

# Drighlington Parish Council formal response

Approved 16/02/2026

## 10.c4 NPPF Consultation Responses

	Question	Parish Led Response
Q1	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?	Support with safeguards The PC emphasises that NDMPs must not override local distinctiveness. Implementation must include clear safeguards ensuring rural parishes retain meaningful influence over local policy.
Q2	Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree.
	a) Please provide your reasons, particularly if you disagree.	The PC supports clear separation <b>only if</b> the new structure does not diminish the weight of local plans in rural contexts.
Q3	Do you agree with the proposed set of annexes to be incorporated into the draft Framework? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Neither agree nor disagree. The PC is cautious. Annexes must remain concise and not dilute core policy clarity or expand national policy by the back door.
Q4	Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	The PC does not object in principle but stresses that local circumstances, cumulative impact, and infrastructure capacity must remain central to policy application.
Q5	Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree)	Partly Agree. The PC supports clarity provided it does not reduce the ability of decision-makers to apply nuanced judgement.
Q6	Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly Disagree. The PC stresses that SDSs must not be used to impose urban housing pressures onto rural settlements without appropriate infrastructure.
Q7	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? (Strongly agree, partly agree, neither agree	Partly Agree. The PC supports regular review but insists this should be <i>needs-based</i> rather than an automatic requirement.

	nor disagree, partly disagree, strongly disagree.)	
Q8	If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Neither agree nor disagree. The PC prefers a model triggered by <b>significant change</b> , ensuring stability for communities and plan-making.
Q9	Do you agree with the role, purpose and content of local plans set out in policy PM2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Neither agree nor disagree. The PC supports continuity <b>only where</b> it avoids speculative development and protects areas with constrained capacity.
Q10	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	Partly agree. The PC agrees broadly but demands explicit recognition of the role of parish-level evidence and neighbourhood plans.
Q11	Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. The PC supports long-term planning but warns that forecasts beyond 15 years risk becoming inaccurate for small settlements. Any prohibition on duplication must <b>not</b> prevent locally justified rural detail where national policies are urban-centric; PM6 should expressly permit <i>rural-specific</i> criteria where evidence shows capacity constraints.
Q12	Do you agree with the approach to initiating plan-making in PM7? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. THE PC supports a 10-year minimum with mandatory mid-term review triggers.
Q13	Do you agree with the approach to the preparation of plan evidence set out in policy PM8? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	THE PC warns that avoiding duplication must not prevent local authorities from adding locally necessary detail.
Q14	Do you agree with the approach to identifying land for development in PM9? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	THE PC supports clear processes but notes that delays by principal authorities disproportionately impact rural communities.
Q15	Do you agree with the policies on maintaining and demonstrating cross boundary cooperation set out in policy PM10 and policy PM11? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	THE PC strongly supports proportionate, locally relevant evidence and requests that rural constraints receive explicit recognition.

Q16	Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	THE PC insists that environmental capacity, heritage, transport constraints and village character must be primary considerations.
Q17	Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	THE PC supports cooperation but warns that rural areas must not become the default “solution” to neighbouring authorities’ unmet need.
Q18	Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	THE PC welcomes greater clarity, provided that developer contributions match real infrastructure needs, not minimum national guidance.
Q19	Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	THE PC supports local determination but asks for stronger national requirements to prevent authorities avoiding timely reviews.
Q20	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?	THE PC strongly supports the ability to set higher local standards, particularly relating to design quality, sustainability, climate resilience, and rural distinctiveness.
Q21	Do you agree with the principles set out in policy DM1? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While some principles are reasonable, the PC is concerned that DM1 could weaken local discretion, potentially making it harder to resist unsuitable development that impacts rural character.
Q22	Do you agree with the policy DM2 on information requirements for planning applications? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. Clearer information requirements are welcome, but the PC stresses that rural areas need comprehensive assessments (e.g., landscape impact, infrastructure capacity) to avoid harmful development.
Q23	Do you have any views on whether such a policy could be better implemented through regulations?	Yes — but only if regulations strengthen the ability to require full and detailed evidence in sensitive rural parishes. Any reduction in local discretion would be strongly opposed.
Q24	Do you agree with the principles set out in DM3? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC believes DM3 may inadvertently dilute local control, making it harder to tailor decision-making to rural constraints.
Q25	Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed? (Strongly agree,	Partly disagree. The PC is concerned that reduced negotiation could prevent the parish from securing necessary mitigation or infrastructure contributions.

	partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	
Q26	Do you have any further comments on the likely impact of policy DM5: Development viability?	The PC fears DM5 may encourage developers to minimise contributions, worsening existing pressures on rural roads, drainage, and community facilities.
Q27	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?	Modifications must not weaken mitigation measures or reduce community benefits. The PC emphasises that S106A should not become a route for developers to “chip away” at obligations.
Q27a	If so, please provide views on specific changes that may improve the efficacy of S106A and the main obstacles that result in delay when seeking modification of planning obligations.	The main obstacle is developers seeking to reduce obligations post-permission. Stronger safeguards must be introduced to protect local infrastructure contributions.
Q28	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.	Any interim changes must prioritise protection of affordable housing contributions, not expedience for developers.
Q28a	If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations.	The PC is concerned that s73 is sometimes used to reduce affordable housing or avoid design constraints — a trend the PC strongly opposes.
Q29	Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports clarity but strongly opposes losing local tailoring, which is vital in rural settings.
Q30	Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. Clarification is helpful, but planning must still consider cumulative impacts that may sit between regimes.
Q31	Do you agree with the new intentional unauthorised development policy in policy DM8? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. Intentional unauthorised development undermines public trust and disproportionately affects rural communities.
Q32	Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider?	The PC highlights harms such as: <ul style="list-style-type: none"> <li>irreversible landscape damage,</li> <li>pressure on rural infrastructure,</li> <li>loss of trust in the planning system.</li> </ul>
Q33	Do you agree with the new Article 4 direction policy in policy DM10? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC is concerned that restrictions on Article 4 could limit the parish’s ability to prevent harmful permitted development changes.
Q34	Do you agree with the proposed approach to setting a spatial strategy in development plans? (Strongly agree, partly	Strongly disagree. The PC fears that the spatial strategy approach could impose unwanted growth on rural settlements.

	agree, neither agree nor disagree, partly disagree, strongly disagree.)	
Q35	Do you agree with the proposed definition of settlements in the glossary? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The definition risks oversimplifying small rural communities, increasing development pressure.
Q36	Do you agree with the revised approach to the presumption in favour of sustainable development? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree)	Strongly disagree. The PC maintains that “presumption” continues to tilt outcomes in favour of development, even where infrastructure is insufficient.
Q37	Do you agree to the proposed approach to development within settlements? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC opposes policies that intensify development within small settlements already under pressure. Policy <b>S4(1)</b> presumes approval <i>within settlements</i> unless adverse effects <b>substantially outweigh</b> benefits. For small villages with narrow lanes, limited buses and drainage pinch-points, we consider those adverse effects routinely outweigh benefits.
Q38	Do you agree to the proposed approach to development outside settlements? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC wants strong controls on development outside settlements to avoid sprawl, landscape harm, and loss of agricultural land. Policy <b>S5</b> restricts development <i>outside settlements</i> to listed categories and adds a station-adjacent route ( <b>S5(1)(h)</b> ). In our context, station-proximate land still relies on cars; the <b>adverse effects</b> on character and infrastructure would <b>substantially outweigh</b> benefits.
Q39	Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree. Only essential rural uses should be allowed. The PC opposes broad categories that could facilitate speculative development.
Q39a	Please provide your reasons.	The PC stresses: <ul style="list-style-type: none"> <li>• protection of rural landscape,</li> <li>• limited road capacity,</li> <li>• safeguarding agricultural land,</li> <li>• preventing incremental expansion.</li> </ul>
Q40	Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC believes station-focused intensification is inappropriate in rural areas where transport capacity and village character must be protected.
Q40a	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.	The PC highlights that mass housing near stations in rural areas risks: <ul style="list-style-type: none"> <li>• urbanising rural environments,</li> <li>• displacing vulnerable groups,</li> <li>• creating car-dependent overspill.</li> </ul>

