



Creating Places ■ Delivering Communities

Land, Planning and Development Federation's response to:

Proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation

LPDF

March 2026



Introduction

Thank you for consulting the Land, Planning and Development Federation (LPDF) on the proposed revisions to the National Planning Policy Framework (NPPF). The LPDF welcomes the publication of a revised Framework and the opportunity to contribute to this important stage in the Government's programme of planning reform.

The Federation recognises the significant changes to planning policy that have been brought forward since the Government came into office. The pace at which reforms have been advanced reflects a clear commitment to ensuring that the planning system is equipped to support sustainable economic growth and increased delivery.

The general direction of travel reflected in the proposed changes to the NPPF is positive and is supported by the LPDF. In particular, the emphasis on strengthening the plan-led system, supporting economic growth, and increasing housing delivery represents a constructive and necessary approach to ensuring that the planning system operates effectively and with greater certainty.

Much of what is included within the draft Framework is to be welcomed. Consequently, the majority of the comments set out in this response are intended to suggest targeted refinements, clarifications and minor adjustments which, in the LPDF's view, would help to maximise the effectiveness of the reforms and ensure that the Framework fully achieves its stated objectives. We believe that with careful adjustment, the revised NPPF can provide the clarity, consistency and confidence required to accelerate delivery and secure the economic and social benefits that these reforms are intended to unlock.

The LPDF and its members remain committed to engaging constructively with MHCLG as these reforms are finalised.

About the LPDF

The LPDF seeks to represent the UK's leading land promoters, home builders and commercial developers. LPDF members support the housebuilding and commercial development sectors by promoting sites through the planning system, providing "shovel ready" land with a planning permission which can facilitate the delivery of infrastructure and serviced land parcels.

The LPDF seeks to actively engage with government on planning, housing and commercial development policy and to educate the wider public on the social, environmental and economic benefits of development through an evidenced based approach.

The LPDF encourages its members to deliver well designed, high quality, sustainable places which deliver a mix of housing types and tenures, commercial spaces and community uses that have a positive social, environmental, and economic impact.

Our key values include:

- Working in a positive and cooperative way with central and local government and key stakeholders, to deliver a planning system capable of supplying the homes and employment space we need.
- Promoting research and an evidence-led approach to policy development.
- Increasing the supply of new homes to meet demand and make home ownership a realistic possibility for all those who aspire to it.
- Ensuring that we build the affordable homes of all types and tenures that this country so desperately needs.
- Delivering new employment space to meet demand from businesses and support economic growth.
- Championing the impact of increased housing delivery on reducing intergenerational unfairness.
- Creating well designed, high quality and sustainable places to live and work.
- Educating and informing about the social, environmental and economic benefits of development.
- Supporting diversity of delivery in the market and championing SME developers.
- Promoting diversity and inclusivity within the sector.

Overview

The LPDF response provides detailed answers to a substantial proportion of the questions set out in the consultation document. In doing so, the LPDF has sought to engage constructively with the Government's objectives of accelerating housing delivery, strengthening economic growth, and improving the effectiveness of the planning system.

However, our review identifies a number of key areas where further refinement would materially improve the Framework's ability to support delivery in practice. Addressing these issues will be critical to ensuring that the ambitions underpinning the consultation translate into viable, implementable development across a broad range of market areas.

The principal areas which the LPDF believe require further consideration are summarised below.

Viability

The LPDF has significant concerns regarding the proposed changes to viability policy and the timing of their introduction.

The reforms appear to be predicated on the operation of a fully plan-led system, in which up-to-date local plans are in place across the country and policy requirements are clearly established at the plan-making stage. However, this is not the current context. With only approximately 25% of local planning authorities operating with an up-to-date local plan, the system cannot reasonably be described as operating in the “ideal” conditions assumed by the proposed reforms.

Introducing fundamental changes to viability in the absence of comprehensive local plan coverage risks creating uncertainty, delaying decision-making, and undermining delivery. The proposed approach may be more appropriate in a future scenario where local plan coverage is close to universal and policy requirements have been properly tested through examination. At that point, it may be reasonable to reconsider the role of viability assessments and consult on reforms as a standalone exercise. In the current environment, however, such changes are premature.

This concern is compounded by the current prevailing market conditions. The housing market remains extremely challenging, with significantly subdued sales rates. Recent LPDF/Savills research¹ on the case for demand-side support, highlights how whilst average sales rates reported by PLC housebuilders show signs of recovery, smaller firms delivering less than 1,000 homes per year have been hit much harder, seeing no improvement in sales rates over recent months. Sales rates at the current level are a major threat to the survival of many of these smaller housebuilders.

In this context, further tightening of viability policy risks suppressing output at precisely the moment Government is seeking to increase housing supply.

It is also important to recognise that the existing system is functioning more effectively than is sometimes suggested. Development contributions are being secured, and substantial value is already being captured from land through Section 106 agreements and other mechanisms. If the objective is to ensure that communities see the benefits of development, the policy focus should be on improving the deployment and timely spending of secured contributions, rather than introducing additional viability constraints that may reduce the number of schemes coming forward.

If the Government’s primary objective is to increase housing delivery and support economic growth, then now is not the appropriate time to introduce significant reforms to viability policy. The sector is already having to adapt to the introduction and implications of BNG requirements, Building Safety Levy and Future Homes Standards, all of which have an impact on viability, and these requirements are only really just starting to bed in. Stability and certainty are essential to rebuilding market confidence.

¹ [The case for Demand Support.pdf](#)

Development around train stations

The LPDF welcomes the Government's objective of promoting development around existing and proposed railway stations as a means of supporting sustainable growth. We are aware that the Ministry of Housing, Communities and Local Government (MHCLG) is actively seeking industry input to shape this policy, and we are pleased to contribute to this discussion.

As detailed within our response to questions relating to Policy S5, in order to maximise the effectiveness of this policy approach and ensure a wider distribution of benefits across the country, the LPDF recommends expanding the travel-to-work area (TTWA) criteria outlined in footnote 26 to Policy S5, to the top 100 TTWAs, rather than the top 60. Limiting the policy to smaller or more centralised areas risks concentrating the benefits in the Southeast and London-centric locations, reducing the policy's impact in other parts of the country where development opportunities could support local housing delivery and economic growth. This change would also widen the impact of the policy to better align with other Government initiatives such as the Ox-Cam Corridor and New Towns.

The proposed density requirement of 40–50 dwellings per hectare (dph) in relation to proposals within reasonable walking distance of a railway station (Policy L3(3)) raises significant practical concerns. Such levels are generally inappropriate outside of major urban centres, as they fail to account for local character, landscape sensitivity, existing built form, and market demand. In many rural and semi-rural locations, the predominant local demand is for houses rather than flats and imposing high-density requirements could make development unviable or undeliverable.

