

Annex A: Cotswold District Council responses to consultation questions on 'Proposed reforms to the National Planning Policy Framework and other changes to the planning system'

Consultation Question	<i>Cotswold District Council Response</i>
<p>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?</p>	<p><i>Unnecessary, don't know what being statutory would achieve.</i></p>
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p><i>Agree</i></p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p><i>However, there is a risk that over rigid national decision-making policies will not sufficiently recognise the complexity of planning in National Landscapes.</i></p>
<p>3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p><i>Agree</i></p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p><i>Housing land supply in one section is useful, makes NPPF shorter, can go straight to one annex, direct resource, referencing is easier</i></p>
<p>4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p><i>Partly agree</i></p>

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<p>a) Please provide your reasons, particularly if you disagree.</p>	<p><i>A single consolidated Framework is logical, but Traveller site identification requires sensitive engagement, and detailed site specific assessments.</i></p>
<p>5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree</i></p>	<p><i>partly agree</i></p>
<p>a) Please provide your reasons, particularly if you disagree</p>	<p>Whilst the consistent use of 'substantial' for weighting across the document is beneficial for consistency and comparison, from a pragmatic perspective, the word 'substantial' is already used in relation to harm, where it has a specific meaning. It is clearer to use a different word for the harm and weighting, rather than using 'substantial' again, which becomes repetitious, less clear and potentially more confusing for applicants; for example, when 'substantial weight' is given to harm that is below the 'substantial harm' threshold. Perhaps both consistency and clarity would be served by using 'substantial weight', but in changing 'substantial harm' to 'considerable harm'.</p>
<p>6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p><i>Agree</i></p>

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a) Please provide your reasons, particularly if you disagree.	Needs to be considered in wider spatial strategy, context. Chapter 2, part 6 (and the glossary) should include town councils as well as parish councils and neighbourhood forums.
7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	<i>Agree</i>
a) 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?	Refresh, captures government policy changes but review not guaranteed alteration e.g. resetting housing targets review not a guaranteed alteration.
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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	<i>Agree</i>
a) Please provide your reasons, particularly if you disagree.	<i>N/A</i>

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9) Do you agree with the role, purpose and content of local plans set out in policy PM2? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	<i>Agree</i>
a) Please provide your reasons, particularly if you disagree.	<i>N/A</i>
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	<i>Yes</i>
a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.	<i>N/A</i>
11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	<i>Agree</i>
a) Please provide your reasons, particularly if you disagree.	Centralisation of policy does speed up decision making, but not always one size fits all, would complementary policies avoid limitations, opening up land that might not have come forward otherwise?
12) Do you agree with the approach to initiating plan-making in PM7? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	<i>Partly agree</i>
a) Please provide your reasons, particularly if you disagree	Sceptical about how plans will be delivered within timeframe.

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13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree
a) Please provide your reasons, particularly if you disagree.	N/A
14) Do you agree with the approach to identifying land for development in PM9? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree
a) Please provide your reasons, particularly if you disagree.	N/A
15) Do you agree with the policies on maintaining and demonstrating cross-boundary cooperation set out in policy PM10 and policy PM11? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree
a) Please provide your reasons, particularly if you disagree.	In principle yes, but concerns over resources, deliverability, reliance on third parties, can't guarantee third party stakeholders will respond in a timely manner.
16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree
a) Please provide your reasons, particularly if you disagree.	In principle agree, but dependent on future viability guidance, varying approaches impacts transparency, good to include but more

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	guidance needed to improve transparency. Ensuring that policy requirements clearly reflect affordable housing tenure requirements is also beneficial from the perspective of providing clarity around expected affordable housing and delivery via the planning system.
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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree
a) Please provide your reasons, particularly if you disagree.	National policy should set clearer expectations. PPG/NPPF can provide a clear framework and checklist of how to determine un/viability on-site.
18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Disagree
a) Please provide your reasons, particularly if you disagree.	<p>The ability of LPA's to set affordable housing requirements, drawing upon relevant evidence of local need is critical to ensure identified need is met.</p> <p>Councils should be able to aspire to higher energy efficiency standards for new housing developments above those set in building regulations.</p>

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<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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p>
<p>a) 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>N/A</p>
<p>20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?</p>	<p>Concerns over delivering 30 month local plans, resources required, reliance on others, lack of contingency time, concerned about dilution of safeguards that currently exist, want to ensure allocated sites are viable</p>
	<p>PM5: Neighbourhood Plans In part 1 the term should be replaced by can. There are many examples of land already being allocated all permissioned or there is a negligible or already met local need. The cuts in government funding makes paying for housing needs assessments, viability studies, environmental assessments et cetera. Almost impossible for many local councils and some groups will focus on expediting a plan on other specific pertinent planning issues for these reasons the term 'should' adds an unrealistic level of expectation and 'can' would be more appropriate.</p>

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Neighbourhood Priority Statements	Neighbourhood Priority Statements There has been an opportunity missed to include mention of Neighbourhood Priority Statements, established by the Levelling-Up and Regeneration Act 2023, and how local authorities should consider them in preparation of a Local Plan.
21) Do you agree with the principles set out in policy DM1? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	<i>Agree</i>
a) Please provide your reasons, particularly if you disagree.	<i>Encourages consultation, places emphasis on pre-app, "requiring pre-app" requires clarification</i>
22) Do you agree with the policy DM2 on information requirements for planning applications? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	<i>Partly agree</i>
a) Please provide your reasons, particularly if you disagree.	<i>But needs clarity around wording on DM2.2 on requiring further assessment. It is unclear whether the draft wording requires Local Plan policies to explicitly mandate the submission of information, or whether it is sufficient for those policies to require an appraisal of ecological or arboricultural impacts. For example, Local Plan Policies EN7 (Trees) and</i>

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	<p><i>EN8 (Biodiversity) set out clear, detailed requirements that need to be satisfied. However, like many development plan policies nationally, they do not specifically require a "particular assessment" (e.g. Preliminary Ecological Appraisal or Arboricultural Impact Assessment) to be submitted at validation. Under the draft NPPF wording, it is uncertain whether such assessments could still be included on a Local List.</i></p> <p><i>The national information requirements do not require any ecological surveys, tree surveys, or other environmental assessments to be submitted at validation stage. If Local Lists can only require such information where the development plan explicitly calls for that specific assessment, there is a real risk that LPAs will be prevented from obtaining essential baseline information needed to determine impacts lawfully. The inclusion of clearer technical detail allwith regard to affordable housing at this stage would speed-up determination and be a more efficient use of officer time.</i></p> <p><i>In principle, national checklists are not objectionable. However, greater clarity is needed on when and how local checklists can impose additional requirements.</i></p> <p><i>Missing in Annex C: biodiversity, landscape, trees, habitat regulations assessment, BNG, design access statements, CIL.</i></p>

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23) Do you have any views on whether such a policy could be better implemented through regulations?	In principle no issues with national validation requirement, but must be robust.you three are
24) Do you agree with the principles set out in DM3? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Partly disagree
a) Please provide your reasons, particularly if you disagree.	<p>DM3 places significantly greater emphasis on resolving issues within live applications than the current NPPF paragraph 39. This risks undermining the value and purpose of pre-application engagement, which is explicitly designed to identify and resolve issues prior to submission. The requirement to negotiate solutions during determination is likely to increase workload pressures, extend processing times, and reduce the effectiveness of published local negotiation protocols.</p> <p>DM3(d) may place case officers in a position where applications must be determined without full technical advice, creating a risk of unlawful or poor-quality decision-making. Statutory and internal consultees sometimes fail to meet deadlines, and the burden of risk should not fall solely on case officers.</p> <p>DM3(c) risks placing disproportionate weight on pre-application comments, which are necessarily preliminary, high-level and</p>