		Even where <b>'well-connected'</b> is met, the footnote definition relies on frequency and economic geography rather than <b>walkable services</b> ; our station lacks footways, healthcare and shops within safe walking distance, so intensification would <b>urbanise</b> a rural setting.
Q41	Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy? 35 (Strongly agree, partly agree, neither agree or disagree, partly disagree, strongly disagree.)	Strongly disagree. Neighbourhood plans should not be obliged to allocate housing. The PC maintains that communities should retain full discretion, especially where infrastructure or landscape capacity is limited. Policy <b>S6</b> limits the neighbourhood-plan protection to plans with allocations. Requiring small parishes to allocate undermines community control where <b>infrastructure capacity is demonstrably absent</b> .
Q42	Do you agree with the approach to planning for climate change in policy CC1? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports addressing climate change but believes CC1 could impose requirements that unintentionally pressure rural parishes to accept growth or infrastructure changes inappropriate for their setting.
Q43	Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While supportive of climate mitigation, the PC stresses that CC2 must not be used to justify development in rural areas that cannot absorb increased housing or infrastructure.
Q43a	If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?	The PC would welcome measures that allow councils to reject proposals where climate mitigation claims are used to justify otherwise inappropriate development.
Q44	Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports adaptation measures but is concerned CC3 could enable developers to argue that new development is "resilient," even in unsuitable rural locations.
Q44a	What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?	Guidance must make clear that adaptation measures do <b>not</b> override local environmental constraints or justify new development on sensitive land.
Q45	Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC considers the guidance too vague and believes wildfire risks must not be used as a pretext for introducing urban-style design features into rural settings.
Q45a	Please provide your reasons	The PC stresses that wildfire policy must reinforce landscape protection, not encourage clearance or suburbanisation.
Q46	How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?	The PC insists wildfire measures must respect rural identity — avoiding hard landscaping, fencing types or vegetation removal that detracts from the parish's character.
Q47	Do you have any other comments on actions that could be taken through national planning policy to address climate change?	Climate actions should prioritise supporting existing communities, not expanding settlements or permitting greenfield development under the banner of sustainability.

Q48	Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree. The PC is concerned that HO1/HO2 may compel growth in rural parishes regardless of capacity or infrastructure constraints.
Q49	Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree. While supportive of meeting needs, the PC warns that new guidance must not be used to justify additional housing allocations in small rural settlements.
Q50	If so, what elements should this guidance cover?	Guidance should emphasise that small rural parishes often lack suitable sites, transport, and infrastructure to support larger or specialist housing.
Q51	Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree. The PC stresses that any guidance must consider constraints of rural villages and avoid imposing disproportionate requirements locally.
Q51a	If so, what are the key principles this guidance should establish?	Assessments must prioritise local environmental constraints, road capacity, and community cohesion.
Q52	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 41 local plan 5-year housing land supply? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC is concerned that buffers could inflate housing targets in constrained rural parishes.
Q53	Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC opposes the continued use of mechanisms that place speculative pressure on rural communities due to perceived under-delivery.
Q54	Do you agree the requirements to establish a 5-year supply of deliverable traveller sites and monitor delivery are sufficiently clear? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC believes rural villages lack capacity and infrastructure for additional traveller provision beyond existing commitments.
Q55	Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC firmly opposes any policy that facilitates major development near small rural settlements.
Q56	Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable	Partly disagree. The PC supports affordable housing for local needs but

	housing? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	fears this change could unintentionally increase development pressure.
Q57	Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While supporting accessible homes, the PC warns that this requirement must not justify new large allocations in rural areas.
Q58	Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. Rigid requirements risk forcing inappropriate development scale within small parishes.
Q59	Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC fears this may result in intensified development or subdivision of sites in rural areas
Q60	Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. Large sites of 150+ homes are inappropriate in rural parishes, regardless of tenure mix.
Q60a	Please provide your reasons and indicate if an alternative site size threshold would be preferable?	The PC asserts that no threshold allowing major sites is appropriate for rural villages; development should remain small-scale and locally justified.
Q61	Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC maintains that parcels of 1–2.5ha would dramatically alter the parish’s character and are wholly unsuitable. <b>HO6(1)(a)</b> asks for <b>10%</b> of supply on sites ≤1ha and an extra <b>10%</b> on <b>1–2.5ha</b> sites. In villages, <b>1–2.5ha</b> parcels can exceed local grain; we request explicit rural <b>opt-downs</b> where character and drainage capacity show harm.
Q62	Are any changes to policy HO7 needed to ensure that substantial weight is given to meeting relevant needs?	Any changes must not override local capacity constraints or force additional development into rural settlements.
Q63	Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered 45 as part of affordable housing requirements, will successfully enable the provision of military homes? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC recognises service families’ needs but is concerned that broadening the definition could increase pressure for development in unsuitable rural areas.
Q64	Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable	Partly disagree. The PC fears that flexibility may be used to justify larger or denser development in rural parishes.

	housing? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	
Q65	Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While social rent is important, the PC opposes any requirement that increases housing numbers or creates pressure for larger sites in rural settings.
Q65a	If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?	No minimum should apply in rural parishes. Schemes should be based solely on clearly evidenced local need, not nationally prescribed thresholds.
Q66	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?	No minimum should apply in rural parishes. Schemes should be based solely on clearly evidenced local need, not nationally prescribed thresholds.
Q66a	If so, what changes would be beneficial?	Must ensure rural areas are not targeted for temporary accommodation due to lower land values or perceived available space.
Q67	Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC opposes cash-in-lieu arrangements which risk losing onsite affordable homes and encouraging developments that do not meet local need.
Q67a	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.	If permitted at all, cash-in-lieu must be strictly controlled and never used to justify development in sensitive rural landscapes (including former Green Belt).
Q67b	If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash contributions in lieu of on-site delivery should be permitted in certain circumstances – for example where it could be evidenced that onsite delivery would prevent a scheme from being delivered? Please explain your answer	The PC remains opposed. If allowed, it must be in exceptional cases and <b>never</b> in areas with limited local affordable housing delivery mechanisms.
Q68	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).	Risks outweigh benefits. The PC believes commuted sums could inflate land values, encourage speculative schemes, and undermine rural affordable housing delivery.