Density expectations at this level also risk constraining land supply. Sites that might otherwise come forward for development may be excluded, if they cannot meet the prescribed density or typology, thereby undermining the very objective of increasing housing delivery near sustainable transport nodes. A policy approach which does not align with local market preferences and site realities is unlikely to achieve its intended outcomes.

Therefore, while the LPDF supports the principle of promoting development near stations, the policy must be drafted to reflect local context, market demand, and deliverability.

SME developers

The LPDF strongly emphasises the critical role of small and medium-sized housebuilders (SMEs) in delivering a diverse and resilient housing market. Without a plurality of active developers, it will be extremely challenging for the Government to achieve anywhere near its housing delivery targets. SMEs are often responsible for development on smaller and

more complex sites, contributing to local supply in areas where larger national operators are less active.

Recent LPDF/Savills research² highlights the pressures facing this sector. While sales rates for large PLC housebuilders are beginning to show signs of recovery, smaller firms have seen no improvement in recent months, and the SME sector is continuing to shrink. This trend risks reducing competition, slowing build-out rates, and concentrating delivery in the hands of fewer, larger companies, undermining both housing supply and market resilience.

Policy and planning reforms must therefore actively support SME growth, providing certainty in the planning process, proportionate regulatory expectations, and measures that help smaller developers respond to local demand. Supporting SMEs is not a peripheral concern: it is central to maintaining a healthy, competitive housing market capable of delivering the volumes required to meet national need.

Multi-tenure requirements

The LPDF supports the principle of promoting multi-tenure development as a means of increasing housing delivery, improving absorption rates, and creating mixed, resilient communities.

However, the proposed threshold of 150 units for multi-tenure requirements (as set out in Policy HO5(1)(d)) is, in the LPDF's view, too small to deliver a range of tenures and therefore, is not practically deliverable. The current benchmark does not reflect the realities of modern housing delivery, particularly in the context of larger housebuilders operating multiple brands from a single site. In practice, schemes of 150 units are often insufficiently large to accommodate multiple tenure types without compromising commercial viability, operational efficiency, or site design.

A threshold of at least 500 units would be more appropriate. This would ensure that multi-tenure requirements are applied to developments where delivery is realistically achievable, providing sufficient scale to integrate a mix of tenures effectively while maintaining operational efficiency for developers. Applying the current 150-unit threshold risks creating policy obligations that cannot be met in practice, potentially slowing delivery and adding unnecessary complexity for developers, local planning authorities, and communities alike.

Connectivity tool

The LPDF supports the principle of promoting development in sustainable and well-connected locations. However, the proposed connectivity tool (as set out in Policy

² [The case for Demand Support.pdf](#)

TR1(1)(b)), raises significant concerns regarding its application and potential unintended consequences.

The methodology appears inherently urban-focused. By its nature, a standardised scoring system will tend to favour higher-density urban areas with established public transport networks and clustered services. Development in rural or semi-rural locations is unlikely ever to achieve comparably high scores, even where proposals are relatively well connected within their local context and represent sustainable growth for that settlement.

This creates a structural imbalance between urban and rural areas. There is also a lack of clarity as to how the scoring system would operate in practice. In the absence of clear thresholds and flexibility, the tool risks becoming overly determinative, reducing the scope for planning judgement.

For these reasons, the LPDF considers that the connectivity tool, which is still in beta testing, is not appropriate to be referred to in Policy TR1 and that it would be more appropriately positioned within Planning Practice Guidance. This would allow for refinement over time, clearer methodological guidance, and greater flexibility in its application. It would also avoid elevating what is, by necessity, a simplified metric, into a blunt policy instrument with unintended spatial consequences.

Storage and distribution uses

The LPDF would like to highlight the importance of the storage and distribution sector to the UK's economy and the critical role that the planning system has to play in supporting the sector's growth. It is essential that national planning policy creates the conditions for the growth needs of the sector to be fully realised, by ensuring sufficient provision of storage & distribution operations in accessible locations with adequate supporting infrastructure.

The LPDF would draw attention to two general consistency matters that we consider are important in respect of the terminology used throughout draft NPPF.

There is currently no consistent phraseology used regarding how land for business or commercial needs is referenced and in practice, it is often referred to as 'employment land' (a term not included in national policy). For example, in some cases the draft NPPF simply references 'housing and other uses'. The effect of this is to diminish the importance of this land use category and the way in which it needs to be planned for, which the LPDF does not believe is consistent with the Government's stated number one mission to secure economic growth. Accordingly, the LPDF proposes that the term 'business land and premises' be specifically adopted as the umbrella term to give greater and specific recognition of planning for office, industrial, storage and distribution uses (i.e. E g (i)(ii)(iii), B2 and B8). We draw this term from draft Policy E2.

The draft NPPF also makes inconsistent and alternating references to the freight and logistics sector and storage and distribution uses, which the LPDF considers are confusing. For example, Policy S5 refers to 'development for storage and distribution purposes', Policy E1 para 1 part c (ii) refers to 'storage and distribution operations', and Policies E2 and E3 refer to 'freight and logistics' (the latter being cross-referenced by Policy S5). The LPDF is minded that this should be simplified throughout the NPPF to 'storage and distribution uses', in line with the Use Classes Order in England.

Questions

1) Do you have any views on how statutory National Development Management Policies could be introduced in the most effective manner, should a future decision be made to progress these?

The LPDF has always advocated for the introduction of National Development Management Policies (NDMP) and it is considered that doing so within the National Planning Policy Framework (NPPF), is an appropriate vehicle in the first instance. It is helpful that the Decision-Making policies are incorporated within their own chapter within the NPPF so that those who are engaging with the document, clearly understand which policies apply to which situations.

However, the LPDF has always maintained that any Decision-Making policies should be introduced on a statutory basis. Therefore, we welcome the Government's statement that their statutory status will be kept under review.

The success of these policies will be in their implementation. If, as set out in the draft, the policies are embraced by Local Planning Authorities (LPAs), are not repeated or modified by LPAs in their development plans, and that any inconsistency between adopted local plan policies and the Decision-Making policies will attract little weight being placed on the local plan policy, then their statutory status may not be necessary. The Government must, however, monitor the success of the Decision-Making policies closely to ensure that they are achieving the results that they were designed to achieve.

2) Do you agree with the new format and structure of the draft Framework which comprises separate plan-making policies and national decision-making policies?

Strongly Agree.

The new format for the NPPF is welcomed as it is clear and understandable as the policies are currently differentiated. The document is considerably longer as a result, but with the complexity of the issues that the draft NPPF covers, this is inevitable.