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	<p>non-binding. The framework should make clear that pre-application advice is not determinative and should not unduly constrain evidence-based decision-making at application stage.</p> <p>Need emphasis on consultees being required to respond</p> <p>Needs major resource overview</p> <p>In conflict with who statutory consultees are</p> <p>Diluting quality of outcomes at cost of speed/pace of delivery.</p> <p>If a decision is made without the input of an important consultee, it will be the LPA that will be accountable. This does not seem fair.</p>
<p>25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>N/A</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>Current guidance is minimal</p> <p>Maybe introducing statutory time limit to process modifications and a fee, including for statutory consultees, and for non-LPA authorities,</p>

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	<p>such as county council section 106's where LPA's have little control over the timescales taken to agree a variation.</p> <p>Push for prior engagement with all parties in the NPPF.</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 the supply of affordable housing.</p>	<p>Transparency, engagement, see 27.</p>
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Is this referencing proposed national model conditions? Also seems to duplicate existing statutory instruments</p>
<p>30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Partially agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Some regulatory regimes significantly impact the delivery of development, such as water/sewerage/resource capacity and infrastructure and this needs to be recognised.</p> <p>However, DM7 reaffirms that planning should not duplicate the role of other regulatory regimes. This does and will result in significant risks to delivery, e.g. lack of infrastructure and infrastructure planning by water authorities. If we are to trust that separate regimes will</p>

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	operate effectively and align improvement plans with allocated development, they need to be made to do so.
31) Do you agree with the new intentional unauthorised development policy in policy DM8? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Partly disagree
a) Please provide your reasons, particularly if you disagree.	It is not for planning to assume intent. It has previously been established through case law that the intentions or character of an applicant is not a material consideration other than in some exceptional circumstances, and this policy blurs this line. However, if this change is made, how would a LPA prove intent?
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?	This could result in harmful neighbour/community conflict and derision and could be used as a tool for neighbour disputes.
a) If so, are there any particular additions or mitigations which we should consider?	It would only be feasible if the LPA could demonstrate that it had formally informed the owner/occupier that planning permission was required.
33) Do you agree with the new Article 4 direction policy in policy DM10? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree
a) Please provide your reasons, particularly if you disagree.	Agree but needs more guidance.

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<p>34) Do you agree with the proposed approach to setting a spatial strategy in development plans? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, stronglydo you disagree.</i></p>	partly disagree
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>CDC supports having a clear spatial strategy, but the proposed approaches to Richard for a rural highly constrained authority like Cotswold. The model does not reflect the districts dispersed settlement pattern extensive protected landscapes or infrastructure limitations. Too rigid for rural areas: The proposed settlement boundary led approach doesn't reflect how small Cotswold villages function or grow.</p> <p>Insufficient recognition of protected landscapes: The Cotswolds National Landscape requires far more locally tailored spatial planning than national policy allows.</p> <p>Conflicts with station density policies: High minimum densities around stations (e.g. Kemble, Moreton in Marsh) are unrealistic given landscape, heritage and infrastructure constraints.</p> <p>Infrastructure constraints overlooked: Rural transport limitations mean national spatial rules may force development into locations that are not sustainable in practice.</p>
<p>35) Do you agree with the proposed definition of settlements in the glossary? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree

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a) Please provide your reasons, particularly if you disagree.	Development next to undeveloped allocations for planning permission needs to be carefully considered in case the former development never comes forward.
36) Do you agree with the revised approach to the presumption in favour of sustainable development? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree
a) Please provide your reasons, particularly if you disagree.	But note that S5 (d) may not result in sustainable development if it involves the redevelopment of a previously developed land for housing in an isolated location with no services or infrastructure.
37) Do you agree to the proposed approach to development within settlements? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	partially agree
a) Please provide your reasons, particularly if you disagree.	<p>While we support clarity on development within settlements, the proposed default "approve unless adverse effects substantially outweigh benefits" approach is too permissive for rural areas like Cotswold, where many settlements have very limited services, poor public transport and high landscape/heritage sensitivity. The policy risks encouraging unsustainable growth in locations that cannot support it.</p> <ul style="list-style-type: none"> • Not all settlements are sustainable: Many villages lack shops, schools, healthcare or buses. A blanket presumption for development within any settlement is inappropriate.

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	<ul style="list-style-type: none"> • Risk of car dependent patterns: Allowing more development in small rural settlements pushes residents into private car use, contrary to sustainable transport aims. • Landscape and heritage sensitivity: Even "in settlement" schemes can cause harm in the Cotswolds National Landscape and numerous conservation areas. • Weakens local spatial strategy: It undermines the Council's ability to prioritise growth in the most sustainable market towns. • Too blunt an approach: A single national rule cannot reflect the diversity of settlement size, function, character and capacity in rural areas. <p>? areas of adopted on site BNG? I know it says its not a restrictive list but AM's, LB's and NDHA's or are these covered by (c)?</p>
<p>38) Do you agree to the proposed approach to development outside settlements? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Partially agree
<p>a) Please provide your reasons, particularly if you disagree.</p>	But note that S5 (d) may not result in sustainable development if it involves the redevelopment of a previously developed land for housing in an isolated location with no services or infrastructure
<p>39) Do you have any views on the specific categories of development which the policy would allow to take place outside</p>	Partially disagree

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<p>settlements, and the associated criteria? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	
<p>a) Please provide your reasons.</p>	<ul style="list-style-type: none"> • 'Redundant or disused buildings' at HO11 (c) needs a definition as does 'truly outstanding' at (e)i. • Overly permissive list: The wide range of acceptable development types could open the door to significant growth in isolated or poorly connected rural areas. • Risk to landscape and rural character: The Cotswolds' nationally protected landscape is particularly vulnerable to cumulative small scale development outside settlements. • Transport sustainability concerns: Many locations outside settlements have no public transport, meaning almost all development would be car dependent. • Insufficient safeguards: Some categories (e.g. redevelopment of previously developed land or meeting unmet need) are too loosely defined and could allow inappropriate schemes to come forward. • Weakens settlement hierarchy: By allowing more development outside defined settlements, the policy undermines the ability to focus growth in the most sustainable locations.
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Partially agree</p>

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<p>a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.</p>	<p>Not sure this this is the right Q for 40? But development in and around a train station still needs to consider its context rather than being seen as a standalone consideration as the policy wording suggests.</p>
<p>41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy? <i>Strongly agree, partly agree, neither agree or disagree, partly disagree, strongly disagree.</i></p>	<p>Strongly disagree</p>
<p>a) If not, please provide your reasons</p>	<p>This policy does not change the current approach in the NPPF.</p> <p>The criteria could also be interpreted as: Where a plan has either left space to build within development boundaries to support new housing, or where a plan has allocated specific sites for new homes, we could consider that it meets these criteria. Plans where development boundaries have been drawn tightly around existing developed areas are unlikely to comply.</p> <p>If a plan meets these criteria, CDC would continue to apply the housing policies in that Neighbourhood Plan until the plan reaches 5 years old. These plans will continue to have full weight applied to their housing policies in planning decisions made by CDC, unless appeal decisions indicate otherwise.</p>

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	<p>In all other Neighbourhood Plans, housing policies, in particular development boundaries, will become out of date and will be afforded significantly less weight in planning decisions.</p> <ul style="list-style-type: none"> • the adverse effects of a housing proposal may be on the wildlife, local green spaces etc., hard to see the relevancy of how that can be outweighed by not having allocations. A proposal should seek to mitigate adverse effects independent of housing requirements. • Allocations are now very difficult for local councils to make with the government funding cut. • The Local Plan should be allocating to meet the identified requirement anyway, which puts undue requirement on the Neighbourhood Plan here. • Part b is too sweeping, effectively make a Neighbourhood Plan redundant due to not making allocations. • Overall, this would discourage neighbourhood planning. Whereas, on average they have been allocating 39 additional dwellings per plan (Gavin Parker, Impacts of Neighbourhood Planning in England). Counter-intuitive approach. <p>As a solution, recommend removing part (b), but instead introduce a requirement for Neighbourhood Plans to undertake a Call for Sites, and an assessment of sites, taking into account the housing requirement – this process may or may not result in the allocation of suitable sites - of which this information will go to public consultation,</p>