Q69	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.	Guidance must ensure money is spent <b>only</b> within the parish or immediate locality, preventing displacement of rural need to urban centres.
Q70	Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu?	If cash-in-lieu continues (which the PC opposes), calculations must be fully transparent and reflect the <i>full</i> value of providing homes locally.
Q70a	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 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.	Guidance must ensure rural parishes are not financially disadvantaged by developers choosing offsite solutions elsewhere.
Q71	Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. Offsite delivery risks removing affordable homes from rural parishes entirely.
Q72	Do you agree with the criteria set out regarding the locations of specialist housing for older people? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports appropriate accommodation for older residents but emphasises that rural parishes often <b>lack the healthcare access, public transport, footpath connectivity, and service infrastructure</b> required to support specialist housing safely. The Council strongly opposes any policy that could pressure small rural villages to provide such accommodation where it would create unsustainable or isolated living conditions. <b>HO9(a)</b> expects proximity to frequently used services by walking/wheeling; our settlement lacks those services within safe distances, so specialist housing would be <b>isolated</b> in practice.
Q73	Do you agree with the criteria set out regarding the locations of community based specialist accommodation, including changes to the glossary? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports specialist care but warns that rural locations often lack services and transport required for such accommodation.
Q74	Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. These forms of accommodation are inappropriate in rural parishes and risk distorting community balance.

Q75	Do you agree the proposals provide adequate additional support for rural exception sites? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports limited local-need affordable housing but fears the policy may widen opportunities for development beyond what is appropriate. Support <b>HO10</b> <i>only where</i> exception sites: <b>adjoin</b> settlements, are <b>≤1ha</b> or <b>≤5%</b> of settlement size, and are a <b>majority affordable</b> — otherwise creep risks eroding rural identity.
Q75a	Please provide your reasons, including what other changes may be needed to increase their uptake?	Exception sites must remain <b>strictly tied to proven local need</b> , with strong protections against market housing creep.
Q76	Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. The PC supports removing flexibility that could lead to increased development pressure in rural areas. However, it maintains that <b>any</b> exception-site policy must remain tightly controlled and tied to genuine local need.
Q77	Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While affordable housing for local families is supported, the PC warns that setting benchmark land values could <b>encourage land speculation</b> , putting pressure on rural areas to release more land than is sustainable.
Q77a	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?	Any value set must be <b>low enough</b> to prevent speculative interest and ensure sites remain genuinely for local-need affordable housing, not developer profit. The PC prefers the <b>most restrictive</b> benchmark available.
Q78	Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC is concerned that the policy may still place disproportionate expectations on rural authorities where roads, utilities, and services are insufficient to support additional provision. In rural parishes with limited road capacity and few services, <b>HO12</b> criteria support refusal of poorly located proposals and argue for <b>distributed, serviced</b> provision at appropriate locations.
Q79	Please provide your reasons, particularly if you disagree.	The PC emphasises: <ul style="list-style-type: none"> <li>• limited road capacity,</li> <li>• lack of public transport,</li> <li>• insufficient infrastructure,</li> <li>• and the need to avoid clustering multiple traveller sites in rural settings.</li> </ul>
Q80	Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. Faster build-out rates risk accelerating large developments in areas where infrastructure cannot cope. The parish opposes any mechanism that pressures rural locations to deliver major schemes more quickly.
Q81	Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large scale	Strongly disagree. The PC rejects any policy aimed at enabling or expanding large-scale residential or mixed-use development in or near rural parishes, due to irreversible landscape and community impacts.

	development are supported? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	
Q82	Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? (Yes, no)	No. The PC strongly opposes mechanisms that facilitate super-strategic sites, especially near rural parishes, due to catastrophic impacts on character, traffic, ecology, and settlement identity.
Q82a	Please provide your reasons.	The PC highlights that such developments: <ul style="list-style-type: none"> <li>• overwhelm rural surroundings,</li> <li>• create urbanisation,</li> <li>• strain roads and drainage,</li> <li>• and permanently destroy the parish's scale and identity.</li> </ul>
Q83	Do you agree with the proposed changes to the Housing Delivery Test rule book? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC opposes HDT mechanisms entirely, as they place undue speculative pressure on rural communities when councils fall short of targets.
Q84	Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC is cautious that economic "flexibility" could facilitate inappropriate business expansion into rural areas, undermining countryside character.
Q85	Do you agree with the approach to meeting the need for business land and premises in policy E2? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports small-scale rural enterprise but opposes allocations or policies that could encourage large business parks or industrial uses near the parish.
Q86	Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC opposes any freight/logistics development near rural parishes, citing HGV impacts, noise, light pollution, and unsuitable road networks.
Q87	Do you agree with the approach to rural business development in policy E4? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. Only <b>small-scale</b> , locally-run rural enterprises are appropriate. The PC opposes policies that could be interpreted to justify intensified commercial development or diversification beyond what local infrastructure can support.
Q88	Do you agree with the proposed changes to policy for planning for town centres? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While supportive of thriving town centres, the PC is concerned that policy shifts could inadvertently redirect development pressure outward toward rural parishes.
Q89	Do you agree with the approach to development in town centres in policy TC2? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports strengthening town centres but is concerned that ambitious town-centre regeneration targets may shift development pressure toward surrounding rural parishes when demand cannot be met centrally.

Q90	What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?	The PC notes that greater commercial flexibility in towns can result in more displacement of uses outward, occasionally increasing pressure for development in rural surrounds as businesses relocate or expand.
Q91	Do you believe the sequential test in policy TC3 should be retained? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. The PC supports retention to prevent out-of-centre retail or commercial proposals that could redirect economic activity from established centres and increase development pressure in rural parishes.
Q92	Do you agree with the approach to town centre impact assessments in policy TC4? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. Impact assessments should remain robust to protect both town centres and surrounding rural settlements from large out-of-town developments.
Q93	Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports broadband improvements but remains concerned about visual impact of new masts and cabinets on rural landscapes. We support gigabit and 5G where <b>CO1</b> re-use and <b>sensitive siting</b> are proven, heritage settings are protected, and cumulative street furniture is rationalised.
Q94	Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. Re-use is preferred, but the PC insists that any new infrastructure must be sensitively sited to avoid harming views, heritage settings, and village character.
Q95	Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC requests more stringent requirements in rural areas to ensure landscape, heritage, and amenity impacts are fully considered.
Q96	Do you agree with the approach to planning for energy and water infrastructure in policy W1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree. The PC is concerned that energy/water infrastructure expansion may disproportionately affect rural landscapes through cabling, substations, or pipeline corridors. Where <b>W3</b> support applies, routing, screening and decommissioning ( <b>W3(3)</b> ) must minimise harm to <b>views, tranquillity and heritage settings</b> ; similar caution applies to <b>W4</b> (water) given construction footprints in rural landscapes.
Q96a	Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?	Infrastructure development should avoid rural areas unless absolutely necessary and must minimise landscape disruption, noise, and visual impact.
Q97	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? Strongly agree, partly agree, neither agree nor	Partly disagree. The PC supports renewable energy in principle but opposes schemes that industrialise rural settings, such as large solar farms, battery storage compounds, or tall turbines.

	disagree, partly disagree, strongly disagree.	
Q98	Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC warns that broad support for energy infrastructure may open the door to large installations in sensitive landscapes.
Q98a	Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.	W3 should explicitly protect rural areas from inappropriate scale of energy infrastructure and require siting away from villages, viewpoints, and heritage assets.
Q99	Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree. The PC is concerned that water infrastructure expansions could impose construction impacts, land take, and permanent structures within rural landscapes already under pressure.
Q100	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? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Agree. The PC supports the prohibition, as coal operations would severely damage natural landscapes and conflict with environmental priorities.
Q101	Do you agree with how policy M1 sets out how the development plan should consider oil and gas? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC opposes policies that could facilitate onshore oil and gas activities in or near rural parishes due to risks to landscape, traffic safety on rural roads, and environmental quality. Plans should strongly resist such proposals in sensitive countryside locations.
Q102	Do you agree with the proposed addition of critical and growth minerals to the glossary definition of ‘minerals of national and local importance’? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While understanding national need, the PC fears that elevating these minerals could intensify pressure for new sites in rural areas, with unacceptable landscape and traffic effects.
Q103	Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non minerals development? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC is concerned safeguarding could be used to resist small-scale community projects while still enabling larger extraction interests; local discretion to protect amenity and character must prevail.
Q104	Do you agree policy M3 appropriately reflects the importance of critical and growth minerals? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. Elevating the importance of these minerals risks prioritising extraction above rural protection. The PC seeks explicit wording giving great weight to landscape, tranquillity, and heritage impacts.
Q105	Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Agree. The PC supports clear separation so that onshore oil and gas proposals face stringent scrutiny elsewhere and cannot benefit indirectly from M3’s emphasis on minerals of national importance.
Q106	Please provide your reasons, particularly if you disagree.	N/A (PC agrees with exclusion). The Council also seeks explicit prevention of policy cross-over that could weaken controls on hydrocarbons in rural areas.