It would be useful if the document was numbered in a way that it is easy to refer to in both decision making and plan making, as LPAs, applicants, Inspectors etc. often need to refer to specific elements of the NPPF. The ability to quote paragraph numbers is therefore essential to ensure that there is no ambiguity in the referencing.

3) Do you agree with the proposed set of annexes to be incorporated into the draft Framework?

Partially Disagree.

The LPDF notes that in respect of housing development, there has been a long-standing requirement for local planning authorities to identify and update annually a supply of specific deliverable sites, sufficient to provide a minimum of five years' worth of housing. Such requirements also apply to traveller sites. These matters are set out at Annex D of the draft NPPF.

Given the importance of securing economic growth, and to ensure effective implementation of draft Policies PM1, S1, S2, E1 and E2, the LPDF is firmly of the view that such a requirement should also apply to business land and premises. This would

also have the effect of setting a requirement for more accurate monitoring of business land and premises availability, something the LPDF notes is no longer maintained by many LPAs.

We propose that such a requirement is introduced in Annex D as follows:

Five year supply of business land and premises

Local planning authorities should identify and update annually a supply of specific deliverable sites that are appropriate to meet a range of business land and premises needs. This should be sufficient to provide a minimum of five years' worth of supply, assessed against the business land and premises requirement defined in the development plan, or the latest evidence on needs where the development plan requirement is more than five years old.

This requirement would also form the basis of a new criterion to be inserted within Policy E2 para 2, as set out below. The effect of this would be that 'unmet needs' would be automatically engaged if a local planning authority were not able to demonstrate an up-to-date supply of deliverable business land and premises, in addition to the other criteria set out in Policy E2. This provision would be over and above the 'permanent' presumption in favour of supporting development that accords with Policies E2 and E3, as per our proposed amendments set out in this response.

It would also serve to incentivise regular plan-updating and monitoring and ensure a sufficient and deliverable land supply is always available to respond to shorter term market needs, which the LPDF considers would increase the responsiveness of the planning system to meeting market needs.

E2 para 2 part a (new) "A five-year supply of business land and premises can be demonstrated; or"

4) Do you agree with incorporating Planning Policy for Traveller Sites within the draft Framework?

Strongly Agree.

5) Do you agree with the proposed approach to simplifying the terminology in the Framework where weight is intended to be applied?

Strongly Agree.

The LPDF supports the simplification of the approach taken to weight when applying the NPPF. Concentrating principally on substantial weight, removes ambiguity in the decision-making process and makes the planning balance exercise more transparent for all.

6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1?

Strongly Agree.

The LPDF supports the move back to strategic planning and recognises the importance of longer-term strategic plans in setting the context for growth across areas that are wider than individual LPAs. Objectively assessed needs for housing and other uses, such as strategic employment, need to be apportioned fully at the strategic scale, where possible, to ensure that any needs which cannot be accommodated in an individual authority area, are delivered elsewhere across the wider geographic area.

We agree that strategic plans of this nature should be prepared to cover a significant timeframe (20 years minimum) and should be monitored and reviewed so that a replacement plan is adopted no later than 10 years after the current version was adopted. A similar approach should be taken to the review of Local Plans with a replacement Local Plan being adopted no later than 5 years after the current version was adopted.

It is essential for strategic authorities to ensure the full involvement of all relevant infrastructure providers in the preparation of the plan so that their plans for investment can be matched to the growth anticipated through the strategic plan. This will avoid any delays in the delivery of development due to the lack of infrastructure capacity at the time the development takes place.

The LPDF agrees with the role and content of spatial development strategies and welcomes the introduction of the sub-regional level in plan-making. These strategic plans will be required to robustly assess and distribute the development needs of the storage and distribution sector that in many cases extend across local authority boundaries.

The LPDF has evidence of many councils failing to adequately identify and accommodate those needs, and even when strategic evidence exists, this is not always taken into consideration when informing new local plans. For example, the West Midlands Strategic Employment Sites Study (2024)³, which identifies the need for additional strategic employment sites, and also proposes the appropriate locations where this should be accommodated, has been widely ignored by a range of local authorities. In particular, with a Statement of Common Ground⁴, 14 Councils across the Black Country FEMA and neighbouring areas agreed that those Local Plans which are at Regulations 19 stage or beyond, will consider the strategic evidence in a future review. The effect of this is simply to create at least a 5-year delay for new sites to be allocated, with significant impacts on the cost and efficiency of the storage & distribution (alongside some strategic industrial) sector's operations and with significant lost investment.

³ West Midlands Strategic Employment Sites Study 2023/24 (Mace, Icen, et al, 2024) Available at: <https://www.hwa.uk.com/site/wp-content/uploads/2024/02/WMSESS-Final-Report-Phase-3-Aug-2024.pdf>

⁴ Black Country Functional Economic Market Area (FEMA) and locations with an economic relationship with the Black Country FEMA, Statement of Common Ground, Position at January 2025, Available at: https://www.sstaffs.gov.uk/sites/default/files/2025-04/ssted12_officer_agreed_socg_bc_fema_v5.pdf

On this basis, the LPDF welcomes the PM1 and the sub-regional plan-making role that this introduces. However, as it is phrased currently, it gives emphasis solely to the housing sector, and on this basis, the following additions are proposed to enhance Policy PM1 and elevate the importance of planning for business land and premises:

- *PM1 para 1 “Spatial development strategies should set a positive vision for future growth and change at a sub-regional scale and provide a clear spatial framework for investment and growth, including **meeting the development needs** for new housing **and business land and premises**. Their content should be genuinely strategic in nature and allow for more detailed issues to be considered and addressed through other parts of the development plan”.*
- *PM1 para 2 part a “ Setting out a strategy for a sustainable pattern of growth covering a period of at least 20 years, including through the apportionment to local planning authorities in the strategy area of objectively assessed needs for housing, **business land and premises**, and other uses that are best considered at a strategic scale for the duration of the plan period;”*
- *PM1 para 2 part c “Supporting economic growth by providing a spatial framework for **accommodating the need for business land and premises**, strategic investments and giving spatial expression to strategic elements of Local Growth Plans and the National Industrial Strategy;”*

7) Do you agree that alterations should be made to spatial development strategies at least every 5 years to reflect any changes to housing requirements for the local planning authorities in the strategy area?

a) If not, do you think there should be a different approach, for example, that alterations should only be made to spatial development strategies every five years where there are significant changes to housing need in the strategy area?

Strongly Disagree.

The LPDF consider that there needs to be a mechanism to amend SDSs, if there is a significant change to housing requirements. However, the need to create a flexible strategy needs to be balanced against the drive to create stability and certainty in the new plan-led system.

