longer without the need for care homes should be a priority for this Government and the NPPF is a delivery mechanism for this. Clear guidance in the NPPF is required. In relation to references to increase provision in rural areas, more detailed guidance around infrastructure development over and above what is set out in HC3 / 4; i.e. transport, schools, health and social care services, community facilities would be beneficial. Health Impact Assessment guidance for developers would be welcomed; this would ensure that developers proactively know what is required as part of their development to meet the need of different populations to ensure that sustainable development can be truly delivered.</p>
<p>50)Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>50a) Please provide your reasons, particularly if you disagree.</p>	<p>We agree that there is a need to treat provision of G&amp;T provision alongside open market housing, however as detailed in our response to Q48, disagree that the requirements should be outline in SDS's. From Public Health: Gypsy and Traveller communities face some of the most significant health inequalities in the UK, with evidence showing lower life expectancy, higher rates of mental ill-health, increased prevalence of</p>

Question	Response
	chronic conditions and poorer maternal and child health outcomes. The location of any future Gypsy and Traveller sites is therefore critical to minimising the impact of any planning decision on the communities and reducing the impact of health inequalities. Historically, sites have been situated near busy roads or in isolated areas with limited access to essential local services, such as healthcare, education, employment opportunities and public transport. Ensuring appropriate site location can also help reduce tension with the settled community, supporting the development of sustainable, inclusive environments where Gypsy and Traveller families can access opportunities, feel safe and take part in local life. When considering the wider needs of Gypsy, Roma and Traveller communities, it is essential to draw on existing local evidence including Health Needs Assessments and local strategies focused on reducing health inequalities.
51)Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Neither agree nor disagree
51a) If so, what are the key principles this guidance should establish?	N/A
52)Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their 42 local plan 5-year housing land supply? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
52a) Please provide your reasons, particularly if you disagree.	No alterations to Standard Method, would refer to the previous comments from the LPA on the suitability of the revised Standard Method.
53)Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making? Strongly	Strongly agree

Question	Response
agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
53a) Please provide your reasons, particularly if you disagree.	.
54)Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
54a) Please provide your reasons, particularly if you disagree.	We have concerns about the terminology of travellers used. See comments in regard to Equality.
55)Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
55a) Please provide your reasons, particularly if you disagree.	We fully support the provisions set out in policy HO4, particularly that new settlements should be Local Plan-led. However, we think that there is potential conflict between the approach set out by this policy and that of policy S5, 1h. We support the principle of development around train stations, particularly those that are well-connected. Where policy S5, 1h would potentially lead to strategic scale development we think this should be limited to being plan-led. The approach proposed is likely to divert LPA resources to speculative applications of strategic scale on ultimately unsuitable sites, rather than focussing on more suitable locations which have benefited from the scrutiny afforded by the development plan process. From Public Health: Policy HO4 should embed reference to supporting the creation of healthy and sustainable communities and ensure that large scale developments take account of the health needs of the future population. In doing so the policy should make it clear what infrastructure to support the development would be expected.
56)Do you agree our proposed changes to the definition of designated rural areas will better	Partly agree

Question	Response
<p>support rural social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	
<p>56a) Please provide your reasons, particularly if you disagree. (not listed)</p>	<p>It makes it clearer to easily determine what is rural and what is not. However, we are not as clear as to how it directly leads to more affordable housing being secured. From Public Health: In relation to references to increase provision in rural areas, it may be helpful to provide more detailed guidance/framework around infrastructure development over and above what is set out in HC3/4; i.e. transport, schools, health and social care services, community facilities.</p>
<p>57)Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Strongly agree</p>
<p>a) Please provide your reasons, particularly if you disagree. (not listed)</p>	<p>Increasing stock will help to support the needs of our aging population, promote inclusion and independent living for those with mobility issues. Evidence shows that the cost of achieving M4(2) has limited impact on viability, as such we would support a target higher than 40%. The NYC HEDNA supports all dwellings where site suitability allows should be built to M4(2) standards. While building some dwellings to M4(3) has a greater impact on viability, it would reduce the costs of adaptations and result in better outcomes (note there is a significant difference in costs between M4(3)(a) and M4(3)(b)) and as such a clear expectation should be set that a proportion of homes should be built as wheelchair accessible. This aligns with the evidence of need set out in NYC's HEDNA. From Public Health: The minimum required M4(2) and M4(3) homes could be set out in policy; allowing flexibility for Local Authorities to set a higher level where local circumstance and evidence demonstrate a higher need.</p>
<p>58)Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Strongly disagree</p>
<p>58a) Please provide your reasons, and would you support an alternative minimum percentage requirement?</p>	<p>We are broadly supportive of 40% of homes to be built to M4(2), if set as a national minimum. However, Local Authorities must be able to set their own percentage above the 40% in their Local Plans, based on local evidence. For North Yorkshire Council 40% would be too unambitious. From Public Health: The NPPF is proposing a national minimum that ensures at least 40% of new housing over the course of the plan period is delivered to M4(2) standards, formalising best practice and driving up provision in areas without clear requirements." However, in areas like North Yorkshire, with a rapidly ageing population, would this requirement be sufficient? Flexibility to apply higher</p>

Question	Response
	standards based on local circumstances should be built into the NPPF. By allowing for a high level of M4(2) in areas with greater need would help ensure people remain in their homes and their communities as they age reducing the need for specialist older person housing.
59)Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
59a) Please provide your reasons, particularly if you disagree.	In principle allocating sites or parts of larger sites for different groups, where there is a need identified, is supported, however we need to consider how this would work in practice and it must not limit the ability of windfall applications for specialist accommodation. One group not referenced in draft NPPF is specialist accommodation for adults with a learning disability. Care would be needed to ensure housing for groups with an identified local need are not overlooked.
60)Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
60a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?	It is not clear why 150 homes or more has been chosen as a site size, LPAs should be able to set the threshold based on local evidence. Again, LPAs should be able to consider the broad mix of tenures to be provided based on evidence of need.
61)Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares? Strongly agree, partly agree, neither agree nor disagree, partly	Partly agree

Question	Response
disagree, strongly disagree.	
61a) Please provide your reasons	<p>This suggested approach differs from current NPPF, which currently requires 10% of small sites to be 'identified', not 'allocated'. By using the term 'identified', the current NPPF allows for the 10% of small sites to be achieved through allocations and through windfall development. It is proposed that draft policy HO6, criterion a) be amended to replace the word 'Allocate' with 'Identify', thereby ensuring windfall development on small sites can be included in each of the 10% requirements. This suggested approach also differs from current NPPF, which requires LPAs to accommodate at least 10% of the housing requirement on sites no larger than one hectare, whereas policy HO6 in the draft NPPF adds wording to require local plans to allocate land to accommodate a further 10% of the requirement on sites of between 1 and 2.5 hectares. It is agreed that the requirement to ensure 10% of total allocations are on small sites of 1ha and a further 10% of total allocations are on sites sized between 1ha and 2.5ha, as this would provide greater certainty to SMEs and enable them to bring forward a steady supply of housing on smaller sites (which are generally more straightforward to deliver) throughout the plan period.</p>
62)Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?	<p>Appropriate evidence should be clearly defined. In relation to older peoples accommodations, in addition to the local housing needs assessment the Market position statement of the Local Authority care homes, extra care and the likes, consultation with the Social Care team is essential to ensure that appropriate evidence is used to determine the application.</p>
63)Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered 46 as part of affordable housing requirements, will successfully enable the provision of military homes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	<p>neither agree nor disagree</p>
63a) Please provide your reasons, particularly if you disagree.	<p>We have concerns about the impact this policy change would have on the delivery of Affordable Housing. We would question whether affordable housing policy is the appropriate policy tool to address meeting the housing needs of military personnel and would welcome alternative policy approaches to address this issue. A high degree of coordination between the LPA and MoD will be required to ensure the homes are delivered when and where required. MoD will need to communicate the specification of these homes so they can be viability tested alongside other plan requirements. Mechanisms will need to be considered to ensure these homes remain affordable when no longer required by service families. From Public Health: The NPPF could be clearer with a definition of 'Military affordable housing'; 'housing' includes: homes designated and reserved for use by serving military personnel living off-base; homes designated for ex-military personnel; access to housing for people leaving the military and re-housing of civilian partners/families in cases of relationship break down. There could be closer links to: <a href="https://www.gov.uk/government/publications/improving-access-to-social-housing-for-members-of-the-armed-forces/improving-access-to-social-housing-for-members-of-the-armed-forces">https://www.gov.uk/government/publications/improving-access-to-social-housing-for-members-of-the-armed-forces/improving-access-to-social-housing-for-members-of-the-armed-forces</a>. Exempting military housing from the requirement to provide a range of tenures, apart from affordable housing, reduces options and flexibility for a population group that may need it most, and be less likely to buy property. As 'military affordable housing' is restricted to a single population group, it should result in an evidence-based uplift to existing civilian affordable housing</p>

Question	Response
	requirements within Local Plan areas with a significant military presence such as North Yorkshire. This would guarantee that delivery is proportionate to local need, and to maintain affordable housing requirements on civilian developments and those that mix civilian and military housing.
64)Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly disagree
64a) Please provide your reasons, particularly if you disagree.	Its not clear what is meant by " <i>a flexible approach should be taken to the application of any development plan requirements relating to the size of market homes, taking into account prevailing market conditions.</i> " While securing affordable housing on site is important it should not be at the expense of the overall scheme and the delivery of market housing of the size and standards to meet the identified need. Being able to consistently require a suitable mix of sizes is seen as an important tool in addressing overall housing affordability. From Public Health: The UK has some of the smallest space standards among Europe with some homes not even meeting minimum standards (Britain's 'shoe-box' houses among smallest in Europe - <a href="https://www.architectsjournal.co.uk/news/britains-shoe-box-houses-among-smallest-in-europe">https://www.architectsjournal.co.uk/news/britains-shoe-box-houses-among-smallest-in-europe</a> ). Developers should not be allowed to reduce the size of market homes, particularly if these are then to be allocated as affordable housing. Homes should be adaptable to changes in family size and circumstances, including change of health status or disability, which may require equipment, enabling them to remain in their home and community without needing to move house. Homes must, as a minimum, meet nationally described minimum space standards to provide equity regardless of tenure.
65)Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
65a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?	This would need to be determined taking account of evidence of need. A minimum requirement would be welcomed, with the ability to require a higher proportion also possible where tested through local plan Whole Plan viability testing. From Public Health: Policy requirements to broaden the range of tenures are welcomed. Further requirements to go beyond a minimum delivery threshold would be welcome, calibrated locally to average profit margins, helping to further reduce housing-related health inequalities. This should include strengthening requirements that social rented housing is distributed throughout developments, not grouped together, and provided at a range of sizes and rental value, designed to the same standards as market homes, to blend in throughout the site, well-located with equitable access to all site amenities and not located in the least favourable locations. The development size could match that for affordable homes, (delivered on sites of 10+ units) ensuring sustainable development of sites.

Question	Response
66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards?	The question refers to affordable temporary housing such as <i>stepping stone housing</i> but neither <i>stepping stone housing</i> or <i>affordable temporary housing</i> are referred to either in the Draft NPPF or the glossary. It's presumed this means emergency housing, hostels etc. to provide a short-term bridge between homelessness and permanent housing for which there is a shortage and support would be welcomed. However, while space needs may vary depending on the accommodation to be provided, a relaxation for schemes to support single people e.g. rough sleeping hostels may be appropriate, however there would be no support for reduced space standards for accommodation designed for families with children. From Public Health: No. Having a planning system methodology that adequately provides a sufficient local supply needs then temporary accommodation of a different size should not be required. All new housing should be able to comply with existing enforcement requirements and nationally described space standards.
66a) If so, what changes would be beneficial?	A clearer definition and ability to be flexible in its implementation to meet the needs of the future occupier.
67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly disagree
67a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.	We have concerns about the impact this policy change would have on the delivery of Affordable Housing. It may limit the ability of the authority to deliver homes where need is greatest, finding land to deliver homes using cash contributions would be an additional challenge, placing the onus on the LPA to find land. This would impact on Registered Providers too, who often rely on S106 on site delivery to secure new affordable homes. The fact that on-site provision is the preferred option is welcomed. While the other two approaches (off-site delivery and in lieu payments) may be valid, the former is considered preferable to the latter. Such a sequential approach should therefore be reflected in the policy rather than giving equal weight. Making a linkage between developing medium-sized SME schemes and smaller infill sites for affordable provision in the same town has been deployed in North Yorkshire. The problem which can arise with in lieu payments is finding suitable sites where affordable provision can be made and still be reasonably related (geographically) to the proposed development. We wouldn't encourage any further increase of size in the medium category. From Public Health: Building offsite social housing doesn't result in sustainable or inclusive developments. Social rent accommodation in the Green Belt is essential to combat inequalities; however, this would need to be adequately supported with adequate accessible supporting infrastructure.
67b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in	Developers have the opportunity to submit a viability appraisal to determine whether it is viable for homes to be delivered on site, so this provision already exists. Other factors which are taken into account locally alongside the evidence in the HEDNA are local assessments of housing need, local housing market assessments and practical considerations about the locality and ability of the site to accommodate a mix of housing.