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	independent examination, referendum and local authority sign-off (which avoids any purposeful stifling of housing development).
42) Do you agree with the approach to planning for climate change in policy CC1? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree
a) Please provide your reasons, particularly if you disagree.	Proper implementation of policy CC1 will need specialist input over and beyond a qualified planning practitioner. This would be an additional resource to the LPA
43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree nor disagree
a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?	potential conflict with building regs – another legislative regime that planning should not seek to duplicate or extend.
44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree
a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?	some of the measures proposed, and any additional measures, would need specialist input over and beyond that of a qualified planning practitioner and would therefore be an additional resource to the LPA

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<p>45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	strongly disagree
<p>a) Please provide your reasons</p>	much more information is required for this policy to be robustly implemented by an LPA
<p>46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?</p>	This requires input from a specialist
<p>47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?</p>	building regulations are a significant tool in addressing climate change through the provision of housing and other buildings. The government should be looking at these regulations first, rather than putting the burden of delivery on the local plan process.
<p>48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Partly disagree</p> <p>Can generally support part 5, logical approach with some flexibility, and neighbourhood planning groups typically would like to know where they stand in the local authority's view on expected housing numbers. This would now be a requirement rather than optional as per current NPPF para 70.</p> <p>It would be useful to retain the last sentence of para 60 of the current NPPF: Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination,</p>

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	<p>unless there has been a significant change in circumstances that affects the requirement.</p> <p>A clear definition of what constitutes 'specialist community-based accommodation' ought to be provided for guidance.</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Cotswold District Council supports the principle in HO2 that the housing requirement must be a policy tested, deliverable figure rather than a direct adoption of the Standard Method housing need. For a district with extensive National Landscape coverage, significant heritage sensitivity, and a dispersed rural settlement pattern, it is neither realistic nor environmentally responsible to meet housing need in full. HO2 must continue to allow authorities with substantial constraints to set a lower housing requirement where justified by evidence, and to ensure that the plan remains sound, deliverable and consistent with statutory landscape and environmental designations.</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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Strongly agree</p>
<p>a) If so, what elements should this guidance cover?</p>	<p>This ought to take account of and incorporate definitions under the Supported Housing Regulatory Oversight Act (SHROA) as much needed types of accommodation are (in the experience of local</p>

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Consultation Question	<i>Cotswold District Council Response</i>
	<p>authorities in Gloucestershire) are not brought forwards as part of a new development, or if much-needed specialist accommodation (e.g for people fleeing domestic abuse, etc) is delivered, it is typically speculative and unplanned in nature. This leads to poor and disjointed outcomes for the residents of such schemes.</p> <p>It could be helpful to name some indicators for Affordable Housing need. For example, the Local authority affordable housing register is a guide to affordable housing demand/need in an area but it is not given any weight in Planning terms. A problem often encountered is that a local housing needs survey (parish level) identifies much lower demand/need numbers than are already contained on the Affordable Housing Register.</p>
<p>50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<ul style="list-style-type: none"> • Simplifies national policy: Having all relevant policies in one place makes the Framework clearer and easier to navigate. • Reduces duplication: Removing a separate policy document avoids overlap and improves consistency.

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Consultation Question	<i>Cotswold District Council Response</i>
	<ul style="list-style-type: none"> • Supports more integrated planning: Embedding traveller site considerations into wider housing and spatial strategy policies helps ensure needs are assessed alongside other groups. • Still allows local application: The national principles can be interpreted at a local level, ensuring CDC can reflect its rural context, constraints and evidence base.
<p>51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p> <p>Clearer national guidance would provide much needed consistency and support LPAs in preparing robust assessments. This is particularly important for rural and constrained areas like Cotswold, where baseline data is limited and needs can be complex to evidence.</p>
<p>a) If so, what are the key principles this guidance should establish?</p>	<ul style="list-style-type: none"> • Improves consistency: Standardised guidance would reduce variation in assessment quality between authorities. • Helps evidence gathering: Traveller needs can be difficult to quantify; clearer methods would improve accuracy and transparency. • Supports strategic planning: Stronger guidance would help align needs assessment across wider housing and spatial strategies. • Reduces challenge at examination: A clearer national framework would help ensure assessments are robust, defensible and easier for Inspectors to apply.

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Consultation Question	<i>Cotswold District Council Response</i>
<p>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 local plan 5-year housing land supply? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Partly disagree
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Annex D improves clarity on the calculation process, but the guidance on selecting the appropriate buffer remains too generic and leaves room for interpretation, especially for rural authorities with fluctuating delivery patterns.</p> <ul style="list-style-type: none"> • Still too much ambiguity: The criteria for choosing different buffer levels are not specific enough for varied rural contexts. • Doesn't reflect rural delivery volatility: Small sites dominate delivery in Cotswold, making yeartoyear supply more variable than Annex D implies. • Risk of inconsistent interpretation: Without tighter national direction, different Inspectors may apply buffer expectations differently. • Limited support for constrained authorities: Areas with environmental and infrastructure limits need clearer guidance on what constitutes a "reasonable" buffer.
<p>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</p>	Partly disagree

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Consultation Question	<i>Cotswold District Council Response</i>
<p>relate to decision-making? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Annex D is clearer than before, but important procedural elements remain open to interpretation. For a rural authority with variable delivery patterns and heavy environmental constraints, the guidance still lacks the precision needed to give confidence in how supply and the Housing Delivery Test will be applied in practice.</p> <ul style="list-style-type: none"> • Still too much ambiguity: Key steps—such as how supply should be validated and how different components interact—could be set out more explicitly. • Doesn't reflect rural delivery realities: Small-site dominated housing markets create volatility that Annex D doesn't fully account for. • Risk of inconsistent interpretation: Without stronger wording, different LPAs and Inspectors may apply the rules differently. • Unclear links to decisionmaking: The relationship between supply calculations, HDT outcomes and the presumption in favour of development still isn't set out in a simple, unambiguous way.
<p>54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Partly disagree</p> <p>The principle is sound, but the requirements in Annex D lack the clarity and detail needed for practical implementation, particularly for rural authorities where identifying and delivering suitable sites is challenging.</p>

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Consultation Question	<i>Cotswold District Council Response</i>
	<ul style="list-style-type: none"> • Clarity still limited: Annex D sets out headline expectations but does not provide enough methodological guidance on demonstrating a reliable 5year supply for traveller sites. • Rural delivery challenges not addressed: In areas like Cotswold, environmental and land availability constraints make it difficult to identify deliverable sites, and clearer criteria would reduce uncertainty. • Monitoring expectations underdeveloped: The Annex does not fully explain how delivery should be tracked, reported or validated, which risks inconsistency across authorities. • Risk of dispute at examination: Without tighter national direction, assessments may be vulnerable to challenge, undermining plan soundness.
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>No Q on HO2 or HO3? HO4 - Agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Any comments on HO4?</p>
<p>56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree. The District is predominantly rural, with many small settlements facing acute affordability pressures and limited opportunities to deliver social and affordable housing.</p>