Therefore, rather than set a mandatory five-year alteration period, the LPDF would encourage a more flexible approach to alterations whereby a strategic authority could conduct reviews and alterations after a minimum of five-years, where there is a significant change to housing or other factors deemed suitable.

However, the LPDF strongly considers that that such alterations should also be able to be triggered by the changing need for business land and premises in a similar way and the policy wording should be amended to reflect this.

8) If spatial development strategies are not altered every five years, should related policy on the requirements used in five year housing land supply and housing delivery test policies, set out in Annex D of the draft Framework, be updated to allow housing requirement figures from spatial development strategies to continue to be applied after 5 years, so long as there has not been a significant change in that area's local housing need?

Alterations to SDSs should be undertaken every 10 years. There shouldn't be 'significant changes' to housing requirement figures (over the SDS plan period) unless there is a change to the methodology for calculating need. Any change to methodology would need to be consulted upon, and a transitional period would also need to be allowed for. Reference to 'significant change' should be deleted as it undermines the overall approach in respect of the endurance of SDSs.

9) Do you agree with the role, purpose and content of local plans set out in policy PM2?

Partially Agree.

However, the LPDF strongly considers that the review element of Policy PM2 should reflect the review mechanism set out in Policy PM1 for consistency.

As currently expressed, if the review of a Local Plan is only required to be commenced no later than 5 years after the adoption of the current plan, and it takes 30 months to adopt a Local Plan following commencement, then the existing Local Plan could be a minimum of 2.5 years out of date before the next plan is adopted. This could have a significant impact on the delivery of development in an area. Therefore, the LPDF suggest that replacement Local Plans should be adopted no later than 5 years after the current version was adopted. This will ensure that the planning system is truly plan led, that Local Plans remain up-to-date and that the latest development needs are reflected in the plan.

10) Do you think that local plans should cover a period of at least 15 years from the point of adoption of the plan? Yes/No

a) If not, do you think they should cover a period of at least 10 years, or a different period of time. Please explain why.

Yes.

Local Plans must cover a plan period of at least 15 years from the point of adoption. However, at present, the wording of Policy PM2 states that plans 'should' cover a period of at least 15 years. This wording should be changed to 'must' to ensure a consistency of approach across the country and to deliver a truly plan led system.

11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies?

Partially Agree.

However, similar language is used in the first paragraph of Policy PM6 in that "All plan makers should..." This allows LPAs to argue the case that local circumstances mean that they should introduce local variations to the policies contained in the NPPF and this

could deliver an inconsistent approach to policy across the country. The LPDF considers that for Policy PM6c, the ‘should’ should be replaced with ‘must’.

12) Do you agree with the approach to initiating plan-making in PM7?

Partially Agree.

Although for the reasons set out in our response to **Question 9** above, The LPDF consider that the Plan Evaluation Report should be prepared at the end of Year 3.

13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8?

Strongly Agree.

The LPDF particularly supports the requirement set out in Policy PM8(e), that no new or additional evidence is prepared after the plan is submitted unless requested by the Inspector. This should avoid lengthy delays in the examination process as a result.

The LPDF also considers that the Government should introduce a timeframe for the evidence preparation stage of local plan preparation, to ensure that this stage of the process is not unduly lengthy, thus delaying the preparation of a Local Plan.

It is important that strategic development needs are identified robustly to inform SDSs and local plans. In terms of storage and distribution uses, which typically operate in market areas that cut across local authority boundaries, a key part of the evidence base must relate to assessing development needs. On this basis, the following addition aims to highlight the importance of preparing joint evidence on this matter specifically:

PM8 para 2 part c *“Where appropriate, work jointly with neighbouring or other relevant plan-makers to prepare evidence, particularly relating to cross-boundary **development needs and other matters**, and where a joint approach could support improved cooperation”*;

In relation to footnotes 13 and 14, the LPDF notes there is very limited detail set out in this guidance in relation to assessing business land and premises needs of different types and across different market areas and would welcome a further discussion with officials. In the meantime, we consider our proposed updates to the PPG (see Appendix 1) are essential.

14) Do you agree with the approach to identifying land for development in PM9?

Partially Agree.

The policy should refer to the preparation of, and updating of, a Strategic Housing Land Availability Assessment (SHLAA), as this is an understood and common tool for the identification of sites in the Local Plan preparation process. It should be recommended that any SHLAA which is prepared is kept updated on a regular (annually) or on-going basis in order that Councils who are unable to demonstrate a 5 YHLS can approach those sites viewed as deliverable. The Government should consider introducing a template SHLAA for LPAs to follow to ensure a consistency of approach.

15) Do you agree with the policies on maintaining and demonstrating cross boundary cooperation set out in policy PM10 and policy PM11?

Partially Agree.

However, infrastructure providers have been noticeable by their absence from many local plan preparation processes which has led to a misalignment of infrastructure investment and delays in the development delivery process, as infrastructure providers get involved too late in the development process. The Government needs to include additional wording in Policy PM10 and PM11 to ensure that there is a strong direction placed upon infrastructure providers to get involved in the plan preparation process, with sufficient warnings given of the consequences for those providers if they do not engage at the appropriate stage.

16) Do you agree that policy PM12 increases certainty at plan-making stage regarding the contributions expected from development proposals?

Disagree.

The current policy and guidance in relation to developer contributions currently works and as a result, the approach should remain unchanged. LPA affordable housing policies are based on plan-wide assessments of need and viability, and developers are able to challenge these requirements based upon detailed site specifics of a proposal and market changes that have occurred since the Local Plan Viability Assessment was undertaken.

Policy PM12 aims to give more weight to high level plan-led viability policies and this needs to operate effectively alongside Policy DM5 which includes a number of circumstances where site specific viability assessments would be justified. The way these policies are currently worded is likely to lead to confusion and an inconsistency of approach and they are unlikely to significantly reduce the need for application viability assessments to be required. For Policy PM12 to work effectively alongside Policy DM5, comprehensive and up to date local plan coverage is needed. At present, up-to-date local plan coverage is around 25% and with the requirement to integrate local government reorganisation and SDSs into the local plan preparation process, this figure unlikely to increase significantly in the near future.

The viability testing that takes place at a Local Plan level is limited and is undertaken at a point in time and under the specific economic conditions prevalent at the time of assessment. Therefore, the LPDF consider that Policy PM12(4) should simply state that on a case-by-case basis, there may be circumstances whereby, submission of viability evidence alongside a proposal may be justified to aid decision making.

17) Do you agree that plans should set out the circumstances in which review mechanisms will be used, or should national policy set clearer expectations?

Strongly Agree.

18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015?

Strongly Agree.