Q107	Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC wants stronger safeguards on HGV movements on narrow rural roads, tighter operating hours, enforceable restoration bonds, and cumulative impact assessments.
Q108	Please provide your reasons, particularly if you disagree.	Without robust, enforceable measures, rural communities face prolonged noise, dust, vibration, and landscape harm; the PC therefore seeks stronger national wording to protect amenity.
Q109	Do you agree with approach to coal, oil and gas in policy M5? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC favours the most restrictive stance possible on coal, oil, and gas in rural areas, citing environmental risks and incompatibility with local character and climate aims.
Q110	Are there any other exceptional circumstances in which coal extraction should be permitted? (Yes/No)	No. The PC does not consider any additional exceptional circumstances appropriate within or near rural parishes.
Q111	If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.	Not applicable. The PC does not support additional exceptions beyond the national position.
Q112	Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC is concerned that safeguarding could constrain necessary local facilities yet still allow large extraction operations; rural amenity and highway safety must carry substantial weight.
Q113	Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC finds that MCAs often create uncertainty for rural parishes. It seeks clearer and stricter guidance to prevent MCAs from becoming a back-door justification for resisting small-scale local development while enabling large-scale mineral proposals.
Q114	Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC believes “efficient use of land” often translates into increasing density or allocating more sites. In rural parishes, this contradicts settlement character and infrastructure capacity. The PC seeks stronger safeguards for rural areas.
Q115	If not, what further guidance is needed?	The PC seeks explicit national recognition that: <ul style="list-style-type: none"> <li>• rural parishes must not be required to intensify,</li> <li>• “Efficient use” must not justify garden grabbing or back land development,</li> <li>• landscape and heritage character should override numerical efficiency measures.</li> </ul>
Q116	Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC fears L2 may promote intensification or infill unsuitable for rural villages. Assessment criteria must explicitly allow refusal where development harms rural character or exceeds service capacity.
Q117	Do you agree policy L2 identifies appropriate typologies of development to	Strongly disagree. Many intensification typologies—such as subdividing

	support intensification? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	plots, upward extensions, or higher-density redevelopment—are fundamentally inappropriate for rural parishes and risk harming character, amenity, and settlement pattern. <b>L2(1)(d)</b> encourages upward extensions, corner plots and curtilage redevelopment; <b>L2(d)(i)</b> further allows forms that <b>depart from the existing street scene</b> . In rural conservation contexts, these tools would erode vernacular scale and views; refusal hooks should be explicit where <b>local design codes</b> show harm.
Q118	Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports design quality but fears national-level principles may override local distinctiveness. Rural design must be rooted in local vernacular, scale, and landscape settings.
Q119	Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions. (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. Allowing development that differs from the existing street scene threatens the rural character of villages where uniformity of scale and vernacular design is central to identity.
Q120	Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC warns that allowing development in gardens and curtilages risks “garden grabbing,” loss of green space, increased flood risk, and suburbanisation of rural areas. Safeguards must be strengthened significantly.
Q121	Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree. The PC is concerned that L3 may be used to justify higher densities in rural parishes, where such intensification would be fundamentally inappropriate due to limited services, narrow roads, drainage constraints, and established village character.
Q122	Do you agree with the minimum density requirements set out within policy L3? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. Minimum density requirements risk forcing suburban-style housing forms into rural settings. The PC insists rural parishes must be exempt from these requirements, as higher density is incompatible with the visual, historical, and environmental character of the area.
Q122a	Please provide your reasons, particularly if you disagree.	The PC’s disagreement stems from: <ul style="list-style-type: none"> <li>• lack of public transport,</li> <li>• constrained rural roads,</li> <li>• absence of amenities,</li> <li>• sensitivity of landscape and heritage settings, and</li> <li>• risk of overdevelopment and loss of village identity.</li> </ul>
Q122b	Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics? Please provide your reasons, including any evidence.	Yes. Higher minimum densities may make it harder to provide culturally appropriate Traveller sites or accessible homes that require more space and privacy, potentially leading to inequitable outcomes.

Q123	Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of ‘net developable area’ within the NPPF suitable for this policy? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. Using dwellings per hectare risks oversimplifying density decisions in rural areas, where landscape constraints, topography, heritage settings, and street morphology matter more than numerical output.
Q124	Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well connected’ station? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. Applying “well-connected” assumptions to rural stations risks imposing higher density growth expectations on surrounding small villages, despite limited bus services, narrow lanes, and car-dependency.
Q125	Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? (Yes/No)	No. The PC strongly opposes any extension of national density standards, particularly into rural areas or other settings that could indirectly increase development pressure on the parish.
Q125a	If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?	Not applicable. The PC does not support extending national density standards beyond existing proposals.
Q126	Should we define a specific range of residential densities for land around stations classified as ‘well-connected’?	Strongly disagree. The PC opposes applying density ranges to station-adjacent land where stations serve rural areas. “Well-connected” labels can be misleading: rural stations often lack bus links, parking, active travel routes, and local capacity. Imposing density ranges risks forcing inappropriate development on rural communities.
Q127	If so, what should that range be, and which locations should it apply to?	Not applicable. PC opposes the concept. If government pursues density ranges regardless, rural stations <b>must be excluded</b> due to unsuitable road networks, limited transport, and absence of urban-level services
Q128	Do you agree policy L4 provides clear high-level guidance on good design for residential extensions? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC believes national guidance is too generic and risks weakening strong local design codes essential for preserving rural architectural distinctiveness.
Q129	Please provide your reasons, particularly if you disagree.	Rural areas depend on high design standards to maintain character. Without stronger protections, L4 could allow bulky or modernist extensions that disrupt traditional village-scale form and appearance.
Q130	Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. The PC supports robust criteria that prevent unnecessary loss of countryside. However, it emphasises that criteria must be sufficiently strict to avoid political or