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Consultation Question	<i>Cotswold District Council Response</i>
	<p>Broadening the definition will enable more villages within Cotswold to benefit from lower affordable housing thresholds, rural exception site policies, and greater flexibility to secure genuinely affordable homes for local people.</p> <p>The proposal is therefore a positive reform for rural districts such as Cotswold.</p> <p>Allowing local planning authorities to set their own lower thresholds for affordable housing in designated rural areas will better support the delivery of rural social and affordable housing.</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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p> <p>But central govt should lead in mandating the delivery of M4(2) and M4(3) homes across all tenures to help support our ageing population to remain independently healthy at home for longer. The English Housing Survey finds that the level of accessibility in existing housing stock is very low, contributing to poor health outcomes and a lack of housing choice for disabled and frail residents.</p>
<p>58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Partly disagree</p> <p>f have a long-term illness or disability, which to some degree, is likely to correlate with requiring accessible homes.</p>

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Consultation Question	<i>Cotswold District Council Response</i>
<p>a) Please provide your reasons, and would you support an alternative minimum percentage requirement?</p>	<p>This percentage could be increased as meeting M4(2) is not a costly requirement and provides flexibility for the future</p> <p>The proportion of M4(2) homes to be delivered on sites over 100 over the the Plan Period ought to be closer to 100%. It isn't costly and will futureproof the housing stock going forwards. 40% doesn't account for differing levels of (theoretical) levels of need across tenures. The English Housing Survey has determined that 61% of social renters</p> <p>This could be increased to 50% AH</p>
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>This is largely a logical proposal and will aim to ensure that the different needs of multiple groups are accounted for across the duration of the local plan in a consistent and coordinated way, rather than being speculative (development led) or not delivered at all for some groups.</p>
<p>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</p>	<p>Strongly agree</p>

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of 150 homes or more? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?	<p>This would help ensure balanced communities, avoiding mono tenure/type development.</p> <p>A wide mix of tenures helps to diversify new home offers, potentially supporting SMEs as well as a range of product types, creating a mixed and balanced communities. The threshold of 150 units would appear to be reasonable.</p>
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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	HO6 - 10% for what? That listed in HO5?
a) Please provide your reasons	This could be difficult in some areas – e.g National Landscape areas and is made more problematic if a 5% cap on rural exception sites is introduced (which it should not – see Q75)
62) Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?	<p>Agree</p> <p>Consideration should be given to explicitly adding the local authority affordable housing homeseeker register as an indicator of housing need.</p>
63) Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military	Partly agree

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<p>housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>This needs to be introduced and implemented in a way that does not introduce military homes at the expense of social and affordable homes.</p> <p>Would this not eat into housing needs for the local community and be ringfenced for the military thereby lessening provision for local needs?</p> <p>Whilst the proposals to add military affordable housing to the affordable housing definition appear agreeable, central govt ought to be mindful that allowing this to be delivered as part of the overall affordable housing requirements could ultimately disadvantage households already on the waiting lists. Good quality accommodation is required by everyone and allocation or ring-fencing, should be done only in consultation with the local authority and taking all local needs and priorities into consideration.</p>
<p>64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Neither agree nor disagree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>We want mixed communities across developments not one rule for affordable and another for market housing.</p>

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	In the experience of Gloucestershire local authorities where developments are delivered that include larger market homes, a proportionately equivalent size is not provided for the affordable housing. In other words, developers can seek house types that are commensurate with maximum profit.
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree
<p>a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?</p>	<p>In theory, requiring a minimum proportion of social rent (unless a higher proportion is set out within Local Plans) could help to boost the overall delivery of social rented homes- a laudable and hugely positive outcome. However, the Government should be mindful that (notwithstanding the proposed changes to viability within this consultation) developers may seek to reduce overall affordable housing contributions, or claim that sites are unviable, due to a set percentage of social rented homes being provided, especially in areas with marginal viability. Nevertheless, if the Government is serious about boosting the supply and delivery of social rented homes, then, provided this 'minimum proportion' is carefully calculated and implemented, this proposal sounds like a good start.</p>

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Consultation Question	<i>Cotswold District Council Response</i>
<p>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?</p>	<p>Partly disagree</p>
<p>a) If so, what changes would be beneficial?</p>	<p>Whilst we appreciate the significant housing pressures being faced by local authorities nationwide, including locally in Gloucestershire, the Government should focus their efforts on boosting the level of affordable housing available in perpetuity. Flexibility around space standards, whilst perhaps well-intentioned, is likely to lead to developers using this potential loophole in planning policy to develop low—quality, overly cramped homes to meet the overwhelming need for social housing. This does not address the root cause of the housing issues faced either locally or nationally, rather, addressing a symptom. Thus, as stated above, the Government should focus on introducing space standards (rather than revoking them to enable development of a potentially dubious quality) and delivering affordable housing in perpetuity to meet housing need both now, and well into the future</p>
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Disagree. Some LA's do not have the resources or expertise to deliver housing. Applicants should deliver the affordable housing as part of the development as this provides consistency of design and delivery (promotes tenure blind approach).</p> <p>Cash payments should only be used in exceptional circumstances and at the discretion of the LPA.</p>

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<p>a) 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.</p>	<p>Yes it would be desirable -. Some LA's do not have the resources or expertise to deliver housing.</p> <p>Applicants should deliver the affordable housing as part of the development as this provides consistency of design and delivery (promotes tenure blind approach) and promotes balanced communities. Cash payments should only be used in exceptional circumstances and at the discretion of the LPA</p> <p>Whilst the difficulties faced by SME's are significant, helping SME's and other developers by offering the discretion to provide affordable housing via commuted sums in lieu of on-site delivery will ultimately undermine the Government's ambition of delivering affordable housing at a 'once in a generation' scale. Deferring the delivery of on-site affordable housing leaves local authorities in a position where they may struggle to spend or commit receipts due to fierce competition for land, or due to high housing costs (where acquisitions are sought). Whereas on-site delivery helps to meet immediate affordable housing need and create mixed and balanced communities. The Government should therefore explore other options to support SME's and development on smaller sites.</p>
<p>b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash</p>	<p>Some LA's do not have the resources or expertise to deliver housing. Applicants should deliver the affordable housing as part of the</p>

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Consultation Question	<i>Cotswold District Council Response</i>
<p>contributions in lieu of on-site delivery should be permitted in 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>development as this provides consistency of design and delivery (promotes tenure blind approach).</p> <p>Cash payments should only be used in exceptional circumstances and only at the discretion of the LPA.</p> <p>However, affordable housing contributions may be sought off-site in certain circumstances. For example, where an applicant is seeking to incorporate a listed building into the application, this may make the long-term management of potential on-site affordable housing costly and technically difficult. Equally, if, after reasonable endeavours have been exercised by the developer to secure an registered provider partner without success (to the satisfaction of the local authority), a commuted sum in lieu of on-site affordable housing should be permitted.</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>A Risk is that Developers will prefer paying a commuted sum rather than delivering policy compliant affordable housing numbers.</p> <p>The Local Authority may not have the expertise of available land to then use the commuted sum money to deliver affordable homes elsewhere. This could lead to a further reduction in the number of affordable homes being delivered whilst developers continue to deliver open market homes. The Economies of Scale delivering the Affordable Homes contemporaneously with the open market home swill be most and the delivery of the affordable homes will be more expensive.</p>

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	<p>If implemented as proposed, this policy would result in an overall decline of affordable housing delivery, at a time when the Government has 1.3 million households on housing registers nationwide, and the numbers of households in temporary accommodation is at record levels. Whilst this may support SME developers, and help to boost overall housing delivery, this should not come at the cost of delivering much-needed affordable housing for those in the greatest need. Notably, the Government’s recent research on the relationship between build-out rates and the presence of affordable housing on-site broadly indicates that the presence of affordable housing on-site (with associated triggers to prevent the completion of development) generally helps to accelerate housing delivery. It therefore seems counterproductive to give SME developers a blanket option to revert to commuted sums in lieu of on-site delivery if the Government wishes to achieve it’s stated aim of delivering 1.5 million homes over the current Parliamentary term. Equally, this policy is likely to have a detrimental effect on smaller, SME-level registered providers, many of which enable the delivery of affordable housing on small sites, who remain under considerable pressure given their financial resources, regulatory requirements and other external factors.</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>Further guidance is required to enable LPA’s to spend commuted sums more effectively. Local Authorities will often seek to save commuted sum contributions, where possible, to contribute to longer-</p>