Limiting the ability for LPAs to set local standards would simplify the process of complying with such standards across the county, would allow for innovation in technology to take place to meet the standards, and would assist SME developers to navigate the system more easily as they will be fully aware of the standards which need to be met.

Significant amounts of Local Plan Examination time is spent discussing the justification for LPAs setting their own local standards, often without proper evidence to justify their position. Local Plans have also increased in length and complexity over recent years as LPAs have included increasing numbers of local standards policies. Limiting the ability to set local standards through Local Plans will increase the likelihood that the 30-month preparation process can be met.

19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination?

Strongly Agree.

However, the Planning Practice Guidance (PPG) will need to define what is meant by the term 'stringent efforts' in Policy PM14(2)(a).

20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?

In Policy PM4, it needs to be stated that Supplementary Development Plans (SDPs) will need to undergo a period of consultation during their preparation process.

21) Do you agree with the principles set out in policy DM1?

Partially Agree.

Whilst the LPDF agree with the wording of Policy DM1, there are some practical issues which need to be addressed when this Policy is implemented by LPAs.

Whilst most applicants seek to engage with the LPA, key stakeholders and other relevant bodies before an application is submitted, this often proves to be difficult to achieve. There is no requirement placed on statutory consultees to engage in pre-application discussions, and many LPAs struggle to devote significant resources to this stage of the planning process. This can cause considerable delay in the planning process as applicants wait for the LPAs to get the correct people and disciplines around the table.

LPAs also charge for the pre-application process, and although there is no detailed evidence available highlighting the costs charged for this service, anecdotal evidence from our members suggests that these costs vary dramatically across the country, with some charges being considerable. These charges often do not reflect the output that is gained from the pre-application process, and this can make applicants carefully consider whether the pre-application process is worth entering into.

Excessive pre-applications charges also have a disproportionate impact on SME developers, who often cannot justify the expense at an early stage of the planning process because of cash flow limitations.

In order to address these issues, the LPDF consider that the Government should set out clear guidance for LPAs, and Statutory Consultees, including the expectations set for their involvement in the pre-application process, timescales setting out targets for delivering pre-application meetings and the final written outcome / advice, clear charging schedules for the pre-application stage, template output reports for advice following the pre-application stage (this would improve and regularise output), and implications for not engaging in the process or not meeting the prescribed requirements. These issues were explored in detail in the LPDF's response to the 'Reforms to the Statutory Consultation System' consultation⁵.

Finally, whilst the LPDF support the use of the word 'proportionate' in Policy DM1, we consider that the term should be clearly defined in the Glossary in order to ensure a level of consistency of approach by both applicants and LPAs.

22) Do you agree with the policy DM2 on information requirements for planning applications?

Partially Agree.

However, there needs to be clear guidance issued by Government, either through the PPG, or through nationally set validation checklists, which clearly set out the information requirements for the different categories of development (small, medium and major sites). Then Policy DM2 can allow for local variations to these lists, but only where a policy in the adopted development plan requires it.

The Government should also define the term 'proportionate' as included in Policy DM2(2) in the Glossary or include guidance in the PPG on how the term should be interpreted.

23) Do you have any views on whether such a policy could be better implemented through regulations?

As set out in response to **Question 22** above, additional guidance should be contained within the PPG and nationally issued validation checklists should also be published.

24) Do you agree with the principles set out in DM3?

Partially Agree.

Policy DM3 is an important policy that should be as strong as possible to ensure that LPAs are working positively to approve sustainable development. All too frequently, applicants are receiving poor customer service from LPAs with a lack of contact with officers, a lack of opportunities to address any issues with an application during the determination period and often, no opportunities to amend schemes leading directly to a refusal of the application.

Policy DM3 should therefore set a series of rules which LPAs must follow during the determination period, to reach positive outcomes where possible. The LPDF therefore

⁵ [Statutory Consultee System Reforms - LPDF Jan 2026.pdf](#)

considered that the word 'should' in Policy DM3(1), should be replaced with the word 'must'. These are important principles for the determination of all planning applications and therefore, this policy should be as strong as possible in its wording.

25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed?

Strongly disagree.

Revisions to the Framework that restrict when viability submissions can be made risk undermining the delivery of many development sites, directly conflicting with the Government's ambitions for increased housing supply. Whilst it is understood that some sites are assessed in a broad, generic way during Local Plan examinations, many schemes have unique characteristics that require bespoke consideration. In such cases, viability discussions are essential to enable development to proceed.

Development viability remains a major constraint on housing delivery and without effective mechanisms to address viability challenges, housing delivery will be negatively impacted as a result. Viability pressures can affect every form of development and every type of developer, acting as a significant deterrent to external investment, limiting the growth of housebuilders, constraining SMEs delivery and growth and ultimately, reducing the number of homes built.

These pressures have intensified over time due to rising build costs, limited revenue growth, higher borrowing costs, and an expanding list of regulatory and policy requirements. These include enhanced building regulations, biodiversity net gain (BNG), substantially increased Section 106 (S106) obligations, the Community Infrastructure Levy (CIL), the Building Safety Levy (BSL), and reduced interest from registered providers (RPs) for S106 affordable housing. Unless market conditions improve significantly, viability will remain constrained, influenced by factors such as sales values, sales rates, affordable housing income and availability, build cost inflation, and development finance conditions.

A fundamental weakness of Local Plan viability testing is that it often fails to include adequate allowances for infrastructure provision and abnormal costs. LPAs evidence bases frequently rely on optimistic assumptions which results in overstated viability outcomes. Therefore, viability assessments at the application stage should be accepted as a normal and necessary part of the planning process and should not be restricted to exceptional cases.

26) Do you have any further comments on the likely impact of policy DM5: Development viability?

No.

27) Do you have any views on how the process of modifying planning obligations under S106A, where needed once a section 106 agreement has been entered into, could be improved? a) 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.

There remains significant uncertainty across the sector about the correct process for modifying or discharging planning obligations on viability grounds.

The advantage of reinstating Section 106BA would be that it enables developers to modify planning obligations via a significantly easier process than relying upon a S73 application. This would particularly benefit SME housebuilders and would help to unlock schemes that have stalled due to viability challenges.

28) Do you have any views on how the process of modifying planning obligations could be improved in advance of any legislative change, noting the government's commitment to boosting the supply of affordable housing. a) If so, please provide views on the current use of s73 and, if any, the impact on affordable housing obligations.

See response to **Question 27** above.

29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations?

Strongly Agree.

The LPDF strongly supports the use of model conditions and obligations in the planning process in order to simplify the planning application process for all parties, to speed up the decision-making process and to introduce a degree of consistency of approach across the country.