		speculative expansion of settlements into rural land before designation is considered.
Q131	Please provide your reasons, particularly if you disagree.	The PC stresses Green Belt designation must function to restrict outward sprawl and protect rural identity. Any weakening or vague criteria risks development creep onto open landscapes.
Q132	Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC is concerned GB2 may encourage boundary review or erosion under strategic pressure. Rural parishes need stronger protections to prevent “nibbling” of Green Belt edges.
Q133	Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC rejects any policy encouraging intensified development around rural stations. Limited service frequency, inadequate transport connections, and sensitive landscapes make rural stations unsuitable for growth zones.
Q134	Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC fears GB5 may inadvertently make it easier for authorities to justify parcel-level release of Green Belt land, thereby threatening rural openness and long-established settlement boundaries.
Q135	Please provide your reasons, particularly if you disagree.	The PC believes GB5 relies too heavily on technical assessments and not enough on the lived reality of rural character, community identity, and the cumulative erosion of countryside.
Q136	Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC feels GB6/GB7 provide too many opportunities for exceptions, making Green Belt vulnerabilities worse. Rural parishes rely on strong Green Belt protection to prevent urbanisation and landscape harm.
Q137	Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC believes GB7(1h) risks enabling development in the Green Belt under the guise of meeting density standards. Rural parishes fear this would undermine the core purpose of the Green Belt — protecting openness and preventing urban sprawl — and could allow inappropriate intensification harmful to landscape, character, and heritage setting. <b>GB7(1h)</b> creates a pathway for station-area housing in the Green Belt where density tests are met. For our area, openness, long-views and dark skies mean the <b>very special circumstances</b> case remains unmade; density compliance alone cannot outweigh <b>harm to openness</b>
Q138	Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.	For rural areas, GB7(1h): <ul style="list-style-type: none"> <li>• pressures authorities to prioritise higher-density forms,</li> <li>• inadvertently disadvantages Gypsy and Traveller communities whose accommodation requires more space, privacy, and lower density,</li> <li>• and risks clustering Traveller sites away from Green Belt areas, creating inequitable outcomes.</li> </ul>

		<p>The PC views this as deeply inappropriate for rural contexts.</p> <p>Higher-density expectations could <b>disadvantage Traveller provision</b> which often needs <b>lower density and privacy</b>, reinforcing inequity if GB7(1h) becomes the dominant route for supply near stations.</p>
Q139	Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	<p>Partly disagree.</p> <p>The PC views viability flexibilities as commonly exploited to reduce contributions or justify excessive development. For rural areas, where infrastructure is already constrained, viability relaxations risk under-provision of mitigation and harm to local services.</p>
Q140	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>The PC urges strict enforcement to stop developers presenting marginal or rural brownfield fragments as justification for large greenfield development. The parish has seen repeated attempts to claim former farm structures or temporary uses as “PDL” to circumvent protections.</p>
Q141	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? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	<p>Partly disagree.</p> <p>While supporting affordable housing in principle, the PC fears that aggressive minimum floors may drive higher-density schemes or larger site allocations in rural areas that cannot absorb additional development.</p>
Q142	Please explain your answer, including your view on the appropriate approach to setting a ‘floor’, and the right level for this?	<p>Any affordable housing requirement must remain:</p> <ul style="list-style-type: none"> <li>• small-scale,</li> <li>• locally evidenced,</li> <li>• reflective of rural infrastructure limits,</li> <li>• and not used to push more development into rural villages.</li> </ul> <p>The PC strongly opposes a high “floor” in rural contexts.</p>
Q143	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? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	<p>Strongly disagree.</p> <p>10× EUP risks inflating land value expectations dramatically in rural areas, encouraging aggressive land promotion and increasing development pressure on protected landscapes. This is incompatible with maintaining rural character.</p>
Q143a	Please explain your answer.	<p>The PC’s reasons include:</p> <ul style="list-style-type: none"> <li>• rural landowners may hold out for inflated values,</li> <li>• it may encourage speculative acquisitions,</li> <li>• it could weaken local plan resistance to large-scale development,</li> <li>• and it risks urbanisation of rural parishes.</li> </ul> <p>The PC supports lower, contextual land-value assumptions.</p>

Q144	Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?	The PC strongly warns that standardised BLVs risk creating pressure for rural development driven by land economics rather than community need. BLVs must never override environmental protections or local decision-making.
Q145	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? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly disagree. The PC fears that modifying the grey-belt definition may invite development on sites currently seen as functionally Green Belt, especially at settlement edges. This risks fragmentation of rural openness and may set precedents for further erosion of Green Belt land.
Q146	Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. DP1 remains too broad to guarantee rural design quality. Rural parishes depend on sensitive, context-driven design guidance—not generic national expectations—to protect heritage, character, and village scale.
Q147	Do you agree with the approach to design tools set out in policy DP2? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports design tools in principle but is concerned that nationalised tools could override or dilute locally prepared village design statements and rural design codes that reflect local heritage and landscape context.
Q148	Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While welcoming emphasis on context, the PC is concerned DP3 does not explicitly require adherence to rural vernacular or landscape-specific design cues. Without binding local requirements, developers may still push suburbanising forms.
Q149	Do you agree with the proposed approach to using design review and other design processes in policy DP4? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. Design reviews can be useful, but the PC stresses they often lack rural representation and risk promoting urban stylistic trends. Local community-informed design scrutiny is essential for rural parishes.
Q149a	If not, what else would help secure better design and placemaking outcomes?	The PC recommends: <ul style="list-style-type: none"> <li>• mandatory reference to parish-level design statements,</li> <li>• explicit protections for landscape character,</li> <li>• requirements for context-tested modelling, and</li> <li>• community design workshops for developments in or near villages.</li> </ul>
Q150	Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan making? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. Rural parishes lack the infrastructure, bus services, cycle networks, and footway links envisioned in TR1. Without realistic investment, applying these principles locally risks creating unrealistic transport expectations that cannot be met.
Q151	Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and	Partly disagree. Maximum parking standards are unrealistic in rural parishes with no functional public transport. Reduced parking leads to overflow onto narrow lanes, harming

	requiring a degree of flexibility and consideration of business requirements in setting those standards? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	safety and access. Flexibility must be far stronger for rural contexts.
Q152	Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While clarity is welcome, the PC is concerned the Connectivity Tool assumes urban-style transport choices that are rarely available in rural areas. Labelling some rural stations or local corridors as “well connected” could create unrealistic assumptions about movement patterns and enable higher-impact development in the countryside.
Q153	Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The principles assume a level of public transport provision, footway continuity, and cycling infrastructure absent in many rural parishes. Without stronger rural caveats, TR4 risks setting unrealistic expectations or being used to justify inappropriate densities.
Q154	Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC is concerned roadside services can generate substantial traffic, lighting, litter, and noise. In rural areas with narrow lanes and landscape sensitivity, such developments should be subject to stricter controls than TR5 currently implies.
Q155	Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports proportionality but stresses the need for rural exceptions. Even small developments can severely affect rural junctions, narrow lanes, and walking safety; TR6 must recognise that impact thresholds differ between urban and rural contexts.
Q156	Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While such facilities are nationally important, their expansion can intensify noise, emissions, and traffic over large rural areas. TR7 should better address cumulative rural impacts and flight-path considerations.
Q157	Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. The PC welcomes stronger protection for rights of way, which are essential to rural recreation, local connectivity, tourism, and heritage character. TR8 must be enforced robustly, especially where development threatens established routes.
Q158	Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While supportive of healthy community principles, the PC warns HC1 could unintentionally justify additional development to meet standards rather than respecting existing rural scale and environmental limits.