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	<p>term strategic objectives, rather than seeking to spend these monies immediately. Notwithstanding this, the Government could more widely publish IFS figures around commuted sum monies held by local authorities, and require local authorities to indicate what they intend to spend these monies on, to aid public transparency. In terms of spending commuted sums more quickly, the raising public awareness regarding the publication of IFS figures may aid local authorities in spending commuted sums more quickly- although the Government should be aware that this may be to the detriment of longer-term strategic objectives pursued by local authorities (e.g. saving monies for a land acquisition).</p>
<p>70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?</p>	<p>The focus should be on getting developers to deliver policy compliant affordable housing numbers contemporaneously with the open market housing rather than putting the onus on LA delivery via commuted sums.</p> <p>This may be helpful for the purposes of providing clarity to local authorities and developers about how commuted sums will be calculated, which, owing to lack of capacity and the current status of many Local Plans, may remain unclear. Any guidance/agreed approach to calculating affordable housing commuted sums should be made in agreement with local authorities.</p>
<p>a) If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which</p>	

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<p>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>This may be helpful for the purposes of providing clarity to local authorities and developers about how commuted sums will be calculated, which, owing to lack of capacity and the current status of many Local Plans, may remain unclear. Any guidance/agreed approach to calculating affordable housing commuted sums should be made in agreement with local authorities.</p> <p>Whilst not wedded to any one model, the Government should ensure that whatever guidance is chosen should be agreed in consultation with local authorities. It should be evidence-based and (if seeking to reflect gross development value), should ensure that this is supported by an independent RICS valuation, paid for by the applicant and commissioned by the local authority</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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Partly disagree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Developing sites via LA's using commuted sum monies is highly likely to be ;less efficient than developers delivering them alongside open market homes. LA's will also struggle to find available land to deliver, having allowed 100% open market development on land used by the developer to provide the commuted sum.</p> <p>In a similar vein to 67b, above, there may be certain limited circumstances where off-site contributions, (or off-site delivery) are</p>

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	<p>preferable owing to specific site characteristics (e.g. incorporating listed buildings, or lack of RP appetite on a certain site). In almost all circumstances, policy compliant on-site delivery should be prioritized by the local authority and should be the starting point for development proposals. However, where the circumstances above are relevant, off-site delivery may be agreed in negotiation with the local authority, with strong safeguards put in place to ensure that the affordable housing delivered on the other selected site produces better affordable housing outcomes</p>
<p>72) Do you agree the with the criteria set out regarding the locations of specialist housing for older people? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Partly agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Whilst the focus on ensuring that housing for older people and other forms of specialist provision are provided in appropriate locations is welcomed, further focus needs to be placed on the design of housing for older people, (in terms of access to green open space, and how internal design can be optimised in light of best practice). Moreover, it would be helpful to define ‘specialist community-based accommodation’, and to ensure that this accommodation is also built to appropriate M4(2) and/or M4(3) accessibility standards, dependent on the client group in question. Whilst this may be seen as a matter for a detailed planning consent, this guidance is silent on how technology and assistive aids could be used in schemes for older people and other specialist groups to help them maintain their independence- this feels like a missed opportunity to support system-wide change to the delivery of specialist accommodation</p>

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<p>73) Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Thought needs to be given to any vulnerable community in the existing locality.</p>
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	
<p>75) Do you agree the proposals provide adequate additional support for rural exception sites? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Strongly Disagree</p>
<p>a) Please provide your reasons, including what other changes may be needed to increase their uptake?</p>	<p>The introduction of 5% CAP on the size of an exception site in relation to the size of the existing settlement (HO10. Para 2) should not be implemented and should be removed from the new nppf as it will reduce affordable housing delivery.</p> <p>This CAP would mean, for example that a 250 house existing settlement would have a cap of 12 houses in an exception site –this</p>

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	<p>would inevitably have challenges with viability and lack of RP support – and likely mean that no houses would be provided as affordable housing exception sites in this type of scenario. This would particularly impact Rural Affordable Housing delivery and lead to many opportunities for rural affordable housing delivery being stopped. It should be left to the LPA and local communities to determine the appropriate sizes of exception site in individual locations. For example, an exception site going ahead of >5% could help ensure the vitality and sustainability of local services in the settlement (e.g pub, shop, school) - surely it would be counter-productive to stifle such opportunities with an arbitrary generic CAP.</p> <p>If no such cap is proposed for open market housing, then it shouldn't be imposed for affordable.</p>
<p>76) Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>First homes as a tenure type within a development of other tenures is fine but not as a discrete sole-tenure exception site.</p>
<p>77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable</p>	<p>Agree</p>

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homes? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?	£15k per plot may be a better figure for incentivising landowners to make land available as Affordable Housing Exception sites, especially in Rural areas.
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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree?
79) Please provide your reasons, particularly if you disagree.	
80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Disagree
a) Please provide your reasons, particularly if you disagree.	The policy has no teeth. Developers are likely to resist a shorter timescale and the LPA will be on the back foot trying to evidence that a shorter timescale will not threaten implementation or viability.
81) Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-	neither agree or disagree

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Consultation Question	<i>Cotswold District Council Response</i>
<p>use development is sufficient to ensure the opportunities of large scale development are supported? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	
<p>a) Please provide your reasons, particularly if you disagree.</p>	As above, the policy has no teeth
<p>82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? <i>Yes, no</i></p>	yes
<p>a) Please provide your reasons.</p>	Methods to avoid/stop developers controlling buildout rates to maximise profit.
<p>83) Do you agree with the proposed changes to the Housing Delivery Test rule book? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	?
<p>a) Please provide your reasons, particularly if you disagree.</p>	
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	neither agree nor disagree
<p>a) Please provide your reasons, particularly if you disagree.</p>	JW The focus on relevant strategies and facilitating development to meet the needs of a modern economy is welcome, but risks being undermined by clause 2 – a strategy driven approach needs to have

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Consultation Question	<i>Cotswold District Council Response</i>
	teeth, otherwise the engine rooms for growth, such as clusters and campus facilities may be repurposed to lower opportunity uses. Not sure what remit the LPA has to implement E11b
85) Do you agree with the approach to meeting the need for business land and premises in policy E2? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree
a) Please provide your reasons, particularly if you disagree.	
86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree
a) Please provide your reasons, particularly if you disagree.	
87) Do you agree with the approach to rural business development in policy E4? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree
a) Please provide your reasons, particularly if you disagree.	With regard to E4 1b, what is the definition of other land-based businesses?
88) Do you agree with the proposed changes to policy for planning for town centres? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree ?