30) Do you agree that policy DM7 clarifies the relationship between planning decisions and other regulatory regimes?

Partially Agree.

However, the LPDF considers that this policy should be worded as strongly as possible to ensure that other regulatory regimes perform their functions as anticipated, rather than relying on the planning system to deliver solutions that are required to resolve their own failures. For that reason, the final sentence of Policy DM7(1) should read, "Decision makers **must** assume, unless there is clear evidence to the contrary, that those separate regimes will operate effectively".

31) Do you agree with the new intentional unauthorised development policy in policy DM8?

The LPDF has no comments on this question.

32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider? a) If so, are there any particular additions or mitigations which we should consider?

No.

33) Do you agree with the new Article 4 direction policy in policy DM10?

The LPDF has no comments on this question.

34) Do you agree with the proposed approach to setting a spatial strategy in development plans?

Strongly Agree.

The LPDF agrees in principle with the proposed approach; however, a specific reference to business land and premises is required, as currently the phrasing diminishes the importance of planning for commercial land by simply subsuming this as part of 'other uses'. We believe this conflicts with the entire approach of the government and the proposed NPPF to have an economic growth agenda, as well as the intention to align SDS and local plans with the Industrial Strategy.

Moreover, the LPDF agrees that the development needs for business land and premises (and other uses) should be identified as a minimum and in principle by the SDSs, and when the SDS is not in place, by local plans, and, more importantly, should include any needs that cannot be met within neighbouring areas.

On this basis, the following additions are proposed to elevate the importance of considering the development needs for business land and premises in Policies S1 and S2:

- *S1 para 1 part a “Seeking to meet the development needs of their area as a minimum. For spatial development strategies, and for local plans where a spatial development strategy is not in place²², this means providing for objectively assessed needs for housing, **business land and premises**, and other uses (including supporting infrastructure), as well as any needs that cannot be met within neighbouring areas, unless...”*
- *S2 para 1 part d “Sites allocated for development to meet the identified need for housing, **business land and premises**, and other uses in the area and for local and strategic infrastructure (including any proposals to enable the development of land around stations).”*

35) Do you agree with the proposed definition of settlements in the glossary?

Strongly Agree.

36) Do you agree with the revised approach to the presumption in favour of sustainable development?

Strongly Agree.

37) Do you agree to the proposed approach to development within settlements?

Strongly Agree.

The LPDF particularly supports the language used in Policy S4 which sets out that development should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects.

38) Do you agree to the proposed approach to development outside settlements?

Partially Disagree.

The LPDF supports the positive approach to development outside settlements which is set out in Policy S5. This policy has the ability to significantly increase the delivery of new homes and employment in sustainable locations to meet the Government's ambitions.

Co-locating development with transport hubs is a sensible strategy where it genuinely enhances access to jobs and services. However, the draft policy currently relies on narrow and outdated proxies for connectivity and, as drafted, risks limiting housing growth and entrenching regional disparities.

The draft policy uses "Well-connected stations" as proxy for a "high level of connectivity to jobs and services". This is problematic.

Rail does play an important strategic role, particularly in linking large labour markets. However, economic participation depends on overall accessibility, not solely on rail proximity:

- Bus networks are fundamental to labour market access, particularly for lower-income households and service-sector workers.
- Cycling supports access to employment while delivering health and resilience benefits.
- Walking and wheeling are the first choice of sustainable travel, available to all.
- Digital connectivity enables remote working, flexible business models and access to services without travel.

By privileging rail-served locations, the policy risks:

- Undervaluing major bus corridors.
- Excluding employment areas not proximate to rail.
- Disadvantaging lower-income and key workers.
- Reducing network resilience by concentrating development around a single mode.

A genuinely vision-led policy would assess multi-modal accessibility to employment and services, rather than simply station proximity alone.

The LPDF welcome the absence of a rigid numerical threshold when it comes to the definition of a ‘reasonable walking distance’ which is used as a criterion within Policy S5.

However, the Minister’s oral statement to Parliament on 16 December 2025 referenced a ten-minute or 800-metre distance from a station, and the draft Design and Placemaking Planning Practice Guidance (PPG) states that “people are usually prepared to walk up to 10 minutes (about 800 metres) to a railway station or tram stop” (paragraph 113).

In reality, the distance that people would be willing to walk to a railway station will vary by variables such as:

- Nature and quality of the public transport service;
- Attractiveness of the walk and how safe it feels;
- Gradient of the route;
- Quality of the stop (including provision of shelters and benches); and

Therefore, these 800m references may, in practice, encourage some local authorities to treat this as a rigid maximum rather than a context-sensitive measure. As a result, development located marginally beyond this distance could be unnecessarily constrained, despite the absence of a fixed threshold in the proposed wording.

While it is appropriate to prioritise sustainable locations, an 800-metre benchmark is overly restrictive in many contexts. Evidence shows that 76% of rail users live beyond a ten-minute walk from their nearest station⁶ and 70% of residents in England live more than a (longer) fifteen-minute walk from their nearest railway station. In addition, 64% of local authorities already consider distances greater than 800 metres to be acceptable for new development⁷.

By defining accessibility solely using walking distance, the current wording does not allow for other sustainable transport modes to be considered, for example travelling by bus or cycling. By excluding multi-modal accessibility from the criteria, the proposed policy wording could misrepresent genuine connectivity and unduly constrain appropriate development opportunities by restricting potential land that could be considered.

If cycling were included as an alternative sustainable connectivity measure (to be included as ‘active travel’), then five minutes cycling at below average speed would make developments within 1,200m of a train station reasonably accessible.

This wider consideration of connectivity could therefore more than double the land that could be considered leading to a potential 1.4m homes rather than the current 633,000⁸.

If the measure of reasonable distance was widened further, proposed new developments could for example provide a new bus route as a reasonable sustainable travel alternative. If bus connections were considered, a threshold of 3,000m would be a reasonable

⁶ DfT, 2018, Public attitudes towards train services survey. (para 2.8)

⁷ p14. www.walkwheelcycletrust.org.uk/media/10520/walkable-neighbourhoods-report.pdf

journey of approximately 10 minutes (at suburban bus speeds of 11mph). This would open a potential 500,000 hectares of eligible land.

The draft policy states that “Well-connected rail stations and underground, tram and light rail stops are those in a top 60 Travel to Work Area (TTWA) located partially or fully within England by Gross Value Added (GVA)”.