Question	Response
<p>certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer</p>	
<p>68)What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).</p>	<p>We are concerned that this policy change would have unintended consequences for land values and delivery patterns. Removing or weakening the expectation of on-site affordable housing is likely to increase land value expectations, as landowners recognise that developers would face reduced affordable housing obligations. This would constrain viability and reduce the overall ability to secure affordable homes through development. There is also a significant risk that applicants would design schemes to fall below any new trigger in order to avoid requirements. This would further reduce affordable housing supply. A shift away from on-site provision would undermine the creation of mixed and balanced communities, resulting in spatial inequality and reduced social integration. Small and medium registered providers would also be disproportionately affected. They rely heavily on acquiring affordable homes through s106 on medium sized sites. Reducing on site requirements would limit their development pipeline and weaken their ability to deliver.</p>
<p>69)What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly? Please explain your answer.</p>	<p>We support the continued default expectation of on-site affordable housing through Section 106, reflecting national policy priorities for mixed, balanced communities and ensuring delivery. On site provision best meets the NPPF’s emphasis on creating inclusive places and mixed communities. Where on site delivery is not feasible, commuted sums can play a useful role, as set out within local policy. If the NPPF is to tackle this issue, it can be supported by providing clearer and more consistent national guidance. To ensure contributions are usable, timely and equivalent in value to on-site provision, we recommend that Government: 1. Introduce national guidance and a model formula for setting commuted sums, using standardised inputs (land, build, fees, risk allowances). This would ensure contributions fully reflect the cost of delivering the equivalent affordable housing elsewhere and remain compliant with Reg.122 tests. 2. Clarify how LPAs may pool affordable housing commuted sums across appropriate geographic areas. The pooling restriction was removed in 2019; updated guidance should confirm how pooling can operate transparently through Infrastructure Funding Statements while continuing to meet the Reg.122 tests. 3. Provide support for assembling deliverable sites (e.g. Home England) for affordable housing funded by commuted sums. This would help LPAs, RPs and public sector landowners unlock constrained sites and accelerate delivery. 4. Confirm that off-site contributions should reflect additional delivery risks and costs such as land acquisition in high value markets. This ensures developers are not incentivised away from on-site provision. These measures would support consistent, transparent and effective use of commuted sums while maintaining the primacy of on-site affordable housing delivery.</p>
<p>70)Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?</p>	<p>We do not support expanding or normalising the use of cash in lieu contributions. National policy appropriately prioritises on site affordable housing because it is central to achieving mixed, balanced communities and avoids the risks of mono tenure development.</p>
<p>70a) If so, what elements and principles should this guidance set out? Please</p>	<p>Where cash in lieu is considered, any contribution must continue to be assessed through the statutory Regulation 122 tests, ensuring it is necessary, directly related to the development, and fairly and reasonably related in scale and kind. To maintain the integrity of on-site delivery, national guidance should make clear that off-site contributions must fully reflect the additional costs, risks and delivery work required</p>

Question	Response
<p>explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which is the equivalent value of providing affordable housing on site, based on a comparison of the Gross Development Value of the proposed scheme with the Gross Development Value of the scheme assuming affordable housing was provided onsite.</p>	<p>to provide equivalent affordable homes elsewhere, including land acquisition, procurement, project management and inflation exposure, so that developers are not financially incentivised to opt out of on-site provision. Decisions on whether cash in lieu is acceptable should remain with local planning authorities, who are best placed to judge site specific design constraints, tenure mix objectives and spatial housing needs.</p>
<p>71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly disagree</p>
<p>71a) Please provide your reasons, particularly if you disagree.</p>	<p>We strongly support maintaining the clear national expectation that affordable housing should be delivered on site as part of mixed, balanced communities. On site provision provides the greatest certainty of delivery and avoids the creation of mono tenure areas, a risk that has been well documented in national evidence. Where developers propose off site delivery or cash in lieu, this should remain exceptional and subject to strict application of the Regulation 122 tests, ensuring the contribution is necessary, directly related to the development, and fairly and reasonably related in scale and kind. Off-site provision should only be considered where robust evidence demonstrates that on site delivery is genuinely unachievable due to site specific constraints, and where alternative delivery would better align with identified affordable housing needs. Even in such cases, there is a clear risk that off-site mechanisms can unintentionally shift affordable housing into lower value areas, reducing tenure mix and weakening the supply of the types of homes needed across North Yorkshire. Maintaining a high threshold for accepting off site arrangements is therefore essential to safeguarding mixed communities and ensuring affordable housing delivery reflects local housing needs and place making objectives. From Public Health: Quality should not be sacrificed over quantity. Offsite provision should not be a preferred approach and used in very limited circumstances. To create 'sustainable and inclusive communities' development sites must include a broad range of tenures, including affordable housing. Over reliance on financial contributions risks weakening delivery certainty, creating delays in affordable housing delivery, and concentrating new affordable homes in lower value areas, which in turn can worsen spatial inequalities. Maintaining strong local discretion, alongside a high evidential threshold for accepting off site contributions, is essential to protecting mixed tenure communities and ensuring affordable housing policy outcomes are achieved.</p>
<p>72) Do you agree with the criteria set out regarding the locations of</p>	<p>Partly disagree</p>

Question	Response
specialist housing for older people? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
72a) Please provide your reasons, particularly if you disagree.	We are broadly supportive of policies to support the delivery of specialist housing in the right locations. From Public Health: HO9 does not go far enough to support the needs of this population. It is unclear where care provision fits (for older people and other groups) as not referenced here. There is no clear definition about what 'specialist community-based accommodation' is and no reference to requirement to meet any local demand/needs assessment or quality / design guide standards published locally. In addition to the criteria proposed it is essential that developments are well-designed, accessible and inclusive. Access to local amenities including shops and outdoor accessible spaces should be referenced as well as transport. This will ensure that people are able to connect with others and support the health and wellbeing of older populations. Housing for older people should have infrastructure requirements as (HO9 c) and a need to reflect the accessibility of that infrastructure. (Older people place a higher burden on local GP services for example and may have increased need to access healthcare) Mentioned earlier the rationale for setting realistic M4(3) quotas but they are also likely to require a decent management plan. It is also important to remember that intergenerational mixing has several health and well-being benefits and so making all homes either M4(2) or M4(3) will create a more sustainable pool of homes for life.
73)Do you agree with the criteria set out regarding the locations of communitybased specialist accommodation, including changes to the glossary? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Neither agree nor disagree
73a) Please provide your reasons, particularly if you disagree.	The Policy refers to <i>specialist community-based accommodation</i> while the glossary refers to ' <i>community-based specialist accommodation</i> '. It's important that the wording in the Glossary reflects that in the Policy to avoid ambiguity.
74)Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree

Question	Response
74a) Please provide your reasons, particularly if you disagree.	The wording of HO9 refers to purpose-built student accommodation and large-scale shared living accommodation, while the glossary refers to HMOs, student accommodation, hotels and other residential institutions suggest the policy wording aligns with the glossary to ensure the policy is clearer.
75)Do you agree the proposals provide adequate additional support for rural exception sites? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
75a) Please provide your reasons, including what other changes may be needed to increase their uptake?	We support the inclusion of an exception sites policy to provide affordable housing where there is a clear identified need. We support the continued and strengthened use of rural exception sites as an important mechanism for delivering affordable housing in rural communities. Many smaller settlements in North Yorkshire have significant affordable housing needs that cannot be met within existing development boundaries, and exception-site policies provide a vital route for meeting those needs in a plan-led and locally responsive way. A dedicated exception-sites policy could be helpful if it strengthens plan-led delivery, but it must not unintentionally normalise dispersed countryside development or undermine the objective of integrating G&T accommodation into sustainable, well-served locations.
76)Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
76a) Please provide your reasons, particularly if you disagree.	We agree with removing First Homes exception sites as a separate site type. Rural exception sites should prioritise the types of affordable housing that best meet local need.
77)Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Neither agree or disagree. One of the main issues with securing exception sites is the willingness of a landowner to release the land for what is considered less than a market value and often landowners will retain the land until such time as it becomes acceptable for mixed tenure development. A BLV may assist in landowner decisions to release the site.
77a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation	A per plot BLV would be preferable to multipliers of agricultural values as these can vary considerably depending on location and grade of land.

Question	Response
document is the most beneficial for government to set out?	
78)Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly Disagree
79)Please provide your reasons, particularly if you disagree.	<p>We disagree with Part 2 of the policy. It is unclear what 'take into account' means in the context of considering proposals. To what extent do they need to be taken into account and how would this consideration lead to approval/refusal. This policy is designed to be used to assess proposals in all locations including those within settlements and therefore it is inappropriate to add additional criteria for sites over and above those that would be required for market housing. Why should personal circumstances be a consideration when it is not for market housing and SO4 accepts that there is a presumption in favour of approving development within settlements. This surely presents a bigger test for gypsy and traveller development to meet which is unreasonable. It is also not appropriate or practical to ask for the existing level of provision to be considered. This reads as though existing vacancies on sites should be weighed against the proposal which is not appropriate and also is contrary to considering the personal circumstances and accepting proposals from those without local connections. Vacancies on existing private sites for example can not be considered as being available for other families to move into so should not be considered. Assessing existing provision also fails to take into account potential cultural differences etc that may be at play e.g. the difference between Roma and Irish Gypsies where it would not be fair to expect shared accommodation. The consideration should be about level of need rather than level of existing provision. From Public Health: We welcome the consolidation of traveller site policy into the main NPPF framework and the explicit recognition of health considerations within policy HO12. The inclusion of requirements for access to education, welfare, and health services (HO12(1)(b)), opportunities for healthy lifestyles including adequate play areas (HO12(1)(c)), and minimising adverse impacts from noise and air quality (HO12(1)(c)) represents positive progress in addressing the significant health inequalities experienced by Gypsy, Roma and Traveller communities. Gypsy and Traveller communities face some of the most significant health inequalities in the UK, with evidence showing lower life expectancy, higher rates of mental ill-health, increased prevalence of chronic conditions and poorer maternal and child health outcomes and greater prevalence of long-term conditions (Marcelline, 2024). The location of any future Gypsy and Traveller sites is therefore critical to minimising the impact of any planning decision on the communities and reducing the impact of health inequalities. Historically, sites have been situated near busy roads or in isolated areas and with limited access to essential local services, such as healthcare, education, employment opportunities and public transport. Ensuring appropriate site location can also help reduce tension with the settled community, supporting the development of sustainable, inclusive environments where Gypsy and Traveller families can access opportunities, feel safe and take part in local life. When considering the wider needs of Gypsy, Roma and Traveller communities, it is essential to draw on existing local evidence including Health Needs Assessments and local strategies focused on reducing health inequalities.</p>
80)Do you agree the proposals in policy HO13	Partly agree

Question	Response
<p>will help to ensure development proposals are built out in a reasonable period? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>The proposals are acceptable as far as they go. Having the discretion to impose a shorter timescale than the statutory default may assist, especially if renewal of planning permission is being sought, but there often other root causes for delayed implementation e.g. land/infrastructure cost vs financial return, changes in housing market, ransom strips etc. largely falling outside planning process. Further mechanisms will be required to ensure this isn't a gimmick but a positive tool for speeding up development.</p>
<p>81)Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale development are supported? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Especially on larger multi-stage schemes a period of longer than 3 years is required, and can often take much longer to be built out (in some cases over 10 years) for reasons often outside LPA control. In areas where the housing market is less buoyant, the stalling of sites or very slow delivery can be a significant problem – for example, volume housebuilders move their construction teams onto smaller more profitable sites as and when it suits to the detriment of sites which will deliver key infrastructure.</p>
<p>82)Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? Yes, no</p>	<p>Yes</p>
<p>82a) Please provide your reasons.</p>	<p>Unlike the post-war era of new/expanded towns there is not a well-established delivery vehicle, so LPAs are having to learn the best approach in an ad hoc manner, often lacking previous experience of managing such a complex process. Land assembly (possibly through CPO), as well as governance to create a sustainable integrated community from its early days, are significant challenges. Delivery of essential infrastructure at an early stage is often problematic; developers understandably want to see an early return, delaying infrastructure, but travelling to other established towns for services then becomes embedded behaviour for early residents. A straightforward mechanism to ensure financial support to deliver infrastructure early (with subsequent clawback measures) would assist. Policies/measures to ensure actual</p>

Question	Response
	delivery of new town/neighbourhood centres would help. Housebuilders are often not interested, and particularly in the climate of High Street decline it is difficult to secure a new centre with a vibrant retail/leisure offer.
83) Do you agree with the proposed changes to the Housing Delivery Test rule book? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Neither agree nor disagree
83a) Please provide your reasons, particularly if you disagree.	A strengthening of the consequences if the LPA fails to meet its requirement as per the Housing Delivery Test ensures the LPA is susceptible to speculative developments as was highlighted as a concern in the LPA's previous response at the time of the proposals to alter the Standard Method. Meeting 75% of the requirement in the short term - in the absence of a newly adopted Local Plan, and without transitional arrangements - will leave the LPA vulnerable to non-Plan led development outside settlements.
84)Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree
84a) Please provide your reasons, particularly if you disagree.	Policy E1 should take account of the health of the population as a determinant to economic growth. Poor health is linked to poor economic growth and acknowledging the relationship between the two within the planning system would help support and deliver sustainable development.
85)Do you agree with the approach to meeting the need for business land and premises in policy E2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
85a) Please provide your reasons, particularly if you disagree.	For clarity Policy E2 should consider the inclusion of a criterion that would seek to refuse planning permission where the impact of the development would result in harms to public health, including through the loss of being able to meet the needs of a national supply of food as a result of loss of agricultural grade land.
86)Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?	Strongly agree

Question	Response
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
86a) Please provide your reasons, particularly if you disagree.	.
87)Do you agree with the approach to rural business development in policy E4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
87a) Please provide your reasons, particularly if you disagree.	.
88)Do you agree with the proposed changes to policy for planning for town centres? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
88a) Please provide your reasons, particularly if you disagree.	Long term strategies for town centres linked to housing strategies could secure long term improvements which respond to changing markets and circumstances and therefore reduce the decline of traditional centres. The requirement is for a clear, proactive town centre strategy that supports diversification, intensification, new residential opportunities, and aligns with planned infrastructure and public realm investment. This could require a lot of time, specialist input, and evidence gathering to prepare robust town centre strategies that can be examined and implemented effectively.
89)Do you agree with the approach to development in town centres in policy TC2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree
89a) If not, please explain how you would achieve this aim differently?	We agree with the direction of Policy TC2, which gives substantial weight to proposals that strengthen town centre vitality and diversify uses, but preparing the town-centre strategies required by the revised NPPF will place additional time and resource demands on Local Plan team. We also support proposals to meet the needs of the rural economy. From Public Health: Whilst supporting the vibrancy and vitality of town centres is welcome, it would be useful for the policy to clarify that this must not come to the detriment of the health of the local or visiting population. Consider including a criterion C which states “Development that would result in increased risk of harm to the health of the population should not be granted.” this would ensure that a balanced judgement is achieved for sustainable development.