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Consultation Question	Cotswold District Council Response
a) Please provide your reasons, particularly if you disagree.	
89) Do you agree with the approach to development in town centres in policy TC2? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree?
a) If not, please explain how you would achieve this aim differently?	
90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?	It hasn't protected retail uses in town and local centres
91) Do you believe the sequential test in policy TC3 should be retained? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree
a) Please provide your reasons, particularly if you disagree.	
92) Do you agree with the approach to town centre impact assessments in policy TC4? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Partially agree
a) Please provide your reasons, particularly if you disagree.	the default threshold of 2500 m ² is a large rural area.
93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?	strongly disagree

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Consultation Question	<i>Cotswold District Council Response</i>
<i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>the policy is confusing. LPA's do not have the expertise to determine the cumulative exposure of non-ionising radiation. CO1 1a and 2 seem at odds with one another and do not provide enough clarity to allow the local planning authority to scrutinise a proposal. Telecommunications infrastructure policies require a lot more clarity from government. There is a requirement in the validation requirements for an ICNIRP statement to be submitted confirming the proposals are within guidelines. I agree though, this is very technical and we would simply need to trust that the self-certification is correct.</p>
<p>94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>It should but .2 of the policy somewhat undermines this approach.</p>
<p>95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>but this information is rarely considered sufficient justification by local residents.</p>

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Consultation Question	<i>Cotswold District Council Response</i>
<p>96) Do you agree with the approach to planning for energy and water infrastructure in policy W1? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>agree</p>
<p>a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?</p>	<p>the onus needs to be on utility providers, regulators and network operators to pragmatically address allocations in development plans. At present there is no requirement for them to do so and in many cases, particularly with water companies, this will detrimentally impact housing delivery. By way of example Thames water have informed us that they will only consider upgrades to infrastructure once planning permission has been granted for development and that this process will on average take considerably longer to agree and implement than the lifetime of the planning permission.</p>
<p>97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>But, this is a specialised area which is unsupported by many LPA's. With regard to renewable electricity, significant work needs to be done to improve the ability for this to connect to the National Grid, which is outside of the control of the LPA. If this policy is to succeed, the national infrastructure grid has to be capable of supporting it. It is not at present.</p>

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Consultation Question	<i>Cotswold District Council Response</i>
<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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	agree
<p>a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.</p>	but comments made in relation to 97 a still apply stop
<p>99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	agree
<p>a) Please provide your reasons, particularly if you disagree.</p>	but what is the reason why these upgrades are so few and far between.
<p>100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	neither agree nor disagree
<p>a) Please provide your reasons, particularly if you disagree.</p>	
<p>101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas? <i>Strongly agree,</i></p>	neither agree nor disagree

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Consultation Question	<i>Cotswold District Council Response</i>
<i>partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
a) Please provide your reasons, particularly if you disagree.	
102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of 'minerals of national and local importance'? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree
a)	Please provide your reasons, particularly if you disagree.
105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? <i>Strongly</i>	neither agree nor disagree

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Consultation Question	<i>Cotswold District Council Response</i>
<i>agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
106) Please provide your reasons, particularly if you disagree.	
107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree
108) Please provide your reasons, particularly if you disagree.	
109) Do you agree with approach to coal, oil and gas in policy M5? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
110) Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No	?
111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.	
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	neither agree nor disagree

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Consultation Question	<i>Cotswold District Council Response</i>
development? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
a) Please provide your reasons, particularly if you disagree.	
113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree?
115) If not, what further guidance is needed?	
116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree?
a) Please provide your reasons, particularly if you disagree.	
117) Do you agree policy L2 identifies appropriate typologies of development to support intensification? <i>Strongly</i>	agree?

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Consultation Question	<i>Cotswold District Council Response</i>
<i>agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
a) If not, what typologies should be added or removed and why?	?
118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	disagree
a) Please provide your reasons, particularly if you disagree.	it is not always appropriate to fill gaps in existing roof lines, particularly in conservation areas or adjoining listed buildings.
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. <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	disagree
a) Please provide your reasons, particularly if you disagree.	this type of national policy may not be appropriate to many local and rural contexts.
120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree

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Consultation Question	<i>Cotswold District Council Response</i>
a) Please provide your reasons, particularly if you disagree.	twice the footprint of the existing building on the site could be significant and out of context. It would be better if this element of the policy was removed
121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	disagree
a) If not, please explain how guidance could be clearer?	it is appropriate that the existing character of an area should be given significant weight rather than just being taken into account. Any new development needs to assimilate itself into its location and not jar, particularly if the development process is attempting to build communities. At present the wording of L3 2 suggests that the existing character of an area can be easily disregarded.
122) Do you agree with the minimum density requirements set out within policy L3? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	minimum densities still need to have consideration to the local context and character. High density development near railway stations could just create commuter development which provides little additional value to the local community.
b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected	?

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Consultation Question	<i>Cotswold District Council Response</i>
characteristics? Please provide your reasons, including any evidence	
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	agree
a) Please provide your reasons, particularly if you disagree.	
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	agree Note: The well-connected station footnote would exclude Moreton in Marsh because that does not have four trains per hour overall or two trains per hour in any one direction.
a) Please provide your reasons and preferred alternatives.	
<p>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? <i>Yes/No</i></p>	?
a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?	?

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Consultation Question	<i>Cotswold District Council Response</i>
126) Should we define a specific range of residential densities for land around stations classified as 'well-connected'?	No but the policy could suggest the level of density currently proposed as long as this was subject to other reasonable place making considerations
127) If so, what should that range be, and which locations should it apply to?	
128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	disagree
129) Please provide your reasons, particularly if you disagree.	the word height should be added to scale and form and materials. Also, does footnote 46 not cause implications for houses that have already been subject to large previous extensions?
130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	?
131) Please provide your reasons, particularly if you disagree.	
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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	?

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Consultation Question	<i>Cotswold District Council Response</i>
a) Please provide your reasons, particularly if you disagree.	
133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	consideration needs to be given to noise, particle and other pollution in close proximity to train stations and lines.
134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree Same approach as current NPPF, which is supportable.
135) Please provide your reasons, particularly if you disagree.	
136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree
a) Please provide your reasons, particularly if you disagree.	
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	neither agree nor disagree

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Consultation Question	<i>Cotswold District Council Response</i>
<p>development capable of meeting the density requirements in chapter 12? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	
<p>138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.</p>	?
<p>139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Partly agree
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Subject to the Government introducing the new process linked with viability and the Golden Rules, the proposals set out in GB8 sounds sensible, however, the Government should be mindful of developers seeking to reduce affordable housing contributions through these mechanisms, especially on c), where developers may seek to pursue one option (at outline) before then pursuing a different development model at reserved matters to subsequently trigger a viability assessment and seek to reduce the delivery of on-site affordable housing</p>
<p>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?</p>	?

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Consultation Question	<i>Cotswold District Council Response</i>
<p>141) Do you agree with setting an affordable housing 'floor' for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>agreed but it would be simpler to set it at 50%</p>
<p>142) Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?</p>	<p>the easiest approach is to set it at 50%, as this will not be far off the +15% suggested in paragraph ii</p> <p>Do not agree with a cap of 50% for affordable housing –rather than a floor and a cap why not just say that in these circumstances 50% Affordable Housing is required as a minimum.</p> <p>Of the two options proposed, the Government should look to implement a mix of a) and b). To boost the delivery of social rent, a set proportion of social rent should be included on the site, however, to ensure that mixed and balanced communities are generated, the levels should be set in line with local circumstances, mirroring local plan requirements.</p>
<p>143) Do you agree with local planning authorities testing viability at the plan-making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>agree</p>
<p>a)</p>	

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Consultation Question	<i>Cotswold District Council Response</i>
<p>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?</p>	<p>The use of BLV's can be a good mechanism for 'controlling' Hope Value from Landowners/Developers who hold on the suitable sites in the 'hope' that they will get a windfall land value from a planning gain for residential over existing use. The risk is that setting BLV's too low will stifle sites being made available for development. On balance it is considered better to implement BLV's but with the flexibility to reassess their success in promoting development later down the line.</p>
<p>145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>disagree? I can't find the relevant footnote 7?</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>disagree that only a b and d of policy GB our relevant to designating greenbelt is grey belt</p>
<p>146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>N/A</p>