These metrics reflect historic patterns of economic activity and commuting. TTWAs are derived from 2011 Census travel-to-work data and are therefore rooted in labour market geographies that pre-date significant structural change. They do not reflect the rise in home and hybrid working, which has altered commuting intensity, direction and frequency. If recalculated today, many urban TTWAs may show weaker levels of self-containment because a greater proportion of residents now work remotely, even where their employer remains locally based. Conversely, some rural and smaller towns may exhibit relatively stronger self-containment than in 2011. Therefore, basing future housing distribution on 2011 TTWAs risks misaligning development locations with contemporary and emerging economic patterns.

Using the top 60 TTWAs ranked by GVA further concentrates development in already successful areas, limiting opportunities in smaller or emerging labour markets and potentially reinforcing regional disparities. This threshold is arbitrary and the policy is sensitive to this cut-off point.

In research undertaken by Lichfields entitled ‘All Aboard or Stuck Between Stations’⁹ they conclude that up to 854,000 additional new homes could be delivered, if the definition was widened around the frequency of service and the Travel to Work Area (TTWA) criteria.

The Lichfield’s research also cites several examples of locations which would be excluded by the current top 60 TTWA criterion including Cheltenham and Newbury, and the LPDF would also highlight areas such as Bath, Bedford (where consent has recently been granted for Europe’s largest theme park), Doncaster, Worcester, Colchester which are similarly excluded. The approach which uses the top 60 TTWA is therefore flawed, severely limits the effectiveness of the policy and creates anomalies with other elements of the Government’s growth agenda such as the focus on New Towns.

Whilst we therefore disagree that the use of TTWAs is an appropriate metric for the policy test, if it is retained, the LPDF consider that the threshold should be uplifted to the top 100 TTWAs ranked by GVA and the test should be reworded to account for stations with services into a top 100 TTWA (within a reasonable journey time), rather than only stations within a top 60 TTWA. This would widen the impact of the policy, would ensure it better aligns with other Government initiatives such as the Ox-Cam Corridor and New Towns, and would increase the regional parity impact of the policy with more stations outside those in the Southeast of the country being brought within the definition.

The draft policy also includes reference to stations which, in the normal weekday timetable, are served (or have a reasonable prospect of being served) throughout the daytime by four trains or trams per hour overall, or two trains per hour in any one direction.

⁹ [All aboard or stuck between stations? How the new NPPF might unlock growth around rail stations](#)

The use of this frequency threshold in the policy is too simplistic. It does not account for stations that have a low frequency because demand is currently low, because of a low surrounding population for example.

The stated metrics also fail to account for off-peak frequency – shift work, off-peak employment, care work and irregular hours are often poorly served by rail, even where frequency is high at peaks.

If the threshold for eligibility was widened to stations that had two departures each way during peak hours (6:30–9:30 a.m. and 4–7 p.m.) and in the top 100 TTWAs by productivity, this could be as much as 80,000 hectares of non-built up, unconstrained land leading to a capacity of up to 2.4 million potential homes.

Suggested Wording Changes to Policy S5(1)(h)

“h. Development for housing and mixed-use development which would be: located where it can support sustainable patterns of movement and make effective use of existing or proposed transport infrastructure, reflecting the principles in Policy TR3. A range of qualitative and quantitative evidence should be used to inform the assessment and selection of sites for development and appropriate densities;”

These changes would need to be reflected in Policy GB7(1)(h)(i) which should be amended to read:

“(i) be located where it can support sustainable patterns of movement and make effective use of existing or proposed transport infrastructure, reflecting the principles in Policy TR3;”

Footnote 26 should also be amended to reflect the widened criteria as discussed above and should read:

“Well-connected rail stations and underground, tram and light rail stops are those in a top ~~60~~ 100 Travel to Work Area located partially or fully within England by Gross Value Added (GVA) and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains or trams per hour ~~overall~~, or two trains or trams per hour in any one direction ~~during the peak period and at least two trains or trams per hour, or one train or tram per hour in any one direction, during the off-peak period.~~”

The impact of these minor amendments to the criteria used for eligibility under Policy S5 could be significant and could assist the Government greatly in achieving significant levels of housing and economic growth in a sustainable manner. The LPDF asked Lichfields to assess the potential impacts of the variations in the criteria on the amount of land that could be available if the definitions were widened. The output from this work can be found in Appendix 2 of this representation.

New Settlements

In addition, the wording of Policy S5 as currently drafted may cause difficulties for delivering new settlement proposals. At paragraph 77 of the current NPPF (December 2024), there is explicit support for new settlement planning through the strategic policy making. This support is reflected in the draft NPPF plan making policy HO4.

Under the NPPF 2024, proposals for new settlements can also be promoted outside of the plan making process with reference to paragraph 11 and the 'presumption in favour of sustainable development'. This decision-making mechanism is an important tool in situations where the plan making process has broken down or is delayed. Allowing appropriate schemes to advance through the development management process has very clear benefits in respect of housing land supply.

The current draft NPPF has effectively removed a mechanism for the principle of a new settlement to be accepted through the development management process. Policy S5(j), cannot be applied to new settlement proposals as it introduces a requirement for development to be 'well related to an existing settlement' which, by definition, is extremely challenging when applied to a new settlement scenario.

This can be simply addressed through a minor wording change to Policy S5 to help bring forward new settlements. This amendment to Policy S5(1)(j)(i) should read:

*“(i) be well related to an existing settlement **or be a sustainable new settlement in its own right** (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure”*

39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria?

See our response to **Question 38** above.

The LPDF welcomes the proposed Policy S5 para 1 part j and the explicit reference “to major development for storage and distribution purposes which accords with policy E3”. However, the LPDF considers that the policy as drafted presents this as something of a ‘bolt-on’ to housing considerations and has not fully captured the factors that shape requirements for business land and premises.

On this basis, the LPDF believes that business land and premises considerations should be elevated to their own specific part within the policy where Policy S5 is also engaged, including reference to modern economy and priority sectors in the Industrial Strategy as an additional criterion. These changes are set out below:

- *S5 para 1 part j “Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites²⁷ or scores below 75% in the most recent Housing Delivery Test²⁸), and where the development would ~~+~~ be well related to an existing settlement²⁹ **or be a sustainable new settlement in its own right** (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; ~~or~~*
- *S5 para 1 part k (new) ~~ii~~ Development which would address an evidenced unmet need for business land and premises, including but not limited to where the development would:*

- *meet the needs of a modern economy and the Industrial Strategy priority sectors, which accords with policy E2; or*
- *comprise major development for storage and distribution purposes, which accords with policy E3”*

40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

Partially Agree.

Please see our response to **Question 38** above and to **Q121** below.