Question	Response
90)What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?	We do not currently have specific evidence assembled which would support a response to this question but generally we can observe that the introduction of E class has had both beneficial and less beneficial impacts. As intended by the changes, we have seen some re-use of vacant premises for alternative uses, benefitting from the additional flexibility, but we have also seen some amenity impacts (e.g. poorer quality frontages resulting from conversion of shop fronts to residential). From Public Health: Use class E is broad, and it is difficult to guarantee the preferred type of use which would best support communities in terms of achieving Healthy communities (chapter 16). Although the sui generis definitions applicable to health harming activities like alcohol retail, hot food takeaways and gambling premises does help. Gambling health harms are well documented and the inclusion of a clear national policy to help to restrict the number of gambling premises in an area would be welcomed.
91)Do you believe the sequential test in policy TC3 should be retained? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
91a) Please provide your reasons, particularly if you disagree.	There are strong arguments for retaining the sequential test, as it continues to play an essential role in protecting town centres from harmful out of centre competition and aligns with the NPPF's strengthened town centre first strategy. Without the test, large out of centre Class E premises could bypass policy and undermine high streets. It is acknowledged that the test can slow decision making and may not always reflect modern patterns of commercial use but retaining it is still necessary – the test may benefit from simplification and/or updated guidance.
92)Do you agree with the approach to town centre impact assessments in policy TC4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
92a) Please provide your reasons, particularly if you disagree.	This test is important to retain but will now be tied to local plan 'town centre strategies' which will increase workload for plan-making and decision-making, so adequate resourcing and guidance will be essential. From Public Health: The inclusion of the need for local impact assessment is welcomed. However, this must also include an assessment of the known and potential health impacts associated with development.
93)Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Neither agree or disagree
93a) Please provide your reasons, particularly if you disagree.	Agree that the updated policies provide clear and strong support for the rollout of 5G and gigabit broadband but note this is only in response to proposals as they come forward. The existing requirement for planning policy to positively support this important agenda has been removed and while we note that specific technical requirements are set out through Building Regulations, we consider planning policies can

Question	Response
	help deliver effective rollouts, for example, when new settlements or urban extensions are planned by ensuring this critical infrastructure is considered from the outset and applicants engage effectively with infrastructure providers.
94)Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Neither agree or disagree - it is about considering the proposal's context and impact in the locality in which it is situated, and that should be minimised as much as technically possible (including mast sharing), but it is also about ensuring communities have access to what is now seen as essential infrastructure.
94a) Please provide your reasons, particularly if you disagree.	NA
95)Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
95a) Please provide your reasons, particularly if you disagree.	N/A
96)Do you agree with the approach to planning for energy and water infrastructure in policy W1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
96a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?	N/A
97)Do you agree with the amendments to current	Strongly agree

Question	Response
<p>Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	
<p>a) Please provide your reasons, particularly if you disagree.</p>	N/A
<p>98)Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	Partly disagree
<p>98a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.</p>	<p>While recognising the importance of proposals for renewable and low carbon energy developments Policy W3 should take a balanced approach to recognising the potential conflicting land uses. For example, the loss of agricultural land required to ensure the national supply of food production and ensure ongoing food security for the UK. Therefore, Policy W3 should consider the need for applications which would result in the permanent or temporary loss of agricultural land to demonstrate how this loss will be mitigated. Where this is not possible the policy should allow for refusal to ensure the future sustainability of the UKs food security.</p>
<p>99)Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	Partly agree
<p>99a) Please provide your reasons, particularly if you disagree.</p>	Clarification is needed regarding policy DM7 regarding duplication of regimes
<p>100) Do you agree with the proposed prohibition on identifying new coal sites</p>	Strongly agree

Question	Response
<p>in policy M1, and to the removal of coal from the list of minerals of national and local importance? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	
<p>100a) Please provide your reasons, particularly if you disagree.</p>	<p>The prohibition on new coal sites is consistent with national climate objectives and the need to transition away from fossil fuel reliance. The council support the moving of the Minerals chapter of the NPPF to a new “delivering homes and supporting growth” which gives more support to the need of the sustainable use of minerals. However, the wider context of Policy M1 is concerning as the 2025 draft removes the long-standing description of minerals as “essential” and downgrades the strategic importance of mineral extraction overall. While the specific prohibition on coal is justified, the weakening of general minerals policy risks undermining the supply of construction minerals.</p>
<p>101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Strongly agree</p>
<p>101a) Please provide your reasons, particularly if you disagree.</p>	<p>The approach to oil and gas is broadly appropriate in discouraging new extraction and ensuring alignment with net-zero commitments.</p>
<p>102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of ‘minerals of national and local importance’? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>102a) Please provide your reasons, particularly if you disagree.</p>	<p>Critical and growth minerals addition is welcomed as these are essential for national economic resilience. Their explicit recognition in the glossary supports clearer plan-making and appropriately elevates their strategic importance. However, adding them to the glossary must be paired with strong policy language. The removal of “essential” and “steady and adequate supply” from the NPPF risks undermining the very minerals the glossary aims to elevate.</p>
<p>103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating</p>	<p>Partly agree</p>

Question	Response
non minerals development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
103a) Please provide your reasons, particularly if you disagree.	Policy M2(b) is proportionate and logically structured safeguarding known mineral resources while still enabling non-minerals development where justified. With the strengthening of the wording from encouraging prior extraction to requiring where practical and feasible supported. However, the downgrading of minerals from “essential” to optional “where appropriate” undermines the weight currently given to mineral safeguarding and risks more minerals being sterilised by competing land uses.
104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
104a) Please provide your reasons, particularly if you disagree.	Policy M3 provides a clear framework for supporting extraction of critical and growth minerals, recognising their strategic role in national economic security and the green transition. The policy reinforces the need for adequate provision while maintaining environmental safeguards and consistency with national decision-making policies. Furthermore, the replacement of “great weight” with “substantial weight,” alongside the standardisation of weighting terminology across the consultation draft, is not considered problematic and may help remove the hierarchy present within the current NPPF. However, it is noted that the draft text no longer refers to minerals as “essential,” a term used in the existing NPPF. This omission is considered to represent an overall downgrading of minerals policy, with the potential to weaken the strategic emphasis placed on ensuring a secure and sustainable supply of minerals, including critical and growth minerals.
105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
106) Please provide your reasons, particularly if you disagree.	Given Policy M3’s focus on critical and growth minerals, excluding onshore oil and gas extraction is appropriate. Oil and gas raise distinct environmental, climate, and regulatory considerations, and it is correct that they are addressed separately under Policy M5 rather than grouped with minerals essential for decarbonisation.
107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? Strongly agree, partly agree, neither agree	Partly agree

Question	Response
nor disagree, partly disagree, strongly disagree.	
108) Please provide your reasons, particularly if you disagree.	Policy M4 deals appropriately with environmental and amenity impacts. However, the context is important and weakened minerals policy wording elsewhere (loss of “essential,” and the absence of wording a “steady and adequate supply”) risks unbalancing decision-making. If the development impacts are strongly articulated but the strategic need for minerals is not, this could lead to refusals or delays.
109) Do you agree with approach to coal, oil and gas in policy M5? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
109a) Please provide your reasons, particularly if you disagree.	Policy M5 reflects a restrictive approach to fossil fuels, allowing only tightly defined exceptions and aligning with national carbon-reduction commitments. The policy provides clarity by distinguishing between legacy operations, decommissioning, and new proposals, while ensuring strong environmental and climate safeguards.
110) Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No	No
111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.	n/a
112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
112a) Please provide your reasons, particularly if you disagree.	Policy M6 provides a proportionate and flexible approach, ensuring mineral safeguarding is maintained while recognising that non-minerals development can proceed where justified. It achieves an appropriate balance by requiring consultation within Minerals Consultation Areas and applying reasonable tests to minimise unnecessary sterilisation. However, the removal of “essential” in the current NPPF risks undermining sterilisation safeguards in practice. If minerals are no longer described as “essential”, and strategic planning only “has regard” to minerals “where appropriate,” safeguarding policies like M6 are likely to become weakened.

Question	Response
113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
113a) Please provide your reasons, particularly if you disagree.	Policy M6 clearly explains the function of Minerals Consultation Areas, including when consultation is required and how minerals safeguarding should influence planning decisions. With the draft NPPF no longer describing minerals as essential and removing obligations for steady and adequate supply, Mineral Consultation Area's may though risk being deprioritised in decision-making.
114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
115) If not, what further guidance is needed?	We support guidance in L1, but are concerned that it is not clear how some of the measures should be undertaken. Also, for a predominately rural area with limited previously developed land that is sustainably located we think that efforts to bring such sites forward should be proportionate. Further guidance needed on how LPs should practically identify opportunities for more efficient land use in predominantly rural authorities. In particular, additional clarity is required on how to interpret L1 in settlements with limited previously developed land, dispersed patterns, and heritage/landscape sensitivities. Guidance should emphasise that efficiency measures must be proportionate and design-led, ensuring character, healthy placemaking, GI and amenity are not compromised when considering intensification opportunities.
116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
116a) Please provide your reasons, particularly if you disagree.	-
117) Do you agree policy L2 identifies appropriate typologies of development to support intensification? Strongly agree, partly	Policy should cover broad principals and be less descriptive

Question	Response
agree, neither agree nor disagree, partly disagree, strongly disagree.	
117a) If not, what typologies should be added or removed and why?	We are concerned about air space and the lack of a definition.
118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
118a) Please provide your reasons, particularly if you disagree.	-
119) Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions. Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
119a) Please provide your reasons, particularly if you disagree.	We would want to see the circumstances where larger buildings are considered appropriate expanded upon with more detail in the National Design Guide, National Model Design Code and/or the Planning Practice Guidance (PPG). There is the need for further national clarity on the circumstances in which larger or more prominent buildings (such as corner buildings or upward extensions) are considered appropriate. This detail is best provided through the new Design & Placemaking PPG, to ensure consistency and support context-sensitive intensification. Clear criteria and illustrative examples would help LPAs apply policy L2(d)(i) consistently across different settlement types, particularly in rural and mixed-character areas.
120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? Strongly agree, partly agree, neither agree	Strongly agree

Question	Response
nor disagree, partly disagree, strongly disagree.	
120a) Please provide your reasons, particularly if you disagree.	-
121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
121a) If not, please explain how guidance could be clearer?	We agree with most of the criteria. However, we have concerns about the requirement for higher density near train stations. In rural areas such as North Yorkshire train stations are often isolated or located away from the main part of the settlement they serve. In such situations it may not be appropriate to require a minimum 40 dwelling per hectare density. We would therefore suggest that such densities are only appropriate if there is also a good range of other services and facilities that people need on a day-to-day basis within reasonable walking distance. In addition, rail proximity alone does not necessarily equate to high levels of connectivity, particularly in a rural authority such as North Yorkshire where stations may be located on the edge of settlements or remote from key services. To achieve good placemaking, higher minimum densities around stations should only be applied where there is both rail access and safe, direct walking routes to everyday facilities. A design-led approach is needed to ensure intensification can be accommodated without harming local character, amenity, green infrastructure or heritage sensitivities. Also we have reservations about the principle of setting density requirements as we think that the appropriate density should be determined through the design process and setting minimum densities potentially undermines that process and could lead to compromised design outcomes.
122) Do you agree with the minimum density requirements set out within policy L3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
122a) Please provide your reasons, particularly if you disagree.	See answer to 121a. Where there is a range of other services and facilities that people need on a day-to-day basis within reasonable walking distance, we think that these densities could be appropriate. However, there should be clear links to the need to improve design quality.
122b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics?	Do not consider that they will lead to adverse impacts

Question	Response
Please provide your reasons, including any evidence	
123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
123a) Please provide your reasons, particularly if you disagree.	Definition of net developable area seems fine. Density could also be set out in terms of floorspace per hectare, which is actually a more accurate measure of how intensively developed a site would be, but is also potentially more constraining in terms of the form development can take. Using dph works well as a minimum-density metric because it is simple, transparent and can align with design coding, while still allowing different built-form typologies. Floorspace per hectare can be useful for understanding intensity, and should be used for non-residential development, but minimum density policy needs to remain flexible enough to support a range of forms - incl. mid-rise, mixed-use, and character-sensitive development. The key is ensuring that whichever metric is used, it still enables good design outcomes, liveability, daylight/sunlight, green infrastructure and active travel.
124) Do you agree with the proposed definition of a 'well-connected' station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we're using for the number of Travel to Work Areas and service frequency appropriate for defining a 'well connected' station? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree

Question	Response
124a) Please provide your reasons and preferred alternatives.	We agree with the principle of enabling development around railway stations, but consider that greater clarity is needed. We consider the use of travel to work areas and service frequency to be suitable measures, but think a nationally published list of qualifying stations is essential. In North Yorkshire several stations are located outside main settlements or lack safe, direct walking access to everyday services. Rail proximity alone does not always equate to high levels of connectivity. Higher minimum densities should therefore only apply where there is demonstrable walkable access to key facilities as well as appropriate rail connectivity, to ensure that intensification supports sustainable movement and healthy placemaking. Setting minimum densities should be carefully considered with regards to the design process to ensure that such minimums do not constrain the design process and lead to poor design outcomes
125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? Yes/No	No
125a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?	N/A
126) Should we define a specific range of residential densities for land around stations classified as 'well-connected'?	No
127) If so, what should that range be, and which locations should it apply to?	N/A
128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly disagree
129) Please provide your reasons, particularly if you disagree.	We agree that what is set out in policy L4 is high-level, but it is not clear and so receives a strongly disagree. The policy lacks sufficient detail as it refers only to the building itself, and not how it relates to other attached or proximal buildings and its impact on the streetscene, or its materials and design features such as fenestration. Also, in terms of its amenity implications, the impacts on the neighbouring properties should also be considered, not just existing and future residents (which could be interpreted as being only in relation to the extended property).