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Consultation Question	<i>Cotswold District Council Response</i>
147) Do you agree with the approach to design tools set out in policy DP2? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree
a) Please provide your reasons, particularly if you disagree.	N/A
148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Partly agree
a) Please provide your reasons, particularly if you disagree.	<p>Whilst the continued focus on promoting social interaction and promoting mixed, vibrant and integrated communities is welcomed, further additions should be made to Policy DP3 to require that homes and buildings (rather than just public space) are accessible and inclusive. This would tie in with the previously suggested approach of mandating the delivery of 100% M4(2) homes with some minor exemptions</p> <p>With regard to DP3(f) that states "promote compact forms of development to optimise the site's potential". Density of development should be responsive and sympathetic to the site and its setting. The concern is this policy could be used to justify inappropriate dense forms of development in the wrong context</p>
149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? <i>Strongly</i>	agree

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Consultation Question	<i>Cotswold District Council Response</i>
<i>agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
a) If not, what else would help secure better design and placemaking outcomes?	N/A
150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan-making? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree?
a) Please provide your reasons, particularly if you disagree.	
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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree?
a) Please provide your reasons, particularly if you disagree.	this remains extremely hard to deliver in rural areas
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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree?
a) Please provide your reasons, particularly if you disagree.	?

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Consultation Question	<i>Cotswold District Council Response</i>
<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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	agree?
<p>a) Please provide your reasons, particularly if you disagree.</p>	?
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	agree?
<p>a) Please provide your reasons, particularly if you disagree.</p>	
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	agree?
<p>a) Please provide your reasons, particularly if you disagree.</p>	?
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	neither agree nor disagree

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Consultation Question	<i>Cotswold District Council Response</i>
a) Please provide your reasons, particularly if you disagree.	
<p>157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	strongly agree
a) Please provide your reasons, particularly if you disagree.	
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree?
a)	Implementation of the policy involves a significant amount of expertise which may not be available to the local planning authority?
<p>159) Do you agree that Local Green Space should be 'close' to the community it serves? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	?
a) Please provide your reasons, particularly if you disagree.	should we be concerned about reference to a local green space not being an extensive tract of land if this is undefined?
<p>160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public</p>	?

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Consultation Question	<i>Cotswold District Council Response</i>
<p>service infrastructure serving new development? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	
<p>a) Please provide your reasons, particularly if you disagree.</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>agree but how does the LPA evidence that such local health pollution or antisocial behaviour as part of the processing and within the time limits of a normal planning application?</p>
<p>162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Strongly Disagree.</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Not sure how I feel about the use of the phrase 'established services that are used on a frequent basis' in point 2. Does this mean if it is not used i.e. because it is closed', the policy does not apply? It also suggests that it only applies to facilities that ar the last of thier type in the area concerned. Some villages have a couple of pubs and we have tried very hard to maintain both, this would entirely undermine this. Also what about towns like Cirencester? Is the 'area concerned' the entire town, parts of the town? How is this defined?</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?</p>	<p>agree.</p>

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Consultation Question	<i>Cotswold District Council Response</i>
<i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
a) Please provide your reasons, particularly if you disagree.	Generally no objection, however, how is informal play space defined? We often get objections on the grounds that vacant fields are used for children to play, but this is not designated. Would this constitute informal play space and could this then block development within settlements?
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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree?
a) Please provide your reasons, particularly if you disagree.	
165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	agree?
a) Please provide your reasons, particularly if you disagree.	
166) Are any additional tools or guidance needed to enable better decision-making on contaminated land?	?

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Consultation Question	<i>Cotswold District Council Response</i>
<p>167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree?
<p>a) Please provide your reasons, particularly if you disagree.</p>	?
<p>168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	agree.
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>The policy specifically suggests information should be submitted up front and then agreed mitigation secured through conditions or obligations. This is not included within the national validation requirements though.</p>
<p>169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree?
<p>170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree?
<p>a) Please provide your reasons, particularly if you disagree.</p>	

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Consultation Question	<i>Cotswold District Council Response</i>
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	neither agree nor disagree
<p>a) Please provide your reasons, particularly if you disagree.</p>	
<p>172) Do you agree with the proposed clarifications to the sequential test set out in policy F5? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree?
<p>a) Please provide your reasons, particularly if you disagree.</p>	
<p>173) Do you agree with the proposed approach to the exception test set out in policy F6? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree?
<p>a) Please provide your reasons, particularly if you disagree</p>	
<p>174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree
<p>a) Please provide your reasons, particularly if you disagree.</p>	
<p>175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting</p>	agree.

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Consultation Question	<i>Cotswold District Council Response</i>
and re-naturalisation of river channels? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	
a) Please provide your reasons, particularly if you disagree.	No objection – but should lifetime of the development explicitly include the construction period?
176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	neither agree nor disagree
a) Please provide your reasons, particularly if you disagree.	
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?	no
178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Agree?
a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.	Agree?

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Consultation Question	<i>Cotswold District Council Response</i>
<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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Strongly disagree.</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>It is important to retain the term 'measurable' biodiversity net gain in Policy N1(2). Without this, there is a risk that developments exempt from measurable net gains may not follow the mitigation hierarchy, potentially leading to the loss of on-site features and habitats that hold greater intrinsic ecological value.</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 evidence demonstrates that the local authority in question has biodiversity levels significantly more depleted than those of neighbouring counties.</p>
<p>181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	

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Consultation Question	<i>Cotswold District Council Response</i>
<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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Strongly disagree</p> <p>Need to give great weight to conserving National Landscapes in plan making.</p> <p>For Cotswold, where about 80% of the district is within the Cotswolds National Landscape. The Framework should recognize that National Landscapes are a fundamental constraint in plan making which affects meeting housing need "in full".</p>
<p>a) Please provide your reasons, including how policy can be improved to ensure compliance.</p>	<p>?</p>
<p>183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Strongly disagree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>Policy N6 appears to remove protection for potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on habitat sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites. Similarly, the protection provided by</p>

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Consultation Question	<i>Cotswold District Council Response</i>
	paragraph 195 of the NPPF (2024) seems to be removed from the draft NPPF.
184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?	?
185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	strongly agree
a) Please provide your reasons.	It is consistent with the Planning (Listed Building & Conservation Act) 1990 and will help sustain the historic environment for the benefit of current and future generations.
186) Do you have any evidence as to the impact of implementing the additional regard duties for development?	No.
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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Partly agree.
a) Please provide your reasons, particularly if you disagree.	HE2(1(a)) opens: 'Identify opportunities for development affecting these assets to enhance or better reveal their significance', given the sensitive nature of most heritage assets, a slightly more nuanced wording would be preferable, such as: 'identify any opportunities for

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Consultation Question	<i>Cotswold District Council Response</i>
	development affecting these assets that could enhance or better reveal their significance'.
<p>188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	strongly agree.
<p>a) Please provide your reasons, particularly if you disagree.</p>	this is a reasoned approach that accords with Historic England's advocated methodology.
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	partly disagree.
<p>a) Please provide your reasons, particularly if you disagree.</p>	Whilst the consistent use of 'substantial' for weighting across the document is beneficial for consistency and comparison, from a pragmatic perspective, the word 'substantial' is already used in relation to harm, where it has a specific meaning. It is clearer to use a different word for the harm and weighting, rather than using 'substantial' again, which becomes repetitious, less clear and potentially more confusing for applicants; for example, when 'substantial weight' is given to harm that is below the 'substantial harm' threshold. Perhaps both consistency and clarity would be

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Consultation Question	<i>Cotswold District Council Response</i>
	served by using 'substantial weight', but in changing 'substantial harm' to 'considerable harm'.
<p>190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	partly agree.
<p>a) Please provide your reasons, particularly if you disagree.</p>	Policy HE10(1) states that 'an appropriate investigation of the asset's significance and the potential effect on this should be undertaken to identify the design of the development proposal, mitigation and implementation of the development'... the word 'identify' here makes little sense; 'inform' would be clearer.
<p>191) Do you have any other comments on the revisions to the heritage chapter?</p>	The interaction between Policy HE6 & Policy CC2(2). The latter states that: Substantial weight should be given to the benefits of improving the energy efficiency of existing buildings'; there is nothing here to differentiate between designated heritage assets and other buildings. This could help clarify potential confusion of this 'substantial weight' being balanced against the 'substantial weight' given to conserving an asset from harm that is below the 'substantial harm' threshold. This could also be alleviated by changing 'substantial harm' to 'great harm' or 'considerable harm'.
<p>192) Do you agree with the transitional arrangements approach to decision-making? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	Agree?
<p>a) Please provide your reasons, particularly if you disagree.</p>	?