Q159	Do you agree that Local Green Space should be 'close' to the community it serves? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. Local Green Space must be readily accessible to the community it serves. For rural settlements dispersed over wider areas, "close" should include short walking distances and safe connections.
Q160	Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. The PC supports stronger protection of rural facilities, which are vital to village life. However, the flexibility in replacement criteria ("and/or" quality/quantity) must not enable net loss of provision.
Q161	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?	The PC prefers clear, restrictive definitions. Rural communities often have limited health infrastructure and high car-dependency; clustering or expanding fast food outlets could undermine healthy-place goals.
Q162	Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. Village facilities (pubs, halls, shops, surgeries) are fragile. The PC supports strong policy weight against their loss and tight scrutiny of alternative-use claims.
Q163	Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of 'and/or' with reference to quantity and quality of replacement provision? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC fears the "and/or" wording could allow loss of valued open space under claims of "quality improvements" elsewhere. Rural communities depend heavily on local recreation spaces.
Q164	Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. Local Green Space should not be undermined by grey-belt classifications or PDL policies. Rural communities value these spaces as essential to landscape character and wellbeing.
Q165	Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC supports risk-led planning but warns that high-level national policy may overlook granular local constraints (e.g., drainage networks, narrow rural roads, heritage clusters).
Q166	Are any additional tools or guidance needed to enable better decision making on contaminated land?	The PC recommends clearer responsibilities for developers, especially on small rural brownfield sites (e.g., former agricultural or industrial uses), where legacy contamination risks are often underestimated.
Q167	Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. Pollution management is especially important for rural tranquillity. The PC supports strict controls on noise, traffic, glare, and odour from new development.
Q168	Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle? (Strongly agree, partly agree, neither agree nor	Agree. This principle helps ensure that existing rural uses (e.g., farming, community events, hospitality venues) are not unfairly restricted by new sensitive development.

	disagree, partly disagree, strongly disagree.)	
Q169	Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	Partly disagree. While safety is vital, the PC is cautious about policies that might enable unnecessary or visually intrusive security infrastructure in rural landscapes without strong justification.
Q170	Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC recognises national defence needs but is concerned that “substantial weight” could override rural amenity, tranquillity, and landscape protection without adequate mitigation.
Q171	Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. Although not in a coastal area, the PC supports clearer national safeguards for coastal communities. However, it stresses that similar clarity is needed for inland parishes facing surface water, river flooding and drainage risks — not only coastal risks.
Q172	Do you agree with the proposed clarifications to the sequential test set out in policy F5? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC stresses that sequential tests must remain strict in rural areas, where floodplain creep, surface water risk and drainage limitations can be acute. Any relaxation risks inappropriate development.
Q173	Do you agree with the proposed approach to the exception test set out in policy F6? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC is concerned the exception test may still be used to justify development in high-risk areas, especially where developers provide mitigation packages that do not address long-term sustainability or cumulative downstream impacts.
Q174	Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. The PC wants strong SuDS requirements due to existing issues with surface water runoff, sewer capacity and clay soils. National standards will help ensure rural housing schemes incorporate robust drainage solutions.
Q175	Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. Open watercourses improve flood management, wildlife habitat, and local amenity. The PC is supportive, especially where developers have historically culverted small streams to maximise developable land.
Q176	Do you agree with the proposed changes to policy for managing development in areas affected by coastal change? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. Although not directly affected, the PC supports robust restrictions to protect vulnerable communities. It recommends similar explicit protections for inland areas with long-term flood or drainage risk trends.
Q177	The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different	The PC suggests a precautionary approach: scenarios should err on the side of safety, especially where vulnerable communities and high-risk assets are

	scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?	involved. Policy should avoid optimistic assumptions about future erosion rates.
Q178	Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. While classification clarity is useful, the PC warns that some “less vulnerable” categories may still pose drainage or access risks in rural areas with limited emergency response capacity.
Q178a	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.	The PC recommends careful treatment of uses involving large impermeable surfaces, hazardous materials, or heavy traffic — all of which can worsen rural flood risks.
Q179	Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC values biodiversity but is concerned that off-site BNG and trading rules could still allow damage to sensitive rural locations. Stronger in-parish or local delivery expectations would help maintain ecological integrity.
Q180	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?	The PC supports >10% BNG where development harms valued rural landscapes, hedgerows, veteran trees, or river corridors. Higher BNG should apply to large edge-of-settlement schemes.
Q181	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? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. Rural landscapes rely heavily on safeguarding natural features. The PC welcomes N2 but stresses that developers must not overstate “mitigation” where prior removal of features has occurred.
Q182	Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. The PC believes N4 should be stronger in resisting development near setting boundaries. Rural parishes adjacent to designated landscapes may still experience harmful indirect impacts (lighting, views, noise).
Q182a	Please provide your reasons, including how policy can be improved to ensure compliance.	Policy must explicitly recognise: <ul style="list-style-type: none"> <li>• cumulative suburbanisation,</li> <li>• loss of tranquillity, and</li> <li>• creeping lighting impacts as reasons to resist development adjoining protected landscapes.</li> </ul>
Q183	Do you agree policy N6 provides clarity on the treatment of internationally, nationally	Strongly agree. The PC supports strong, clear protections for sensitive

	and locally recognised site within the planning system? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	ecological sites. It emphasises that locally designated sites should not be given materially lower protection than national ones where ecological value is high.
Q184	Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?	The PC urges: <ul style="list-style-type: none"> <li>stronger requirements for <i>local</i> delivery of environmental improvements,</li> <li>controls on off-site BNG “export” to distant locations,</li> <li>and secure long-term stewardship funding in rural areas.</li> </ul>
Q185	Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Agree. Additional regard duties should help ensure environmental protection is consistently applied, especially where development pressures conflict with rural character.
Q186	Do you have any evidence as to the impact of implementing the additional regard duties for development?	The PC notes that stronger regard duties often deter speculative applications by raising expectations for environmental compliance, which can be beneficial in rural areas.
Q187	Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. The PC values strong heritage-led plan-making, especially given local conservation areas, listed buildings and landscape character assets. Clearer policies help resist unsuitable proposals.
Q188	Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. H5 strengthens the ability to challenge poorly evidenced heritage assessments. Parish heritage settings are particularly sensitive to scale, design and massing.
Q189	Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly agree. The PC welcomes increased protection but urges absolute clarity to ensure “substantial weight” does not unintentionally dilute statutory protections for listed buildings and conservation areas. Given <b>HE6</b> elevates the weight for designated heritage assets, refusal is justified where massing, lighting or subdivision harms the setting of listed buildings or conservation areas.
Q190	Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. The PC values the emphasis on conservation areas, archaeological sensitivity, and high-quality heritage-responsive design. This supports resisting inappropriate development in historic rural settings.
Q191	Do you have any other comments on the revisions to the heritage chapter?	The PC welcomes stronger, simpler heritage policy but asks for explicit recognition of <b>cumulative suburbanisation</b> (lighting, traffic, massing) affecting rural conservation areas and settings, with clearer

		refusal hooks for schemes that erode village character over time.
Q192	Do you agree with the transitional arrangements approach to decision making? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree)	The PC supports a cautious transition so parishes are not exposed to speculative applications exploiting temporary uncertainty; early clarity on how much weight to give new national policies versus older local policies is essential.
Q193	Do you have any further thoughts on the policies outlined in this consultation?	The PC is concerned that a stronger “default yes” in certain locations could intensify pressure on small rural settlements; national text should signpost that <b>rural capacity and character</b> are legitimate limits on growth.
Q194	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? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Agree, provided no protective elements (e.g., enforcement emphasis on intentional unauthorised development) are weakened in translation to the new framework.
Q195	Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree — without strict siting principles, co-located energy + data centre proposals could industrialise rural landscapes and strain local grids/roads; clearer national guardrails are needed.
Q196	Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? (Yes/No)	<b>No</b> — higher thresholds risk pushing very large energy schemes into rural settings under national routes with reduced local control; existing thresholds should remain unless strict rural exclusions apply.
Q196a	If so, what do you believe would be the appropriate threshold? Please provide your reasons.	Any increase must exclude small parishes and protected landscapes; thresholds should <b>not</b> be relaxed where rural character, narrow lanes, or heritage settings would suffer significant change.
Q197	Do you have any views on how we should define ‘co-located energy infrastructure’? Please provide your reasons.	Definition must prevent “token” adjacency; require <b>on-site or contiguous</b> plots, shared infrastructure, and demonstrable mutual dependency — not just proximity.
Q198	Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres? (Yes/No)	<b>No</b> — lifting thresholds generally would encourage overscale rural energy schemes with inadequate local scrutiny and mitigation.
Q198a	Please provide your reasons.	Broad changes risk significant cumulative landscape, traffic and biodiversity impacts on rural areas already facing growth pressures.
Q199	What benefits or risks do you foresee from making this change? Please provide your reasons.	The main risk is <b>industrialisation</b> of rural settings and loss of local democratic oversight; any change must be paired with stringent siting and mitigation rules.
Q200	Would you support the use of growth testing for strategic, multi-phase schemes? (Strongly agree, partly agree,	Partly disagree — growth testing could normalise very large schemes in rural hinterlands; if adopted, it should