Question	Response
130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree
131) Please provide your reasons, particularly if you disagree.	Agree with the requirements of para 1 and criteria a to c. However, we note that, given the application of policy GB2 (which sets out the purposes of Green Belt land) is limited to existing Green Belts, there appears to be no requirement for new Green Belts to serve Green Belt purposes; we consider such a requirement should be added. As existing NPPF paragraph 142 is not proposed to be retained, we consider that GB1 should include a requirement that new Green Belts are intended to be 'permanent' and therefore should be capable of enduring beyond the plan period. To avoid unnecessary confusion, we consider that the policy should explicitly identify the plans in which new Green Belts could be established.
132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
132a) Please provide your reasons, particularly if you disagree.	N/A
133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly disagree
133a) Please provide your reasons, particularly if you disagree.	We agree with the principle of enabling development around railway stations, including those in the Green Belt where appropriate but disagree with GB3 as currently proposed. We disagree with GB3 in that it appears to require GB boundaries to be altered in all circumstances where doing so would enable development of land around stations, even where development needs could be met on land outside the Green Belt and even where need could be met on non-Green Belt sites with similarly good public transport accessibility as Green Belt land close to a station. We highlight that since GB4 (defining Green Belt boundaries) no longer includes a requirement for new boundaries to be capable of enduring beyond the plan period, GB3 appears to require boundaries to be altered around the same stations each time a local plan is

Question	Response
	reviewed. We consider that Green Belts should retain an element of permanence and, subject to sustainable patterns of development, Green Belt boundaries should only be amended to accommodate development where needs cannot be met sustainably elsewhere. We note the question asks about enabling development around 'suitable stations' but highlight that GB3 omits the word 'suitable'. If this part of the policy is retained we would want to see this only apply to 'well-connected' stations.
134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree
135) Please provide your reasons, particularly if you disagree.	We agree with the intention to increase the public and environmental benefits of Green Belt land. However, we have concerns about the practicalities of implementing these requirements, particularly as they would introduce additional responsibilities for Local Planning Authorities during a shortened plan-making period. Regarding Policy GB5.1(a) on improving public access to greenspace, we suggest referring specifically to "public open space" (POS) within the Green Belt. POS is typically identified and planned for through the local plan process. This would allow LPAs to allocate new or extended POS within the Green Belt where there is an evidenced need (for example, through the Playing Pitch Strategy), rather than needing to address this through planning applications. We are also concerned about the feasibility of improving public access to privately owned greenspace through the local plan. Overall, greater clarity is needed on how LPAs are expected to implement Policy GB5—for example, whether this should be achieved through site allocations, policy wording, or alternative mechanisms.
136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
136a) Please provide your reasons, particularly if you disagree.	We agree that Policy GB6 sets out appropriate tests for considering development on Green Belt land. With regard to Policy GB7, we acknowledge the amendments made in comparison to the existing NPPF. Based on the changes proposed, we consider that they are unlikely to result in a significant shift in the scale, nature, or quantum of development coming forward in the Green Belt. The revised wording is sufficiently precise and should be capable of consistent and effective implementation. Please also see our responses to Question 137 regarding Policy GB7.1.h and Question 145a which identified amendments to GB7.1.g.
137) Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density	Strongly disagree

Question	Response
requirements in chapter 12? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.	We do not consider that GB7, 1h is appropriate or required. GB3, 1a requires Green Belt boundaries near stations to be reviewed to accommodate development when local plans are reviewed. Reviews should not include land in the Green Belt that is not necessary to keep open (GB4, 1a). However, this proposal risks undermining the boundary setting process in these locations by enabling the development of land that contributes to the Green Belt at any time so long as the proposal is for housing or mixed-use development. Where boundaries are set in line with the proposed framework, including with reference to up to date assessment of contributions to purposes, the provisions of GB7, 1h should be unnecessary. Where this has not taken place, the identification of development as appropriate in Green Belt where land is grey belt (and further tests are met) would enable many of these sites to come forward if development needs are not being met without the need for GB7, 1h. If GB7, 1h is retained we consider that 'reasonable walking distance' should be clearly defined. Also, we assume that there should be 'and' at the end of criterion iv, such that all criteria under G7, 1h must be complied with.
139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
139a) Please provide your reasons, particularly if you disagree.	Only in exceptional circumstances where unforeseen circumstances could affect provision of necessary obligations.
140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?	no comment to make
141) Do you agree with setting an affordable housing 'floor' for schemes subject to the Golden Rules accompanied by a	Partly agree

Question	Response
viability assessment subject to the terms set out? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
142) Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?	where circumstances and evidence support the floor and that the affordable housing is located where it is needed and if not then a commuted sum should be made available to provide the affordable housing elsewhere.
143) Do you agree with local planning authorities testing viability at the planmaking stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	neither agree nor disagree
143a) Please explain your answer.	The release of green belt land is subject to the golden rules and should therefore accommodate these. Viability testing at plan-making stage should assess the residual land value and determine whether this is sufficient to incentivise the landowner to release the site. This can be compared to the BLV for standard greenfield and a judgement made on what a reasonable multiplier could be for green belt land. Setting a multiplier often tends to set in stone what the landowner 'should' receive rather than what the landowner 'will' receive once planning obligations are met.
144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?	The release of green belt land is subject to the golden rules and should therefore accommodate these. Viability testing at plan-making stage should assess the residual land value and determine whether this is sufficient to incentivise the landowner to release the site. This can be compared to the BLV for standard greenfield and a judgement made on what a reasonable multiplier could be for green belt land. Setting a multiplier often tends to set in stone what the landowner 'should' receive rather than what the landowner 'will' receive once planning obligations are met.
145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the	Partly agree

Question	Response
<p>general protections given to other footnote 7 areas? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	
<p>145a) Please provide your reasons, particularly if you disagree.</p>	<p>Agree that reference to other “Footnote 7” areas within the grey belt definition is not required to ensure protection for these areas as other policies exist to appropriately protect these assets whether they exist within or outside the Green Belt. Removing the reference will inevitably lead to the identification of more grey belt land as consideration would be solely based on the contribution of land to purposes a, b and d. However, this need not undermine the protection given to these areas so long as it is understood that proposals, whether on grey belt land or not, must meet the relevant policies protecting these areas. While we recognise that proposals are already required to meet all relevant planning policies, we consider that, in order to reduce the potential for wholly unsuitable proposals coming forward on grey belt land that was previously not grey belt due to the former reference to footnote 7 areas in the definition, a requirement for proposals to meet policies relating to these protected areas should be added to policy GB7(1g). We note that the document explaining the proposed changes highlights difficulties of grey belt findings being provisional until specific proposals are considered and identifies that the proposed changes seek to provide greater certainty. We agree that local authority green belt assessments should provide certainty. In this context, we note that the current paragraph of PPG (para 006), which highlights that assessment findings may only be provisional relates to the application of footnote 7 and, therefore expect this to be removed if current proposals are adopted. However, we highlight that, as acknowledged by Annex E paragraph 1a, the scale of assessment areas can have a significant effect on whether grey belt is identified such that, at present, in areas recognised as contributing strongly to purposes a, b or d (i.e. non-grey belt land), very small sites can be defined that, if re-assessed through an application, can be demonstrated to contribute less strongly than the area overall. The re-assessment of such very small sites will be necessary in response to applications in advance of a local authority assessment of the whole Green Belt at appropriate scales, however, once this is completed, continued re-assessment reduces certainty and promotes an incremental undermining of Green Belt purposes. To address this, we consider the grey belt definition should be amended to limit land to that identified through a local plan Green Belt assessment unless that assessment has not yet been prepared or is out-of-date.</p>
<p>146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>146a) Please provide your reasons, particularly if you disagree.</p>	<p>DP1 is clear and well-structured, and we strongly support its role in setting a place-based design vision as part of LP preparation. This could be strengthened by more explicitly requiring spatial and character analysis as part of the plan-making evidence base, to ensure decisions about where design codes, guides, or masterplans are needed are informed by a consistent understanding of settlement structure, walkability, landscape setting and local character. DP1 could also clarify that the strategic design vision should integrate principles of healthy placemaking, walkability and active travel, climate resilience and landscape-led design, so these cross-cutting outcomes shape spatial frameworks from the outset and support alignment between LP policies, design codes and decision-making. While many LPAs undertake this work already, making this expectation explicit in national policy would support greater consistency, particularly in rural and mixed settlement areas where context varies significantly and influences design outcomes. From Public Health: Criteria C should clarify that ...’in response to</p>

Question	Response
	local issues...' this includes local health and wellbeing issues. Paragraph 141 of the current NPPF includes the negative impact of advertisements on quality and character of places. This wording should be retained in Chapter 14: Achieving well designed places so that local planning authorities can include this in their local development plans or take a position on the impact it can have on local communities.
147) Do you agree with the approach to design tools set out in policy DP2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
147a) Please provide your reasons, particularly if you disagree.	The approach is supported. To further strengthen implementation, it would be helpful if DP2 provided firmer policy guidance on when design codes and masterplans are expected. Clearer expectations at policy level would assist local authorities in planning and resourcing design coding activity, avoid inconsistent interpretation, and support early engagement with communities and applicants. This would enable more coherent, locally specific design tools and help ensure codes operate effectively across varied settlement types. From Public Health: Criterion b. could be strengthened to include health evidence as a social component. This would help the development achieve objective C16 Creating Health communities. A Health Impact Assessment could be a valuable tool for achieving this.
148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
148a) Please provide your reasons, particularly if you disagree.	DP3 is clear and comprehensive. To support proportionate and consistent decision-making across different place types, it would be helpful for national policy to recognise the need to balance these principles where they interact (e.g. increased density vs. local character). A short reference to proportionality and balancing would help decision-makers to navigate this whilst retaining the flexibility that DP3 intends. This is particularly important in rural and mixed settlement areas where environmental, heritage, landscape and infrastructure constraints can vary significantly within short distances. From Pubic Health: Criterion specified in policy D3 must ensure that it creates healthy, inclusive and sustainable communities, promotes health equity and reduces health inequalities. In this regard development should not negatively impact public health through poor design and creation of obesogenic environments. Integration of Health Impact Assessments either independent or robustly within design codes and master planning is one way health and wellbeing can be embedded into developments.
149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree

Question	Response
149a) If not, what else would help secure better design and placemaking outcomes?	Not allowing the quality of design to diminish between permission and completion is welcomed. We would suggest that this also extend from Outline permission to Reserved matters. Through the requirement for detailed parameters for materials, layout and landscape treatment for example which would give some comfort and be used to assess reserved matters when they come forward. To further support delivery of high-quality outcomes, the policy could highlight clear triggers for when design review should be used. For example, major or complex schemes, developments in sensitive heritage or landscape contexts, areas of substantial change, or station-area intensification projects. Additionally, DP4 could more explicitly emphasise the importance of retaining design quality through delivery, including through the use of appropriate planning conditions, reserved matters controls, design compliance checks, and iterative review at key milestones. This would help ensure schemes are built as approved, particularly for multi-phase developments or those where value engineering risks diluting design quality. Monitoring design delivery would also support continuous improvement and more effective implementation of local design tools.
150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through planmaking? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
150a) Please provide your reasons, particularly if you disagree.	We are broadly supportive of the approach taken, particularly whereby 'a' prioritises early engagement and alignment with other strategies, and 'b' supports the use of the Connectivity Tool. However, there is an issue of defining 'significant amount of movement'. It would be helpful if more guidance for Local Authorities was available for moving from a predict and provide model to the decide and provide model. TR1 does not really set out what vision led is, nor how the vision would be assessed. 1a) paragraph doesn't quite read right and suggest swapping the clauses to ensure project lifecycle is considered and delivered in appropriate order: currently it starts with the point about ensuring early engagement is done with specific partners/stakeholders (but doesn't consider the internal engagement required within plan-making teams). And thus presupposes 'sustainable transport' will be considered as a priority at this engagement stage or something that comes out of engagement. These two clauses may be in conflict with each other, and this perhaps needs to be flipped: if we consider sustainable transport to be a fundamental part of creating better places, and then engage on that principle: if the vision is sustainable transport (to create well-designed, sustainable, inclusive and popular places) and put that to stakeholders. As the risk of presenting, it the other way round is that stakeholders prioritise non-sustainable modes during early engagement, and we then need to reconcile that to prioritise sustainable transport. Engagement is key, but it has to be done at the right stage, with the right stakeholders, and this doesn't have to be 'everyone, all the time': linking to an engagement plan which gives clear time and space to officers in developing draft visions to begin with (which include the importance of sustainable travel), and then allow these visions to be tested at engagement events, which get wider in scope the further along the plan making lifecycle we progress. 1b) We fully agree with the importance of the Connectivity Tool this and it should perhaps be point 1a if we presuppose site development is founded on sustainable patterns of movement and the Connectivity Tool is the criteria with which we need to meet/satisfy, everything flows from that, and we need to have clear mitigations or measures if we're not in line with Connectivity Tool. Use of Connectivity Tool first, would also assist in later engagement sessions as a fixed source of data/evidence, that supports the notions of 1a & b swapping. 1c) We agree, but it may be useful to introduce densities into this sentiment: large developments with shorter journeys = more urban areas: assign some sort of density test here as per TfL / London Plan re PTAL and density levels respective to PTAL scores. (e.g., if you're a site within CT score A and >X units, density has to be >Y units per ha) Density is considered elsewhere in NPPF but this feels very relevant here. 1d) Yes in principle, but how in practice? More on the 'how' may be useful here in terms of protecting? We can identify them, but protecting a route may be more challenging in practice. 1e) Perhaps more emphasis could be placed here on public transport hubs, and associated infrastructure which enables them (rail, rail lines, bus network/routes etc). 2) 100% agree to ensure TAs don't become