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Consultation Question	<i>Cotswold District Council Response</i>
<p>193) Do you have any further thoughts on the policies outlined in this consultation?</p>	<p>Need to mention the shortcomings of annex C here for somewhere else in this response.</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 consultation? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Agree?</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>neither agree nor disagree</p>
<p>a) Please give reasons.</p>	
<p>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? <i>Yes/No</i></p>	<p>No, likely to be very unpopular with local communities</p>
<p>a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.</p>	

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Consultation Question	<i>Cotswold District Council Response</i>
197) Do you have any views on how we should define 'co-located energy infrastructure'? Please provide your reasons.	?
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? <i>Yes/No</i>	?
a) Please provide your reasons.	
199) What benefits or risks do you foresee from making this change? Please provide your reasons.	risk to landscape character, risk to loss of agricultural land for a considerable period of time
200) Would you support the use of growth testing for strategic, multi-phase schemes? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	?
201) Would you support the optional use of growth testing for regeneration schemes? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	?
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 speed and certainty? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Using a single figure (17.5% mentioned) for Developers return rather than a range (15%-20%) will not have a material difference in the speed and certainty of development as the viability process will be relatively unaffected and will still be required.

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Consultation Question	<i>Cotswold District Council Response</i>
<p>a) 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>?</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>The use of return on GDV is too simplistic. What may be more helpful is a model which considers risks allocation/public purse contributions/etc as well as developers profit. For example a 12% projected return on a project that has been derisked by Public sector money (e.g infrastructure delivery or grant) may be more attractive for a developer to implement than a projected 20% return on a high risk project. Any new model should also provide for a reassessment of costs/values/return and an opportunity for clawback if the developer has made a premium profit over that projected initially. This could include a gainshare for the developer.</p>
<p>a) 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>Typically a profit of 6% is assumed for the affordable housing element on developments in Gloucestershire where the full affordable housing element cannot be viably delivered on site- so setting this as a national expectation or requirement should help to reduce negotiation and thereby speed up decision making.</p> <p>This may help for 100% Affordable Housing Schemes but it seems too simplistic for open market schemes – see comments above</p>

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Consultation Question	<i>Cotswold District Council Response</i>
<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, reducing the need for subjective expectations?</p>	<p>The use of BLV's in conjunction with a viability model which considers risks allocation/public purse contributions/etc as well as developers profit. For example a 12% projected return on a project that has been derisked by Public sector money (e.g infrastructure delivery or grant) may be more attractive for a developer to implement than a projected 20% return on a high risk project. Any new model should also provide for a reassessment of costs/values/return and an opportunity for clawback if the developer has made a premium profit over that projected initially. This could include a gainshare for the developer.</p>
<p>a) Please explain your answer.</p>	<p>see above</p>
<p>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?</p>	<p>Using GDV alone is too simplistic</p>
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>The use of return on GDV is too simplistic. What may be more helpful is a model which considers risks allocation/public purse contributions/etc as well as developers profit. For example a 12% projected return on a project that has been derisked by Public sector money (e.g infrastructure delivery or grant) may be more attractive for a developer to implement than a projected 20% return on a high risk project. Any new model should also provide for a reassessment of costs/values/return and an opportunity for clawback if the developer</p>

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Consultation Question	<i>Cotswold District Council Response</i>
	has made a premium profit over that projected initially. This could include a gainshare for the developer.
a) Please explain your answer.	see above
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?	See comments above
a) Please explain your answer.	
208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	Strongly Agree
a) In what circumstances might a premium, or the usual premium, not be required?	<p>To compliment the previous response to question 203 and reflect the comparatively lower risks associated with greenbelt and greybelt sites, guidance should be updated to reflect that, in these circumstances, a premium should not be required to promote landowners to bring forwards development, or for developers to bring forwards development (if they own the land).</p> <p>No or limited alternative uses</p> <p>Significant 'abnormals' on the land which will increase development costs</p>

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Consultation Question	<i>Cotswold District Council Response</i>
	<p>Landowner benefitting from Development in some other way (e.g profit sharing/property gain as part of development/improved infrastructure or access for other adjacent ;land)</p> <p>Use of BLV's would help with the premium issue.</p>
<p>b) What impact (if any) would you foresee if this change were made?</p>	<p>Helping Landowners understand the lack of hope vale, the lack of alternative income uses for the land and the benefits of bringing the labd forward for development with a predetermined gain and more limited risk.</p>
<p>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? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>agree</p>
<p>a) Please explain your answer.</p>	<p>?</p>
<p>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? <i>Decision maker discretion / Another metric / Neither</i></p>	<p>Decision maker discretion (acting reasonably)</p>
<p>a) If another metric, please set out your preferred approach and rationale.</p>	<p>N/A</p>

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Consultation Question	<i>Cotswold District Council Response</i>
<p>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?</p>	<p>by stating this explicitly in policy</p>
<p>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. <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>agree</p>
<p>a) Please explain your answer.</p>	
<p>213) Do you agree that a 2.5 hectare threshold is appropriate? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>This is in relation to the definition of medium development. I have no issue with this threshold. Does anyone else? Agree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	
<p>214) Do you agree that a unit threshold of between 10 and 49 units is appropriate? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i></p>	<p>Strongly Disagree</p>
<p>a) Please provide your reasons, particularly if you disagree.</p>	<p>In the event, as is indicated in the planning reform working paper, the Government seeks to remove or reduce affordable housing contributions on sites of 10-49 units, clearly, this approach would lead to the overall reduction in affordable housing delivery, which will undermine the Government's commitment to delivering affordable</p>

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Consultation Question	<i>Cotswold District Council Response</i>
	housing at scale. Whilst the proposal to introduce a medium sites category of 10-49 homes is logical, this should not be accompanied with any option to remove or reduce affordable housing delivery as standard
215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development? <i>Yes/No.</i>	Yes
216) If so, please explain you answer and provide views on potential mitigations.	
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 purpose-built student accommodation?	If the small development exemption relates to affordable housing, no it should not be increased. I believe that 50 dwellings relates to all housing not just affordable housing.
a) Please provide your reasons.	
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?	I do not understand the context of this question does anyone else? They are asking if 120 student beds should be considered as equivalent to 50 homes for the purpose of levy exemption – not sure this has a big impact on CDC, Personally I would agree.
a) Please provide your reasons.	
219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the	

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Consultation Question	<i>Cotswold District Council Response</i>
existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.	No wider metrics required.
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.	?
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.	?
222) Do you agree with the proposal to extend the Permission in Principle application route to medium development? <i>Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.</i>	strongly disagree
a) Please provide your reasons, particularly if you disagree.	this type of permission seems to have little benefit and is confusing for some applicants and most local communities.
223) Do you have views about whether there should be changes to the 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?	no

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Consultation Question	<i>Cotswold District Council Response</i>
a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.	not applicable
225) Is there anything that could be done to mitigate any impact identified?	not applicable