	neither agree nor disagree, partly disagree, strongly disagree.)	explicitly <b>exclude</b> small rural parishes and sensitive landscapes.
Q201	Would you support the optional use of growth testing for regeneration schemes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	The Parish Council acknowledges that growth testing may have value in large, complex urban regeneration projects, but is concerned that such a tool could be misapplied to edge-of-settlement schemes or rural-fringe sites that present themselves as “regeneration”, thereby enabling major development in inappropriate rural locations. Growth testing must not become a mechanism that indirectly encourages expansion into countryside areas under the banner of “deliverability”.
Q201a	Please explain your answer.	<ul style="list-style-type: none"> <li>• Rural parishes do not typically contain brownfield regeneration areas, so the tool may not be relevant locally.</li> <li>• There is a risk that developers could re-badge large greenfield/grey-belt proposals as “regeneration” to benefit from streamlined assessment.</li> <li>• Growth testing could unintentionally support larger, faster-paced development that exceeds rural capacity for transport, drainage, heritage protection, and community facilities.</li> <li>• Any optional tool must come with <b>explicit safeguards</b> stating it should apply <b>only</b> to genuine urban regeneration contexts and <b>not</b> to rural settlements or greenfield sites.</li> </ul>
Q202	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? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Agree more specificity deters speculative viability arguments that undermine infrastructure and affordable housing; local downward adjustments should be easy where rural constraints bite.
Q203	Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?	Partly agree. The Parish Council supports lower profit allowances only where this leads to greater delivery of affordable housing, infrastructure, or community benefits — not as a mechanism to justify larger or more intensive development in rural areas. Many rural schemes carry unique infrastructure burdens, so artificially low profit assumptions must not be used to force inappropriate scales of development into small parishes. Any non-GDV metric (e.g., IRR/yield) must be <b>alongside</b> GDV profit and <b>publicly disclosed</b> per <b>DM5(4)</b> , with <b>review mechanisms</b> per <b>DM5(6)</b> to recapture uplift for affordable housing and highways/drainage mitigation.
Q203a	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.	Acceptable contexts for lower profit levels: <ul style="list-style-type: none"> <li>• Affordable housing schemes delivered by Registered Providers.</li> <li>• Rural exception sites where policy requires a majority of affordable homes.</li> <li>• Community-led or parish-led schemes meeting genuine local need.</li> </ul>

		<p>Contexts where lower profit should <i>not</i> justify development:</p> <ul style="list-style-type: none"> <li>• Greenfield or edge-of-village schemes dressed as “low risk”.</li> <li>• Major speculative developments in areas with limited infrastructure.</li> <li>• Any circumstance where reduced profit is used to justify intensified density or growth contrary to rural character and capacity.</li> </ul> <p>The PC stresses that viability tools must not undermine rural protections or reduce the quality of mitigation required.</p>
Q204	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?	The Parish Council strongly supports clearer national guidance to prevent viability arguments being used to justify reduced affordable housing or mitigation in rural areas. Consistent profit expectations would reduce the ability of applicants to manipulate viability to the detriment of local communities.
Q204a	Please explain your answer.	<p><b>In particular, the PC recommends:</b></p> <ul style="list-style-type: none"> <li>• <b>Lower profit expectations</b> for schemes that are low-risk, policy-led, or affordable-led.</li> <li>• <b>Higher scrutiny</b> of profit claims on rural edge-of-settlement sites, where infrastructure and environmental constraints are more severe.</li> <li>• <b>Mandatory disclosure</b> of developer financial assumptions, preventing opaque viability claims.</li> <li>• <b>Secure review mechanisms</b> to recapture uplift if market conditions improve.</li> </ul> <p>The PC emphasises that inflated profit margins often drive density, scale and land value inflation in rural areas — undermining community objectives. Nationally standardised expectations would help ensure viability is not used to overrule local constraints or reduce the quality of rural placemaking.</p>
Q205	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?	Agree stronger standardisation helps ensure rural schemes include the full cost of mitigation (highways, drainage, landscape) rather than eroding obligations post-permission.
Q206	Do you agree there circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	<p>Partly agree.</p> <p>The Parish Council accepts that alternative metrics may sometimes be appropriate for specialist development types, but strongly emphasises that the use of such metrics must never undermine rural protections, nor be used to argue for reduced infrastructure, affordable housing, or mitigation in rural areas.</p> <p>The PC is concerned that developers may use alternative metrics to present schemes as marginal when they are not, particularly on rural edge-of-settlement or greenfield sites. Therefore, alternative metrics should be:</p> <ul style="list-style-type: none"> <li>• Fully transparent</li> </ul>

		<ul style="list-style-type: none"> <li>Presented <b>alongside</b> GDV-based calculations</li> <li>Subject to strict review mechanisms to prevent under-delivery of obligations</li> </ul> <p>The Parish Council supports their limited use <b>only</b> where they demonstrably increase certainty and help ensure full policy compliance, not reduce it.</p>
Q206a	Please explain your answer.	Alternative metrics are acceptable only where they <b>increase clarity</b> , not where they create scope for reduced contributions. They must be used with GDV-based profit, not instead of it, to ensure rural communities are not disadvantaged by opaque or selectively applied viability arguments.
Q207	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?	<p>Partly disagree.</p> <p>The Parish Council accepts that specialist development types sometimes use income-based return metrics. However, the PC is concerned that widening the acceptability of non-GDV metrics could be exploited to:</p> <ul style="list-style-type: none"> <li>Understate profitability,</li> <li>Argue for reduced affordable housing, or</li> <li>Reduce required mitigation on rural or edge-of-village sites.</li> </ul> <p>The Parish Council therefore believes:</p> <ul style="list-style-type: none"> <li>Non-GDV metrics should only be accepted for clearly defined development types such as BTR, student, co-living, and long-term income-based institutional models, not for typical market-sale housing.</li> <li>These metrics must never replace GDV profit entirely; they must be provided alongside a GDV-based calculation to allow proper comparison.</li> <li>Any use of non-GDV approaches should trigger greater scrutiny, not less, particularly where development would impact a rural parish landscape or infrastructure.</li> </ul> <p>The PC's priority is ensuring that alternative metrics do not provide a backdoor for developers to claim marginal viability in ways that undermine local benefits or lead to larger or denser schemes in rural areas.</p>
Q207a	Please explain your answer.	If accepted, require side-by-side reporting of GDV and non-GDV metrics, plus <b>review mechanisms</b> to capture upside and protect affordable housing/infrastructure delivery over time.
Q208	Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	<p>Strongly agree.</p> <p>The PC supports explicit national wording that no premium is assumed. In rural parishes, inflated premiums often translate into pressure for more units, higher densities, or reduced obligations. Clearer guidance would help prevent speculative land pricing from undermining rural character and essential mitigations.</p>
Q208a	In what circumstances might a premium, or the usual premium, not be required?	<ul style="list-style-type: none"> <li>Rural exception sites delivering mostly affordable homes to meet local need.</li> </ul>