Question	Response
	<p>exercises in beating the system, similar to the density point in 1.c, establishing movement thresholds and potentially even trip budgets by mode by (large) sites would ensure it's written upfront in policy and not diluted at TA level when we get further through lifecycle of development. From Public Health: A vision led approach would support the health and wellbeing of the communities to be served by the development. Stakeholder engagement is key. Public Health must be acknowledged as a specific consultee in this regard. Within paragraph one it recommended that the words "Safe, assessable and affordable" be included.</p>
<p>151) Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>151a) Please provide your reasons, particularly if you disagree.</p>	<p>Yes, agree the balance is good, and considering maximum parking standards (without a minimum) is positive whilst giving enough flexibility. However, to ensure parking standards are appropriate without being flexible enough to be ignored (or having unrealistic maximum standards that reinforce existing uncontrolled standards) TR2/1, should be intrinsically linked to TR1 1c &amp; 2, in terms of setting density and trip thresholds: the parking standards should be aligned to density to ensure we don't over or under provide parking provision, but any vision for lower levels of car parking space as a lever to support more sustainable travel needs to be well considered alongside density. With an area as broad as North Yorkshire having rigid parking standards is an issue we have discussed. The ability to potentially set parking standards for sub regions would be welcomed. Need to be mindful that ways in which people work has changed and cars are often now left at home more, therefore providing sufficient residential parking will need to be considered. The uptake in Electric vehicles (EV) and ability to charge EVs needs to be considered when setting standards. The ability to use census is somewhat helpful, however the use of census data is somewhat limited due to it being old (2011) or not representative due to COVID (2021). Cycle parking should really be considered within this section too: including cycle parking provision with buildings and also on street e.g. cycle hangars etc in higher density residential developments. From Public Health: Paragraph 3 should also include provide safe and accessible infrastructure for bicycles, scooters and skateboards. This would enable accessibility for a wider population.</p>
<p>152) Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? Strongly agree, partly agree, neither agree nor</p>	<p>Strongly agree</p>

Question	Response
disagree, partly disagree, strongly disagree.	
152a) Please provide your reasons, particularly if you disagree.	<p>1a) strongly agree, this feels fundamental to the process of sustainable development; it may be worthwhile giving some examples or thresholds of what we mean by significant amounts of movement though: obviously this will differ vastly from place to place (London vs North Yorkshire), however a % of movement above the existing levels may be useful to highlight? And where these movement levels are shown to be higher than thresholds in terms of percentage uplift/increase, lay out trip budgets at early stage to ensure expectations align with vision for sustainable transport (and how these levels will be met by provision of services - is it bus, rail, cycle etc). 1b) strongly agree. 1c) should this also include carbon emissions alongside localised environmental issues such as air quality? 1d) I'm not sure why rural areas should be treated any differently than a-c? If the increased amount of movement is identified at 1a), then there's no reason to highlight rural areas here. Unless this is a statement about rural development supporting wider sustainable measures in the surrounding areas, rather than within the development itself? If so, this needs to be more explicit and perhaps linked to reasonable measures / distances that can be considered acceptable to improve sustainable transport infra across a rural area. 2) strongly agree with use of Connectivity Tool as per TR1 1B. Only additions would be something along the lines of introducing thresholds for where you'd expect specific developments not to happen depending on their connectivity score. And if there is to be development in lower scoring areas, what type of mitigations are required to ensure we're not developing unconnected places? Currently the connectivity tool does not have the ability to include new routes / paths etc, so if an area is identified as poor on the connectivity tool there isn't a way to evaluate how it could be improved, and if a new cycle route for example was implemented how this would impact the connectivity score of that location. There are many places in North Yorkshire, where the connectivity tool will potentially rate the area as poorly connected due to the rural geography of the county. There will still be a need for other metrics, local knowledge and data sets to be used in assessing proposals. The use of transport models will still be necessary in certain locations and for certain proposals.</p>
153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
153a) Please provide your reasons, particularly if you disagree.	<p>Potential to add something in about developers working together where necessary to deliver continuous footways / cycle paths so that the most direct routes can be achieved? 1a)/b) Strongly support this building on / strengthening the transport hierarchy. However, alongside mentioning certain infrastructure measures such as continuous footways, segregated cycling, lighting etc, it should be stressed that layout comes first and foremost. Developments have to ensure transport hierarchy is prioritised by ensuring pedestrians are most likely to have desire lines accommodated and ensure the most direct routes possible are accessible through developments, linking to services etc. And this directness needs to be designed in within layouts but isn't replicated for private vehicle use. (If we're creating cul-de-sacs, let's ensure there's access for people to move through them and not be forced onto 'road' infrastructure which is circuitous). 1c) it feels appropriate, given this statement introduces the principles of safe, inclusive and attractive, that statement 1a or b, introduces the LTN 1/20 principles of direct and coherent. By tying development plans to core design principles it's easier to vision the life cycle of the development and the design principles the layout has to be founded on (once we've done the Local Plan bit of identifying broadly where sustainable sites are). 2)On these grounds, link to LTN 1/20 core principles should be included alongside Manual for Streets within section 2. From Public Health: Policy TR4 should include reference to creating well-designed, healthy and inclusive places this would better align with the principles of sustainable development</p>

Question	Response
	meeting the social objective. The policy could be strengthened by making in clear the importance of connections to local centres, and amenities.
154) Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
154a) Please provide your reasons, particularly if you disagree.	.
155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
155a) Please provide your reasons, particularly if you disagree.	Guidance on how to prepare and assess vision led transport assessments would be helpful for both developers and the Local Highway Authority. This guidance suggests moving away from the predict and provide model and towards a decide and provide model, with transport assessments covering all modes, different time periods and assessment of different 'reasonable scenarios' which is welcomed. The LHA assumes that where transport assessments / statements are vision led, the vision will be realistic and measurable. Clarity on where developments should be supported by a transport assessments or transport statements should be would also be welcomed. Whilst proportionate, there is a worry that without some guidance, developers will push to provide transport statements which generally contain less technical detail. TR6 (4) makes reference to the consideration of cumulative impacts, whilst some developers already do this, there is room for improvement which could come through the Local Plan process. Identification of developments that would provide a cumulative impact and what infrastructure would be needed to mitigate negative impacts would be helpful, be that the provision of a new bus service, a footbridge over a railway or capacity improvements at a junction, identifying where# these things may be needed early on would generally benefit all parties. Clarification on if applications can be refused on highway grounds, this wording has been removed in the proposed text. From Public Health: With the inclusion of Policy TR1 policy TR6 should include a requirement for travel plans to set out how the development will support the implementation of a modal shift to sustainable and active travel. Changing behaviour is much more than providing infrastructure. If the aspiration within the NPPF is to be achieved support for communities to understand how to make lifestyle changes will be needed.

Question	Response
156) Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
156a) Please provide your reasons, particularly if you disagree.	TR6 (4) makes reference to the consideration of cumulative impacts, whilst some developers already do this, there is room for improvement which could come through the Local Plan process. Identification of developments that would provide a cumulative impact and what infrastructure would be needed to mitigate negative impacts would be helpful, be that the provision of a new bus service, a footbridge over a railway or capacity improvements at a junction, identifying where these things may be needed early on would generally benefit all parties.
157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
157a) Please provide your reasons, particularly if you disagree.	Clarification on if applications can be refused on highway grounds, this wording has been removed in the proposed text.
158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree
158a) Please provide your reasons, particularly if you disagree.	We agree that development plans should set local standards for recreational land. However, we have wider concerns with the policy. Whilst the section in the 2024 NPPF relating to open space and recreation has gone, it now incorporates these uses into the definition of community facilities and policy HC1, which covers both community facilities and public services infrastructure. The aim of the policy to provide, retain and

Question	Response
	<p>enhance appropriate community facilities and public service infrastructure, to promote the creation of healthy and inclusive places is welcomed. The definitions of community facilities and public service infrastructure included in the glossary are welcomed, and the rationale given for the separation between these categories is understood. However, we think libraries fit better with community facilities than public service infrastructure based on the examples given. Our libraries offer meeting place opportunities and involve volunteering opportunities for local communities, both a basis for social cohesion like the wider community facilities definition. Considering libraries holistically as part of community functions would be beneficial. Libraries can be built into multifunctional shared spaces in the context of community facilities and have no guidelines relating to the level of provision required, or space standards needed to meet populations. The Public Service Infrastructure examples given have more defined single purposes such as health care and have more formal national standards and requirements. We agree with HC1, 1d that local plans should set standards, for recreational land drawing upon relevant national standards, and the reference in footnote 58 of the types of national standards and best practice. The importance of relevant service providers and current statutory consultees, including Sport England in contributing to and signing off local evidence, and clarity on the role of Natural England in agreeing how green infrastructure standards should be met, should be further defined or recognised. We support 1a in that recreational land standards should be based on evidence relating to quality, quantity of and future need for such land in an area. However, it is not clear how local health needs and opportunities to reduce inequalities should be accounted for by recreational land, or if there are any national evidence, standards or guidance which could be used to inform this. While 1a requires engagement with service providers and 2 requires engagement with local communities there is no requirement to engage with public health teams or advisory bodies in relation to health benefits and outcomes or inequality reduction strategies. 1d could benefit from more clarity on what is meant by "Connected Network" in relation to play and informal recreation. We understand the wider requirement for connection of different types of blue/green infrastructure into corridors for ecological benefit, but this point suggests play and informal recreational opportunities should also form a "connected network" distinct from green infrastructure requirements. The current approach taken to formal and informal recreational land is that it should relate and be accessible to the community it serves, there is no requirement to link to other similar spaces. Much of our area is rural, with isolated communities, it would be challenging, and of limited benefit, to create recreational spaces between such villages if there is not a specific community to benefit. A definition of "informal recreation" could help. From Public Health: Reducing health inequality is a clear objective within the current NPPF. However, this has been lost within the working draft and is further weakened in the policy detail. Are health needs and inequalities only being considered at the plan and plan policy making stage? How are developers and applicants going to robustly demonstrate how their development is reducing health inequalities and proposing and creating healthy, inclusive and safe places? Requiring a Health Impact Assessment (HIA) for major developments, and other developments identified by the Local Authority, in conjunction with Public Health teams, could help resolve some of this, but the positive and negative outcomes of the assessment need to be given weight too. Policy HC1 should include reference to healthy, inclusive and safe places. The reference to safe has been lost from the current NPPF. Furthermore, part 1 must include acknowledgement that developments must provide essential community and amenity facilities in addition to merely retaining and enhancing existing infrastructure and services. Criterion a, section 1 refers to engagement with relevant stakeholders, at present there is no formal requirement to engage with Public Health teams of the Director of Public Health. Without this local professional knowledge and judgement how can planning teams be assured policies and site proposals within their plans is able to meet the standards of healthy, inclusive and safe places which promote health equity and reduce health inequalities? 1e should include a reference to reducing health inequalities which is outlined in paragraph 96 of the current NPPF. Furthermore, local Joint Strategic Needs Assessments could be utilised to identify opportunities for good health. Part 2 does not include the principles of healthy place making, with too much emphasis being placed on the physical infrastructure and provision of Health care services. The policy needs to make it clear within the policy that health is much more than health care facilities and services and include recognition of the wider determinants of health. Health impact assessments a tool which can be utilised by Planners, developers and others to understand the determinants of health associated with each policy or proposal. Policies and proposals in local plans should be accompanied by a detailed Health Impact Assessment.</p>
159) Do you agree that Local Green Space should be 'close' to the community it serves?	Strongly agree

Question	Response
Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
159a) Please provide your reasons, particularly if you disagree.	<p>In terms of ensuring any land designated as LGS is genuinely local, it is irrelevant whether the current term 'reasonably close proximity' or proposed term 'close proximity' is used in Policy HC2 criterion 1a. The issue is what is meant by 'in close proximity to the community it serves' and it is suggested that a definition is provided within the NPPF. For an area of LGS to be in close proximity to the community it serves and therefore genuinely local, we consider it should be within walking distance of that community, with sites that are entirely isolated from the community not considered appropriate. The NPPF could go further and suggest or require the use of Natural England's Accessible Natural Greenspace Standard is used <a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/AccessibleGreenspaceStandard.aspx">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/AccessibleGreenspaceStandard.aspx</a>. The term 'local in character' in policy HC2 criterion 1c could also benefit from definition in the glossary or clearer guideline in the establishment or assessment of this. From Public Health: Proximity to green space directly impacts accessibility and use. Green space provides opportunities to exercise, socialise, and reduces air and noise pollution. These spaces are essential for promoting mental health, wellbeing, and community cohesion. To ensure that green spaces are accessible to the local communities, development should ensure the provision of benches and resting points and be located close to transport routes, with developers required to improve transport accessibility if necessary. The Policy could include use of Natural England Greenspace Standards to support the application and implementation of this policy.</p>
160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly Disagree
160a) Please provide your reasons, particularly if you disagree.	<p>A decision-making policy on the issues of Community Facilities and Public Service Infrastructure is a positive step in the provision of these types of uses and policy HC3 Criterion 3 on requirements for conditions and obligations in relation to delivery is particularly supported. However, the overall approach presented lacks detail which makes the policy less likely to be effective or requiring additional local policies to be developed which involve the setting of standards. Policy HC3 contains a number of ambiguous elements. Firstly how "significant numbers" of additional people might be defined - should this be related to major and minor development types or defined separately in the glossary - is it context dependent in relation to the authority or type of settlement being expanded - should the Local Authority set this threshold/trigger, or can the applicant make the distinction? If the LA needs to set the threshold, this should be included in the plan making policies or associated guidance for those. In relation to HC3 1a, where local standards have been set for the provision of community facilities or public services, must these be followed by the applicant (setting of such standards should therefore also be highlighted in HC1 plan making policies or it should be made explicit which providers or authorities will set such requirements), or can the applicant set their own view of what is reasonable. Where no local standards are set, would the applicant or planning officer be required to engage with the relevant public service body or providers? Would they also need to consult the communities served? Would they need to consider qualitative deficiencies as well as quantitative and consider local health needs similar to the plan making requirements? If based on applicant assessments, how would agreement be reached as to if needs have been met? What is the procedure is service provider organisations do not respond? As no national guidelines or standards are available relating to acceptable levels of provision of community facilities or public service infrastructure, this policy is less likely to be implemented in a way that delivers change. Policy HC4 Criterion 2 is ambiguous in the term "where appropriate" if</p>

Question	Response
	<p>this relates only to proposals for improved play this should be made explicit, or it should be made clearer in the policy or through guidance where it would not be appropriate. From Public Health: The policy is currently unclear. Any development is likely to increase the numbers of additional people in an area. The needs arising from these different scales of development should no less be ignored. How is 'significant' being defined? Regardless each development must be responsible for the provision of infrastructure. Small development could be best captured through developer contributions that are pooled for that area whereas larger scale developments should be required to deliver on site improvements where possible. Policy HC4 would require Local planning authorities, developers and public service providers to collaborate prior to an application being submitted. Public Health should be consulted to ensure that the proposal positively contributes to the health and wellbeing of the community.</p>
<p>161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term 'fast food outlets', and the types of uses to which it applies?</p>	<p>A definition of "Fast Food Outlets" in the glossary would be helpful to avoid ambiguity. As mentioned in other responses the term "reasonable walking distance" is not clear and should be defined. The term "Designated Town Centre" also has no definition in the glossary. Does this relate to centres defined by the Local Plan, or any Local Authority evidence. Where such documents do not designate formal boundaries for town centres can a local judgement be made? Does the same apply to designated "out of town retail centres", neighbourhood hubs or smaller centres? From Public Health: Policy HC4 could include a clear definition of what is defined as 'fast-food outlets. A definition consistent with the Department of Health and Social Care methodology used for the Wider Determinants of Health profile, specifically the indicator Fast food outlets per 100,000 population (ID 94124, last updated 04 February 2025), which provides a coherent classification of fast-food outlets. Establishing this as the basis for planning assessments would remove ambiguity and support more effective, evidence-led decision-making. 800m is now a widely accepted definition of a walkable distance and has been used by DfT in their Manual for Streets in 2007, CIHT in their 2015 Planning for Walking guidance, TCPA in their 20-minute neighbourhoods, and Sustrans in their Walkable Neighbourhoods guidance. Local Planning authorities should retain flexibility to set their own requirement within the local context of plans.</p>
<p>162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly Disagree</p>

Question	Response
<p>162a) Please provide your reasons, particularly if you disagree.</p>	<p>It is positive to have an approach that seeks to retain community facilities and public service infrastructure as a national template. However policy HC6 as it stands is ambiguous.</p> <p>In Policy HC6 criterion 1, the term "local area" is helpful if attributed to a village, but relating it to a larger town (or a subsection of) where a larger population is served, it does not take account of accessibility or capacity - if local area can be related to walking distance or local identified standards in relation to plan making evidence this should be made clearer.</p> <p>The term "key community facilities and public services" requires further clarity. The definition provided in policy HC6 part 2, lists a selection of community facilities which overlaps partly but not entirely with the glossary definition for these, and does not list any public service infrastructure from the glossary definition. The policy therefore does not intend to cover doctors, libraries, or open spaces. If this is the intention, the reference to public service infrastructure should be removed from the policy, and an explicit definition of "Key Community Facilities" added to the glossary, including if this only relates to those which are the last of their type in the local area.</p> <p>The clarity on viability evidence of a year in policy HC6 criterion 1a is welcomed.</p> <p>There is however less clarity as to the assessment of "insufficient community support". Criterion 2 references "established" facilities and those with "frequent use", this implies a method of assessment rather than a definition, but no qualifying standards are presented as to how such parameters could be assessed. Assessing services based on how established or frequently used they are conflicts with the need to provide new services under proposed policies HC3 and HC4. We would argue that if a service is "established" or not is irrelevant, the question is if it is needed or offers the best location for that use. An existing community facility could be considered for appropriate provision of an alternative community use in the first instance before it is lost, given the biggest barrier to provision of a service is the land or building itself. This would better allow the community to meet changing needs through time and would better support the "Pride in Place" agenda. There is benefit in a facility identified for removal being advertised to a local community for alternative uses, or for adoption as an "Asset of Community Value", prior to being disposed of. Guidelines around this would be welcomed.</p> <p>In Policy HC6 Criterion 1b, the term improved accessibility can be ambiguous as to if this relates to the travelled distance for the community it serves or requirements for disabled or equality access to a building or facility.</p> <p>In conclusion, we would suggest ALL community facilities should be assessed (all be it with a stronger emphasis on those which qualify as the last of their type if necessary) as the last facility of its type remaining might not have been the best location for this - opening up wider dialogue as each facility is considered for removal offers better opportunities for the communities. Identifying key community facilities, the communities they serve and needs to be met through available infrastructure should be aligned to plan making evidence on standards, capacity, quality and accessibility for community facilities and the addressing of inequalities and health and wellbeing strategies I the first instance. As such we would suggest the term "key" be removed from the policy title and the definition of "last of its type" be added to criterion 1 as qualifying information where relevant and either greater detail provided to the policy or greater flexibility for local authorities to add include their own standards.</p>
<p>163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of 'and/or' with reference to quantity and quality of replacement provision? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>

Question	Response
163a) Please provide your reasons, particularly if you disagree.	No Significant change just greater flexibility to focus on quality and function of open space. From Public Health: We welcome the widening of the definition to include informal play space and allotments, which are an important part of local community infrastructure. The provision of increased quantity should not be at the detriment of high quality.
164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
164a) Please provide your reasons, particularly if you disagree.	Local Green Space has different requirements and criteria than Green Belt alone and therefore should be assessed in line with the purpose it serves for the community which is entirely separate from Green Belt considerations. From Public Health: The Policy is unclear at present. Local Green Space is different to Green Belt, and it would be appropriate for it to be assessed for its intended purpose and not be confused with Green Belt.
165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
165a) Please provide your reasons, particularly if you disagree.	NA
166) Are any additional tools or guidance needed to enable better decision making on contaminated land?	Yes, around the longer-term management of sites and the prescribed detail needed to establish compliance with P2 in terms of the specification of assessments and define 'competent person'.
167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution? Strongly agree, partly agree, neither agree nor disagree, partly	Partly agree

Question	Response
disagree, strongly disagree.	
167a) Please provide your reasons, particularly if you disagree.	<p>We welcome the revised policy, which is comprehensive and prescriptive in covering a full range of pollution-related considerations relevant to planning decisions - air, noise, light, water, soil, and cumulative impacts. It explicitly cites the need to address both the effect of the development on its surroundings and the suitability of the site for its future occupiers. Moreover, it integrates national standards, local action plans, site sensitivity, vulnerability of users, and the protection of valued environments such as dark landscapes, tranquil areas, and chalk streams. This ensures a complete and robust framework for assessing environmental impacts in development proposals. Specifically, P3.3. "In applying this policy, it should not be assumed that other regimes for the control of pollution will necessarily eliminate emissions completely". this appears to revert the burden of proof back to the planning system. It should be clarified that the decision maker applies the principle that any emissions still released under a permitting arrangements are acceptable. And, that the permit should be granted prior to the submission of the application.</p>
168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
168a) Please provide your reasons, particularly if you disagree.	<p>Partly Agree - The strengthened and clarified approach to Agent of Change now set out in Policy P4 is welcomed. This policy provides detail on the expectations for managing the interface between new and existing land uses. The revised wording presents an improved policy with regard to the established Agent of Change principle, but builds on this to make it unequivocally clear that in planning terms, the party introducing a new land use is responsible for identifying, managing, and mitigating any resulting impacts. Importantly, the policy confirms that existing businesses, cultural venues, pubs, community facilities, public services, and defence or security activities should not face unreasonable operational restrictions due to the introduction of new sensitive development nearby. This improved clarity will help both identify earlier, and prevent avoidable conflict, reduce the likelihood of complaints, and ensure that long-established noise-generating uses, including (but not limited to) agricultural operations, places of worship, pubs, and rural enterprises will not be unfairly disadvantaged by incompatible neighbouring new development. It is however noted, that what is considered unreasonable, would benefit from a clearer definition and articulation of what would, or should be considered "unreasonable" in terms of a restriction. A clearer definition of what constitutes "unreasonable restriction/s" would perhaps further help ensure a degree of consistent interpretation and application. In clearly defining responsibilities, the policy removes some previous ambiguity for developers, local authorities, and communities. It will better enable Development Management to require applicants to demonstrate appropriate mitigation - such as enhanced acoustic design, effective site layout, buffer zones, and operational measures, from the outset of the design process and early dialogue. This early dialogue and consideration where the Agent of Change principal is activated, could be further assisted with assessment requirements set out within the Information Requirements at Annex C. In the first instance, the strengthened wording reinforces the Agent of Change principle in a way that supports growth and regeneration without undermining valued economic, cultural, or community activities. While we welcome this refined approach, it is imperative that this progress is mirrored by clarity and consistency in enforcement, licensing and building control.</p>
169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development	Strongly agree

Question	Response
proposals? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
169a) Please provide your reasons, particularly if you disagree.	Strongly Agree – P5 provides a robust basis for addressing potential malicious threats and other hazards and requirements for proportionate mitigation. The policy sets clear expectations for assessing risk, key consultees encouraging proportionate mitigation measures, and ensuring that safety and security considerations are embedded within the planning process. Clarification in the application towards vulnerable groups is welcome. Its scope allows for collaboration with relevant authorities and specialists, ensuring that developments are both resilient, sustainable and safe.
170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
170a) Please provide your reasons, particularly if you disagree.	Perhaps with the clarification - "If it is judged to be in the interests of national security". Proposals could have an adverse impact on features, assets of demonstrable national significance and there needs to be a means to assess that harm vs benefits balance to that proposal.
171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
171a) Please provide your reasons, particularly if you disagree.	There is more emphasis on CCMA's/local authorities to lead as a means to control appropriate types of development for these areas. Subsequently, more certainty as to what would be required by the policy.
172) Do you agree with the proposed clarifications to the sequential test set out in policy F5? Strongly agree, partly agree, neither agree nor disagree, partly	Agree

Question	Response
disagree, strongly disagree.	
172a) Please provide your reasons, particularly if you disagree.	N/A
173) Do you agree with the proposed approach to the exception test set out in policy F6? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Agree
173a) Please provide your reasons, particularly if you disagree.	N/A
174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
174a) Please provide your reasons, particularly if you disagree.	This is considered the most up-to-date legislation to be used alongside and to inform NYC standards.
175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree

Question	Response
175a) Please provide your reasons, particularly if you disagree.	Compared with an open channel there is an increased risk of blockage from culverted watercourses. If the blockage occurs within the culvert, there is much greater difficulty in removing it. Culverts conceal the presence of a watercourse and can lead to development or unacceptable land use above or near them. In many urban areas buildings have been constructed above or adjacent to culverts. This means that improving standards of flood protection or accommodating run-off from future developments could be impossible or uneconomic due to the cost of replacing or enlarging existing culverts. Biodiversity Net Gain (BNG) framework strongly discourages culverting of watercourses and treats it as a significant biodiversity loss that should normally be avoided. Where culverting cannot be avoided, it is heavily penalised in the BNG watercourse metric, and developers are expected to compensate accordingly. It conflicts with the hierarchy because culverting removes in-channel and riparian habitat, breaks ecological connectivity along rivers and streams, acts as a barrier to fish and invertebrate movement and reduces natural river processes.
176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
a) Please provide your reasons, particularly if you disagree.	The changes adopt a more consistent approach that would align with other government departments/organisations to manage coastal change and erosion. Also, there is account for areas identified as vulnerable within the NCERM that do not fall within a CCMA. A CCMA will enable the LA to plan effectively and respond to shoreline changes pragmatically in line with localised circumstances.
177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?	A risk-based approach is likely to be adopted following a review of the NCERM erosion data to establish which assets are at current and future risk to then consider applicability or the need for a CCMA. Any prospective CCMA sites would need site specific consideration of erosion rates and apply a 'best fit' climate change scenario based on local knowledge. The Environment Agency confirm NCERM is their best estimate at a national scale, however due to the complexity of the coast there are uncertainties involved in creating erosion projections that increase over time. NCERM is a useful tool to identify areas vulnerable to coastal change and assets at risk but shouldn't be relied upon to define the extent of CCMA's.
178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
178a) Should any other forms of development	N/A