		<ul style="list-style-type: none"> <li>• Community-led schemes (e.g., CLTs) prioritising place outcomes over profit.</li> <li>• Sites benefitting materially from public subsidy/infrastructure where uplift has already been captured.</li> <li>• Edge-of-settlement/greenfield proposals should not claim a premium where policy requires robust mitigation and the existing use value is clear.</li> </ul>
Q208b	What impact (if any) would you foresee if this change were made?	<ul style="list-style-type: none"> <li>• Reduces speculative land trading that fuels oversized rural schemes.</li> <li>• Protects rural infrastructure/landscape by limiting scope to erode mitigation through inflated “premium” arguments.</li> <li>• Encourages proponents to design to the policy envelope first, rather than relying on viability downgrades later.</li> </ul>
Q209	Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.	<p>Strongly agree.</p> <p>The Parish Council firmly believes extant consents must never be assumed to establish AUV unless they are demonstrably viable, up-to-date and realistically capable of implementation. Rural areas are particularly vulnerable to speculative historic consents being used to inflate land value expectations, which in turn enables developers to argue for reduced affordable housing, lower infrastructure contributions or greater development intensity. Ensuring extant consents are not treated as automatic AUV evidence is essential to protect rural communities and maintain planning integrity.</p>
Q209a	Please explain your answer.	Historic or unrealistic consents are often used to artificially inflate AUV in rural locations. The PC supports requiring proof of deliverability, conformity with current policy, and realistic implementation before an extant consent can inform AUV.
Q210	If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? (Decision maker discretion / Another metric / Neither)	<p>Decision-maker discretion, supported by strict national criteria.</p> <p>The Parish Council strongly prefers discretion rather than a single time-based metric, but this discretion must be supported by robust guidance to prevent misuse of outdated consents to inflate Alternative Use Value in rural areas.</p> <p>The PC recommends:</p> <ul style="list-style-type: none"> <li>• Decision-makers must consider whether the consent is genuinely implementable under current policy, infrastructure, and environmental constraints.</li> <li>• A time threshold (e.g., &gt;3 years since grant without meaningful progress) should <i>trigger heightened scrutiny</i>, not automatic acceptance.</li> </ul>

		<ul style="list-style-type: none"> <li>• Applicants must prove the consent still reflects realistic market conditions and viable build-out, not speculative uplift.</li> <li>• Extant permissions should never justify reducing affordable housing or mitigation on new proposals within rural parishes.</li> </ul> <p>This ensures rural communities are protected from inflated AUV claims based on old or unrealistic permissions.</p>
Q210a	If another metric, please set out your preferred approach and rationale.	<p>If a metric is used, it should:</p> <ul style="list-style-type: none"> <li>• Trigger a requirement for <b>fresh evidence</b> of deliverability.</li> <li>• Require applicants to demonstrate up-to-date <b>costs, constraints, and compliance</b> with current national and local policies.</li> <li>• Ensure that extant consents cannot be used to weaken rural protections or reduce obligations.</li> </ul>
Q211	What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?	The PC strongly supports excluding all non-compliant schemes. Rural parishes are especially vulnerable to speculative applications whose over-inflated assumptions undermine infrastructure funding, affordable homes and local protections. Only truly policy-compliant examples should influence BLV calculations.
Q212	Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context. (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Strongly agree. Without cross-checking, developers can present inflated or selective viability modelling. Using comparables strengthens local scrutiny and protects rural communities where abnormal costs (roads, drainage, landscape mitigation) are often significant.
Q212a	Please explain your answer.	Comparables prevent manipulation of viability figures to avoid delivering affordable housing or infrastructure. They help LPAs identify inflated assumptions that could disproportionately harm rural areas with limited existing services.
Q213	Do you agree that a 2.5 hectare threshold is appropriate? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. In rural parishes, 2.5ha sites can represent <b>very large</b> developments. The threshold should be lower in rural areas, or LPAs should be allowed to adjust thresholds based on landscape sensitivity and infrastructure capacity.
Q214	Do you agree that a unit threshold of between 10 and 49 units is appropriate? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Partly disagree. In rural villages, 10–49 dwellings can overwhelm infrastructure and character. The PC recommends <b>lower thresholds</b> for rural parishes or exemption where settlements are small or environmentally constrained.

Q215	Do you foresee risks or operability issues anticipated with the proposed definition of medium development? (Yes/No.)	Yes. Medium developments may be manageable in urban areas but overwhelming in small rural settlements. Definitions should allow LPAs to <b>downscale thresholds</b> in villages and landscapes with limited capacity.
Q216	If so, please explain your answer and provide views on potential mitigations.	Mitigations must include: <ul style="list-style-type: none"> <li>• Rural/urban differentiation</li> <li>• Stronger tests for settlement capacity</li> <li>• Ability to reduce thresholds for villages under 3,000 population or with limited infrastructure.</li> </ul>
Q217	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?	Partly disagree. Extending exemptions risks significant loss of obligations in rural areas where most sites are “small”. This could drastically reduce affordable housing and weaken transport/drainage mitigation locally.
Q217a	Please provide your reasons.	Exempting up to 50 dwellings would remove obligations from the majority of schemes in rural parishes, where sites are typically <50 units. This would harm community wellbeing and infrastructure delivery.
Q218	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?	Disagree. Rural parishes rarely host student accommodation; equating it to dwellings risks inappropriate extrapolations and distortions. Thresholds should reflect local relevance.
Q218a	Please provide your reasons.	The metrics are not transferable to rural settlements. Student blocks have urban-scale impacts and should not influence rural policy or thresholds.
Q219	If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.	Area must be included. Rural sites often have lower density but large land take. Using bedspaces alone risks allowing disproportionately large schemes to avoid obligations.
Q220	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.	Removing obligations from small sites could disproportionately affect disabled residents, low-income households and older people by reducing local affordable housing in rural communities.
Q221	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.	The PC fears behavioural manipulation (e.g., phasing to avoid thresholds) and a significant drop in local benefits from development. Rural areas risk being left with growth pressures but fewer contributions.
Q222	Do you agree with the proposal to extend the Permission in Principle application route to medium development? (Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.)	Disagree. PiP for medium development risks bypassing essential scrutiny of landscape, heritage, drainage and traffic impacts that are critical in rural parishes.

Q223	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?	The PC insists any PiP must include stronger, not weaker, evidence requirements — particularly around drainage, heritage, highways and rural character.
Q224	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?	The PC fears that PiP expansion will disproportionately harm rural communities and groups with protected characteristics by reducing early scrutiny of impacts on access, mobility, and local services.
Q224a	If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.	In rural areas, vulnerable residents dependent on limited local services may be disproportionately affected if development proceeds without adequate assessment of infrastructure and accessibility needs.
Q225	Is there anything that could be done to mitigate any impact identified?	Mitigations must include: <ul style="list-style-type: none"> <li>• prohibiting PiP for rural parishes and landscape-sensitive areas</li> <li>• requiring full drainage, heritage, traffic and character assessments</li> <li>• ensuring early community engagement is mandatory for medium schemes</li> </ul>