Question	Response
<p>should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.</p>	
<p>179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>179a) Please provide your reasons, particularly if you disagree.</p>	<p>The phrase “avoiding and minimising harm to designated sites of importance for nature” still allows for harm to some of our most important sites. It would be better to state “avoiding harm”. The phrase “Areas which could become of particular importance for nature identified in Local nature Recovery Strategies should be taken into account” should be made stronger replacing ‘should’ with ‘shall’ if The LNRS are to deliver their intended goals. This implies a need to understand geological and soil resources, which is a specialism many LPAs are unlikely to have.</p>
<p>180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?</p>	<p>Where this could be applied to sites which would likely result in greater recreational pressure on designated sites. This additional BNG requirement could be used for buffering sensitive sites. Where this could contribute to opportunities to connect to and strengthen ecological networks that extend beyond the site. The type of allocations where more than 10% might be worth considering include very urban sites, where the baseline is so low that trifling measures can meet the 10% BNG uplift. This might for instance be old airfields, quarries, car parks, unvegetated brownfield sites or urban re-dev where buildings are demolished.</p>
<p>181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing</p>	<p>Partly agree</p>

Question	Response
<p>natural characteristics of sites proposed for development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	
<p>181a) Please provide your reasons, particularly if you disagree.</p>	<p>There is no detail on what incorporating integrated nest boxes means, does this apply to only one house or a certain percentage of houses built? Why not extend the integrated box requirement to other bird species, such as house sparrows, and other species such as bats? - There will be lots of places where swift boxes are inappropriate, buildings with eaves/rooflines less than 5 metres above ground level, buildings where North to East facing aspects are not suitable. Nest boxes can be ecological traps, i.e. they can cause more harm than good. For example, over-heating is an increasing threat to cavity/ledge nesting species in southern Europe. There needs to be some kind of wording to ensure that Swift bricks are appropriately located, or a reference/link to guidance. The emphasis on multiple uses of GI means additional caution must be applied in setting target condition for BNG: if a BNG area is also going to be used for recreation, it is unlikely to reach good condition for ONG, for example.</p>
<p>182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>182a) Please provide your reasons, including how policy can be improved to ensure compliance.</p>	<p>There is no reference to National Landscapes as a 'protected landscape'. Is this in error? The reference should be restored to sit alongside National Parks and the Broads. Provision of a definition of the word 'setting' in section N4:4.</p>
<p>183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>

Question	Response
183a) Please provide your reasons, particularly if you disagree.	The new text no longer includes “development whose primary objective is to conserve or enhance biodiversity should be supported” which may have a detrimental impact on the work of conservation organisations and make the establishment of habitat banks more difficult. It would be helpful if the section on irreplaceable habitat, or the glossary definition, cross referenced The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 to ensure the definitions were linked. N6-1a(ii): The principle of allowing damage to European sites to be offset via EDP fundamentally undermines the Habitats Directive. It allows even our most highly protected sites to be damaged if the developer pays to do so. There should, at the very least, be some constraint on this, e.g. only applies to developments of national importance. N6-1b(iii): This implies that an EDP is only required to take account of damage to the features for which a SSSI is designated (i.e. those referred to in the citation), not the integrity of the site. The danger of this is that most SSSI citations are old, some are out of date and inaccurate, and there’s no process for reviewing them short of re-designating sites (which happens very rarely).
184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?	Making the creation of ponds for the purposes of conservation easier within the planning system - Policy N5 – it is unclear whether this policy is sufficient to protect the character of sensitive coastlines that are under pressure from the extension of caravan parks. Policy N5 – It is unclear whether this policy would restrict major developments such as coastal defence schemes . Policy N5 – more detail would be appreciated in relation to the phrase “compatible with the special character”. Does this go beyond the appearance and design of buildings to include biodiversity features?
185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
a) Please provide your reasons.	The inclusion of assets beyond listed buildings and conservation areas is welcomed. This strengthens the protection of the assets and provides a consistent basis for conserving and enhancing different types of heritage assets.
186) Do you have any evidence as to the impact of implementing the additional regard duties for development?	No comment
187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? Strongly agree, partly agree, neither agree nor	Partly agree

Question	Response
disagree, partly disagree, strongly disagree.	
187a) Please provide your reasons, particularly if you disagree.	Policy HE1 provides a strong degree of comparability to the current NPPF but with an emphasis on growth. This may help to promote the historic environment and its wider benefits to sustainable development such as tourism, the economy, housing growth etc. Further guidance is required with regards to what form the positive strategy would look like (is this within policy or Supplementary Plans?) HE2 - to improve this policy it would be beneficial to include the full range of heritage assets. To some degree it repeats policy HE1 but omits other heritage features. HE3 is largely similar to the current NPPF, no issues raised.
188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
188a) Please provide your reasons, particularly if you disagree.	HE5 part 5 considers the information requirements regarding the impact of proposals on heritage assets of archaeological interest. The requirement to carry out a desk-based assessment has been carried forward from the current NPPF text. However, it is normally the case that these desk-based assessments tell us very little that we did not already know, and developers are spending a disproportionate amount of time and money in preparing unnecessary documents when this resource could better focussed in preparing a field evaluation such as a geophysical survey or trial trenching that will properly reveal the significance of any archaeological assets. Developers are over reliant on desk-based assessments to progress their proposals and applications are frequently delayed as the desk-based assessment has been insufficient to properly reveal the archaeological significance. The irony is that most, well-produced, desk-based assessments will recommend that a field evaluation needs to takes place but this advice is not taken up (Peter Rowe).
189) Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
189a) Please provide your reasons, particularly if you disagree.	The terminology has been made clearer and more consistent. Dropping less than substantial harm and replacing with harm is welcomed for simplicity but further support and guidance is required to determine the variation and levels of harm which is often discussed in appeals.
190) Do you agree with the new policies in relation to world heritage,	Partly agree

Question	Response
<p>conservation areas and archaeological assets in policies HE8 – HE10? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	
<p>190a) Please provide your reasons, particularly if you disagree.</p>	<p>HE7 considers the impact of proposals on non-designated heritage assets. The term non-designated heritage asset is not given a glossary definition in the document, and this should be a requirement. It is not clear from this policy if the term applies in a 'plain English' meaning, i.e. any heritage asset that is not designated, or if it applies only to assets that have been specifically identified by a plan making body such as a local list building. HE10: Archaeological assets. The policy does not really explain at what stage 'an appropriate investigation' should take place, but it is presumed that this would be an information requirement at the application stage in which case the additional details in part 1 of this policy would be better placed in HE5 part 5. HE10 part 2 states that 'Archaeological assets should be preserved in situ' without any discussion of their significance. This first sentence might be qualified with wording such as 'Archaeological assets should be preserved in situ where this is justified by their significance'. Part 2 of this policy also seems to repeat HE11 part 1b .</p>
<p>191) Do you have any other comments on the revisions to the heritage chapter?</p>	<p>Separating out archaeology (i.e. Policy HE10) from other heritage matters seems to be a step backwards to the old division between PPG 15 (built heritage) and PPG16 (below ground heritage). A more unified and holistic approach to the historic environment is preferable. It would be desirable to see a greater emphasis on public benefit in relation to archaeological preservation and recording (policies HE10 and HE11). Archaeological recording of heritage assets prior to development, such as an archaeological excavation, can provide opportunities for public engagement, social cohesion and wellbeing but these opportunities are rarely taken up by developers despite the willingness of most archaeological units to provide these benefits.</p>
<p>192) Do you agree with the transitional arrangements approach to decision making? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	<p>Partly agree</p>
<p>192a) Please provide your reasons, particularly if you disagree.</p>	<p>Further clarification would be beneficial</p>
<p>193) Do you have any further thoughts on the policies outlined in this consultation?</p>	<p>We hope that many of the concerns and questions we have raised in responses can be addressed in the published version of the NPPF. However, we would strongly urge government to publish updated planning practice guidance (PPG) promptly after the new NPPF. Updating the PPG following revisions to the NPPF have often taken long periods. Given the significance of the proposed changes we think it is essential to have updated PPG immediately following publication of the revised NPPF.</p>
<p>194) Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this</p>	<p>Strongly agree</p>

Question	Response
consultation? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
194a) Please provide your reasons, particularly if you disagree.	We would support the principle of identifying written ministerial statements that will be superseded and would note that the list looks suitably comprehensive.
195) Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	neither agree nor disagree
195a) Please give reasons.	At this stage we have no firm views on this but will welcome more detailed consultation through the proposed new National Policy Statement on data centres.
196) Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? Yes/No	Yes
196a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.	N/A
197) Do you have any views on how we should define 'co-located energy infrastructure'? Please provide your reasons.	sufficient proximity to allow connection to provide the data centre with power and/or export surplus energy

Question	Response
198) Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres? Yes/No	Limited to those co-located with data centres
198a) Please provide your reasons.	Limited to those co-located with data centres
199) What benefits or risks do you foresee from making this change? Please provide your reasons.	swifter delivery of data infrastructure
200) Would you support the use of growth testing for strategic, multi-phase schemes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
200a) Please explain your answer.	Periodic reviews of development assumptions could mitigate issues arising from changing costs such as sites stalling as a result of renegotiation of contributions.
201) Would you support the optional use of growth testing for regeneration schemes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
201a) Please explain your answer.	Periodic reviews of development assumptions could mitigate issues arising from changing costs such as sites stalling as a result of renegotiation of contributions. Optional review could provide greater flexibility to mitigate issues.
202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve	Partly agree

Question	Response
<p>speed and certainty? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</p>	
<p>202a) Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market-led development.</p>	<p>Would question whether there is a guarantee of speed and certainty. However, specificity may set a useful benchmark</p>
<p>203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?</p>	<p>Profit should be reflective of risk and therefore schemes which contain elements of low risk such as affordable housing to be sold to an RP should not require as high a profit margin.</p>
<p>203a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.</p>	<p>Setting 6% of GDV for affordable housing would increase transparency however it should apply to all affordable tenures and not just rent. Through experience there is little difference in risk to owning or renting - often ownership route sales are faster than market equivalents.</p>
<p>204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed,</p>	<p>by establishing a minimum profit level for a range of development types</p>

Question	Response
reducing the need for subjective expectations?	
204a) Please explain your answer.	Setting a minimum which provides sufficient incentive to release land will create a baseline.
205) Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?	No comment
206) Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	neither agree nor disagree
206a) Please explain your answer.	Not convinced this would provide more housing or speed up delivery. Alternative metrics to assess for example the term of years over which investment will be recovered through rental income can assist to determine risk and be capitalised and discounted back to factor into an overall % return on GDV. % return on GDV is transparent and simple and allows the LPA to formulate a judgement without considering other complex metrics separately.
207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?	Schemes which involve long term income streams rather than straightforward sales.
207a) Please explain your answer.	Schemes which involve long term income streams rather than straightforward sales.

Question	Response
208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
208a) In what circumstances might a premium, or the usual premium, not be required?	Where land carries the burden with 'abnormal' issues such as contamination and would not be viable to develop with policy obligations. Land owned by public bodies where delivering 'social value' should outweigh maximising profit.
208b) What impact (if any) would you foresee if this change were made?	May disincentivise release of land.
209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly agree
209a) Please explain your answer.	extant consent does not equate to deliverable and may inflate the value of land where the scheme is unviable to implement. An extant consent could be viability tested to determine an appropriate value however an implication of this route could delay delivery of an alternative proposal.
210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? Decision maker discretion / Another metric / Neither	Decision maker discretion supported by strong national policy setting out that extant consents should not determine AUV.

Question	Response
210a) If another metric, please set out your preferred approach and rationale.	N/A
211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?	The WPVA should incorporate a range of theoretical BLVs which are cross checked against market evidence and tested against policy requirements on an unencumbered site.
212) Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context. Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
212a) Please explain your answer.	It should be cross checked but in the absence of similar schemes professional judgement will be required to ensure the comparison is made 'like for like'. However, an implication of this approach is the threat of protracted debate between the LPA and developer which may slow delivery of the proposed scheme.
213) Do you agree that a 2.5 hectare threshold is appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly agree
213a) Please provide your reasons, particularly if you disagree.	Would agree with the responses to the working paper that 1ha is too restrictive. However, 2.5ha seems too large. We therefore suggest 2ha as a threshold
214) Do you agree that a unit threshold of between 10 and 49 units is appropriate? Strongly	Strongly agree

Question	Response
agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	
a) Please provide your reasons, particularly if you disagree.	-
215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development? Yes/No.	No
216) If so, please explain your answer and provide views on potential mitigations.	N/A
217) Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purposebuilt student accommodation?	N/A
217a) Please provide your reasons.	N/A
218) If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?	We would agree with 120 bedspaces being an appropriate equivalent
218a) Please provide your reasons.	.

Question	Response
219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.	We have no views on this question
220) If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.	We have no views on this question
221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.	We have no views on this question
222) Do you agree with the proposal to extend the Permission in Principle application route to medium development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Strongly Disagree
222a) Please provide your reasons, particularly if you disagree.	Because it would circumvent the necessary requirements for the level of development coming forward, i.e. infrastructure, affordable housing
223) Do you have views about whether there should be changes to the	Please see question 222a

Question	Response
regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?	
224) 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?	<p>The consideration of the above policies has raised potential positive, neutral and negative implications for those with protected characteristics living / working / visiting North Yorkshire. It is considered that the proposed NPPF polices provide opportunities to benefit multiple populations with protected characteristics through their application. E.g. It is considered that Policy HO7 could positively affect various populations with protected characteristics (age, disability), Policy PM1 could positively affect all/any protected characteristics by identifying housing needs in Spatial Development Strategies and meeting those needs in Local Plans, and Policy PM13 could positively impact everyone, but particularly those who would benefit from increased standards in housing such as older people, those with disabilities, those on low incomes and those in rural areas. But for other policies, this opportunity has a locational factor e.g. it is dependent on whether such populations are located close to where existing or new community facilities, public service infrastructure, formal and in formal open space, or local green space exists or is designated. (Policies HC1, HC2, HC3, HC4, HC7, HC8) However, there are some instances where it is considered the NPPF policies potentially could impact negatively on those with protected characteristics, especially with respect to engagement and involvement as well as to those with respect to specific protected characteristics. Examples of these are set out in the response to Q224a. The ability to judge and measure impact on communities or individuals with protected characteristics requires access to population distribution information for these. Standards on how inequalities in populations with protected characteristics could be addressed by these designations would help achieve better outcomes in this respect if they were made available. From Public Health: The built and natural environment is a key environmental determinant of health and wellbeing. An ever-increasing body of research indicates that the environment in which we live is inextricably linked to our health across the life course. (Spatial Planning for Health: an evidence resource for planning and designing healthier places <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729727/spatial_planning_for_health.pdf</a>) "The health of our community is like a building, it depends on a strong and stable foundation. Things like quality education, safe and affordable housing, access to healthcare, and employment opportunities, structure positive health outcomes for everyone in important ways. As public health professionals, it's our mission to build thriving communities, so we work closely with many other sectors to assemble a solid foundation that supports long-lasting good health for us all." Source: The Health Foundation FRAJ7032-Public-Health-Reaching-Across-Sectors-FINAL.pdf <a href="https://www.frameworksinstitute.org/app/uploads/2020/06/FRAJ7032-Public-Health-Reaching-Across-Sectors-FINAL.pdf">https://www.frameworksinstitute.org/app/uploads/2020/06/FRAJ7032-Public-Health-Reaching-Across-Sectors-FINAL.pdf</a></p>
224a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.	<p>Specific potential negative implications are noted for: Race: Policies HO2, HO3. It is inappropriate to use the term travellers to cover both Gypsy and Travellers and Travelling Showpeople as they are two very distinct groups with different cultures and housing needs. There is inconsistency throughout the NPPF with the terminology used. All references to travellers should be removed and replaced with Gypsies and Travellers and/or Travelling Showpeople. Policy HO12. As shown in the comments for Q79, this policy presents a bigger test for Gypsies and Travellers to have to navigate to achieve permission than those seeking open market development which creates an inequality issue. People with protected characteristics may be affected by the preparation and examination of Local Plans and Minerals and Waste Local Plans and the need to carry out consultation/engagement with all groups within the new preparation timescales. The Plan period &amp; development proposed in a Local Plan and the general principles for plan making could affect all or any persons with protected characteristics. (Policies PM2, PM6, PM7, PM15. PM17) or are relevant to specific groups e.g. Age: There are opportunities to benefit multiple populations with protected characteristics through applying Policy HC5 as it is targeted at improving health outcomes. It is however specifically targeted at improving health outcomes for those under 18 in terms of reducing access to unhealthy fast-food choices where possible. People on low incomes may be negatively impacted by policy HO8 for the reasons set out in our responses to questions 63-71. However, the provision of further guidance could help to alleviate negative impacts. Similarly, People from the armed forces may be impacted negatively by the policy change in Policy HO8 relating to how housing for military personnel is provided. This will impact on the provision of military housing but may also have wider implications for the provision of affordable housing/meeting Affordable Housing need generally and may impact the amount of social rent housing delivered. Local policies have generally already included the affordable provisions, linked to the HEDNA and other local</p>

Question	Response
	data sources or other locational issues. The inclusion of clauses within National Policy may reduce/impact on the ability to take account of these factors locally. People in Rural areas may be impacted by Policy S2 as the definition is most likely to affect those in our rural communities such as hamlets or scattered farmsteads. This is dependent on other policies within the NPPF.
225) Is there anything that could be done to mitigate any impact identified?	It is expected that MHCLG will consider and amend the policies as necessary in light of the above comments regarding equality matters and proposed mitigation identified. It is also expected that MHCLG will undertake its own Equality Screening Assessment of these proposed policies to determine whether a full Equality Impact Assessment of the NPPF is necessary and whether an action plan needs to be developed to ensure that the general duties of the PSED are met. It is also expected that MHCLG will monitor the implementation of the policies

## Initial Climate Change Impact Assessment (Form created August 2021)

The intention of this document is to help the council to gain an initial understanding of the impact of a project or decision on the environment. This document should be completed in consultation with the supporting guidance. Dependent on this initial assessment you may need to go on to complete a full Climate Change Impact Assessment. The final document will be published as part of the decision-making process.

If you have any additional queries, which are not covered by the guidance please email [climatechange@northyorks.gov.uk](mailto:climatechange@northyorks.gov.uk)

<b>Title of proposal</b>	<b>Council response on draft NPPF consultation</b>
<b>Brief description of proposal</b>	There is a national consultation on a new draft NPPF. As part of the consultation a set of questions has been set. Officers across the council have written responses to the questions. The report seeks executive member sign-off for submission of these responses.
<b>Directorate</b>	<b>Community Development</b>
<b>Service area</b>	<b>Planning Policy and Place</b>
<b>Lead officer</b>	<b>James Campbell</b>
<b>Names and roles of other people involved in carrying out the impact assessment</b>	

The chart below contains the main environmental factors to consider in your initial assessment – choose the appropriate option from the drop-down list for each one.

Remember to think about the following;

- Travel
- Construction
- Data storage
- Use of buildings
- Change of land use
- Opportunities for recycling and reuse

<b>Environmental factor to consider</b>	<b>For the council</b>	<b>For the county</b>	<b>Overall</b>
Greenhouse gas emissions	No effect on emissions	No Effect on emissions	No effect on emissions
Waste	No effect on waste	No effect on waste	No effect on waste
Water use	No effect on water usage	No effect on water usage	No effect on water usage
Pollution (air, land, water, noise, light)	No effect on pollution	No effect on pollution	No effect on pollution
Resilience to adverse weather/climate events (flooding, drought etc)	No effect on resilience	No effect on resilience	No effect on resilience
Ecological effects (biodiversity, loss of habitat etc)	No effect on ecology	No effect on ecology	No effect on ecology
Heritage and landscape	No effect on heritage and landscape	No effect on heritage and landscape	No effect on heritage and landscape

If any of these factors are likely to result in a negative or positive environmental impact then a full climate change impact assessment will be required. It is important that we capture information about both positive and negative impacts to aid the council in calculating its carbon footprint and environmental impact.

<b>Decision (Please tick one option)</b>	Full CCIA not relevant or proportionate:	X	Continue to full CCIA:	
<b>Reason for decision</b>	There is no impact on any of the environmental factors arising from responding to the consultation.			
<b>Signed (Assistant Director or equivalent)</b>				
<b>Date</b>				

# Equality impact assessment (EIA) form: evidencing paying due regard to protected characteristics

(Form updated October 2025)

## *Council response on draft NPPF consultation*

An Equality Impact Assessment (EIA) form is a document that proves paying due regard by considering protected characteristics. EIAs that accompany reports presented to Councillors for decision-making are published with the committee papers on our website and are also available in hard copy at the relevant meetings.

### Section 1: Initial Equality Impact Assessment Screening

This section documents the equality screening process of actual or potential impacts of the proposed activity on a specific protected characteristic, along with NYC's additional agreed-upon characteristics, to determine whether a full Equality Impact Assessment (EIA) is necessary or appropriate.

Basic Details	
<b>Directorate</b>	Community Development
<b>Service area</b>	Planning Policy and Place
<b>Proposal being screened</b>	Council response on draft NPPF consultation
<b>Officer(s) carrying out screening</b>	James Campbell
<b>Lead Officer and contact details</b>	James Campbell, james.campbell@northyorks.gov.uk
<b>Date of the assessment</b>	10/02/2026
<b>Please describe briefly what this EIA is about.</b> (e.g. are you starting a new service, changing how you do something, or stopping doing something?)	There is a national consultation on a new draft NPPF. As part of the consultation a set of questions has been set. Officers across the council have written responses to the questions. The report seeks executive member sign-off for submission of these responses.
<b>What does the authority hope to achieve by it?</b> (E.g. to save money, meet increased demand, do things in a better way.)	Providing the council's considered response to government on the draft NPPF and by doing so influence the final version of the new NPPF.
Further Details	
<b>1.1 How have stakeholders been involved in this policy/ decision/ proposal?</b> (e.g. a consultation exercise)	Officers from across the council have provided responses based on their particular area of specialism.
<b>1.2 Will the proposal have a significant effect on how other organisations operate?</b> (e.g. partners, funding criteria, etc.). Please explain briefly	No impact
<b>1.3 Impact on people with any of the following protected characteristics as defined by the Equality Act 2010, or NYC's additional agreed characteristics</b>	
As part of this assessment, please consider the following questions:	
<ul style="list-style-type: none"> <li>To what extent is this service used by particular groups of people with protected characteristics?</li> <li>Does the proposal relate to functions that previous consultation has identified as important?</li> <li>Do different groups have different needs or experiences in the area the proposal relates to?</li> </ul>	

If for any characteristic, it is considered that there is likely to be an adverse impact or you have ticked 'Don't know/no info available', then a full EIA should be carried out where this is proportionate. You are advised to speak to your directorate representative for advice if you are in any doubt.

**Tick and indicate which protected characteristics are identified as relevant to the proposal (positive, negative, neutral or don't know).**

Protected characteristic	Impact				Comments
	Positive	Negative	Neutral	Don't know	
Age			X		No impact identified for responding to the consultation
Disability			X		No impact identified for responding to the consultation
Sex			X		No impact identified for responding to the consultation
Race (including GRTS)			X		No impact identified for responding to the consultation
Gender reassignment			X		No impact identified for responding to the consultation
Sexual orientation			X		No impact identified for responding to the consultation
Religion or belief			X		No impact identified for responding to the consultation
Pregnancy or maternity			X		No impact identified for responding to the consultation
Marriage or civil partnership			X		No impact identified for responding to the consultation

**NYC's additional characteristics**

People in rural areas			X		No impact identified for responding to the consultation
People on a low income			X		No impact identified for responding to the consultation
Carer (unpaid family or friend)			X		No impact identified for responding to the consultation
Are from the Armed Forces Community (including veterans)			X		No impact identified for responding to the consultation

**1.4 To which Part(s) of the Public Sector Equality Duties is the Policy/decision/proposal relevant? Tick and briefly describe.**

General Duties	Yes	No	Details
Eliminate unlawful discrimination, harassment and victimisation	<input type="checkbox"/>	X	
Advance equality of opportunity	<input type="checkbox"/>	X	
Foster good relations between different groups	<input type="checkbox"/>	X	

**1.5 Decision (Please tick one option)**

<b>Decision to recommend this policy/ decision for an Equality Impact Assessment?</b>	Yes	<input type="checkbox"/>	No	X
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If the answer is "Yes", or you indicate a negative impact on any of the characteristics mentioned in the table above, please continue to Section 2 and complete the full Equality Impact Assessment. If the answer is "No", please give a brief reason here.

<b>Signed</b> (Assistant Director or equivalent)	
<b>Date</b>	

## Section 2: Equality Impact Assessment

This section aims to provide a full assessment of the actual or potential impacts on specific protected characteristics, along with NYC's additional characteristics. It will also identify the proper actions to mitigate these impacts, if needed.

**2.1 Evidence, Consultation and Data: What data or evidence source(s) has/ have been used to inform this assessment?** Select the relevant source (s):

- Demographic data
- Service usage data
- Consultation feedback
- National/local research and report
- Expert opinion
- Others

**2.2 Stakeholder Engagement: What engagement has been done regarding the proposal and what are the results?**

- Who has been consulted?
- How were they consulted?
- What feedback was received?

**2.3 What positive impact will this proposal have on the council budget, people, community, economic growth and environment, etc? Please explain briefly**

**2.4 Please briefly describe how will this proposal affect people with protected characteristics? Only those who are identified as relevant to the proposal in section 1.**

protected characteristics	Negative	Don't know	Why will it have this effect? Provide evidence from engagement, consultation and/or service user data or demographic information, etc.
Age			
Disability			
Sex			
Race (including GRTS)			
Gender reassignment			
Sexual orientation			

Religion or belief			
Pregnancy or maternity			
Marriage or civil partnership			
<b>NYC's additional characteristics</b>			
People in rural areas			
People on a low income			
Carer (unpaid family or friend)			
Are from the Armed Forces Community (including veterans)			

**2.5 Geographic impact: Please detail where the impact will be** (please tick all that apply)

North Yorkshire wide	
Craven	
Hambleton	
Harrogate	
Richmondshire	
Ryedale	
Scarborough	
Selby	

If you have ticked one or more areas, will specific town(s)/ village(s) be particularly impacted? If so, please specify below.

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**2.6 Will the proposal affect anyone more because of a combination of protected characteristics?** (e.g. older women or young gay men) State what you think the effect may be and why, citing evidence from Q2.1 & Q2.2, e.g. engagement, consultation and/or service user data or demographic information, etc.

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**2.7 Mitigation and Actions: List the actions that will be taken to reduce or eliminate any negative impact identified above and how positive impacts will be enhanced.** Briefly describe the action you defined.

Actions	Lead	By when


**2.8 Monitoring and Review: If the proposal is to be implemented, how will the impact be monitored?**  
 Briefly describe the monitoring arrangements/systems that will be put in place to find out how the expected outcomes have been achieved in practice.

**2.9 Conclusion: Please summarise the findings of your EIA, including impacts, recommendations in relation to addressing impacts, including any legal advice, and next steps.** This summary should be used as part of the report to the decision maker.

**2.10 Sign off section**

**This full EIA was completed by:**

Name:

Job title:

Directorate:

Signature:

Completion date:

**Authorised by relevant Assistant Director (signature):**

**Date:**

*Once this has been signed off, please send it to [webteam@northyorks.gov.uk](mailto:webteam@northyorks.gov.uk) for publication on the appropriate webpage.*

**Publication:**

To help people find completed EIAs, we publish them in the Equality and Diversity section of the NY Council [website](#).

**Contact details**

If you need further support and guidance about carrying out EIA, please contact your directorate equality representative as listed in Stage 4 on our Intranet: [Paying due regard to equality using equality impact assessments](#)

Or contact North Yorkshire Council's equality team on email [Equality@northyorks.gov.uk](mailto:Equality@northyorks.gov.uk)