The NPPF's overarching objective of ensuring land is used effectively and efficiently is laudable and welcomed. However, Policy L3 introduces minimum density standards for residential development in highly connected locations and states that proposals failing to make efficient use of land should be refused. While the ambition to optimise land use in such areas is laudable, the current wording of Policy L3 would benefit from additional nuance. Local housing needs and market demand vary over time and between places. In some locations, there may be a clear requirement for larger family homes, which may not align with the prescribed minimum density thresholds. Policy L3 should therefore incorporate sufficient flexibility to reflect these differing local circumstances and changing market conditions in the medium to long term to ensure that these minimum density standards do not adversely affect housing delivery.

Additionally, sites located within the urban area may well be able to deliver higher densities, that will be more in keeping with the surrounding area. However, many sites that are in sustainable locations, will be situated on the edge of existing settlements, as this is where the bulk of available undeveloped land is located. The nature of these locations is that they are transitional zones between the built environment and the countryside. These areas are naturally lower in density and therefore, development at 40dph or 50dph, would not necessarily respect the character of the surrounding area. This could therefore cause a conflict between achieving the density criteria of Policy L3 and achieving good design policies which require development to be in keeping with the character of the local area. Additionally, a density of 50dph is likely to include a significant element of apartments, and this may cause an issue for the provision of affordable housing as Registered Providers are often not willing to take on this type of accommodation in these locations. The increased build cost associated with apartment development, would also add significantly to viability issues on sites, especially where high levels of affordable housing are required. On these sites many purchasers / occupiers desire is for a house and therefore planning needs to also recognise market demand dynamics within its formulation.

Density is therefore an issue which needs to be considered in context on a site-by-site basis and, as a consequence, there needs to be flexibility built into Policy L3 to ensure that proposals are designed with a density which fits with the character of an area whilst maximising the use of land. There also needs to be consideration of what the market requirement for the various types of homes is, as high density schemes equate to apartment style delivery and there may not be a market for such properties in all

locations. This could lead to schemes being undeliverable as a result. Therefore, criteria L3(4) should be removed from this policy as it does not provide sufficient flexibility.

Finally, if the Government decide to introduce any density requirements as part of the new NPPF then they need to consider introducing a transitional period for applications which are already in the system prior to its introduction. As the intention is that the NPPF will bite from the date of publication, introducing any density or other new requirements that will bite upon schemes that are already in the system (applications or appeals), could cause significant delay as those schemes are revisited to take account of the new requirements. This would mean delay in delivery of new homes which would detrimentally impact on the Government's ability to meet its overall objectives.

41) Do you agree that neighbourhood plans should contain allocations to meet their identified housing requirement in order to qualify for this policy?

Partially Agree.

However, the LPDF considers that Policy S6 of the draft NPPF, which relates to Neighbourhood Planning, should be amended to revert to wording that gives protection to Neighbourhood Plans where:

*“the neighbourhood plan became part of the development plan **two years or less** before the date on which the decision is made”* (emphasis added) or,

Alternatively, the wording of the Policy should be amended to ensure that Neighbourhood Plans are in general accordance with an up-to-date Local Plan or the National Development Management Policies.

Many Neighbourhood Plans will have been prepared before the 2025 version of the NPPF is adopted, and these will not have taken account of the Government's new objectives to increase economic growth, commercial development and to deliver 1.5 million new homes over this Parliament. If Policy S6 remains as currently drafted in the NPPF consultation, then this could seriously frustrate the Government's ability to meet its objectives as it will take time for existing Neighbourhood Plans to be reviewed and updated in line with the new NPPF.

Reverting to the wording detailed above would ensure that existing Neighbourhood Plans are updated as quickly as possible to take account of the Government's new objectives, and this will ensure that they do not frustrate economic growth in areas where existing Neighbourhood Plans are out of line with current Government policy.

42) Do you agree with the approach to planning for climate change in policy CC1?

Partially Agree.

However, the wording of paragraph 1(a)(i) should be amended to remove the word 'radical' as this is subjective, open to wide interpretation and is likely to create an inconsistency of approach across the country. It would still be a positively worded policy which addresses climate change with the wording “..can help to contribute to reductions in greenhouse gas emissions.”

43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

Partially Agree.

However, it is not clear if all the criteria in Policy CC2 need to be met or if it is to be left to planning judgement based on an overall assessment of the policy. The LPDF considers that the latter should be the approach adopted by the policy.

44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

Strongly Agree.

45) Does the policy on wildfire adaptation clearly explain when such risks should be considered and how these risks should be mitigated?

The LPDF has no comments on this question.

46) How should wildfire adaptation measures be integrated with wider principles for good design, and what additional guidance would be helpful?

The LPDF has no comments on this question.

47) Do you have any other comments on actions that could be taken through national planning policy to address climate change?

No.

48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate?

Strongly Agree.

The LPDF support Policy HO1, especially the need for SDSs to be based on a housing need assessment that establishes the overall number of homes needed in the area **as a minimum** (emphasis added). We also strongly support the statement in Policy HO2 that housing requirements set in SDSs should not be re-tested as part of local plan preparation. We also support the criteria that the housing requirement in local plans should be set higher than the figure in the local housing needs assessment where appropriate, and that local plans should set an indicative figure for housing needs in neighbourhood planning areas, avoiding setting this at nil unless very specific conditions apply.

49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing?

Strongly Agree.

Further national guidance is clearly required as it is essential to ensure consistent, robust, and equitable assessment of needs across LPAs. Current practice varies

significantly, and many authorities lack the capacity or specialist expertise to undertake high-quality housing needs assessments. Further guidance would significantly strengthen the evidence base for inclusive planning and reduce the risk of inconsistent or inadequate provision.

The lack of up-to-date guidance on how to calculate affordable housing need has led to many assessments concluding that affordable housing need will be addressed through the overall need figure identified. As a result, there is often limited effort to robustly understand the nature, scale, and tenure specific profile of affordable housing need in the first place. This is compounded by the fact that there is still no requirement to plan to meet affordable housing need in full, including in this consultation. Instead, it is typically considered only in the context of “likely delivery.”

The effect is that LPAs identify a figure but are not required to align the spatial strategy, site allocations, or delivery mechanisms to meaningfully address it. Over time, this risks embedding a system in which affordable housing need is acknowledged in evidence but not translated into policy or delivery, weakening both the credibility of the evidence base and the ability of the planning system to respond to the households it is intended to support.

There is therefore a need for guidance to require the assessment of need for all rental tenures, including affordable private rent for households who meet the definition of affordable housing need but are unable to access social or affordable rented housing due to restrictive allocation policies. In many areas, eligibility criteria such as residency requirements, priority bands, or local connection tests, limit access to traditional affordable rented products. Without recognising this cohort, needs assessments risk overlooking households who require genuinely affordable provision but are not able to access it through the existing allocation framework. A more comprehensive approach would ensure that the full spectrum of rental options is considered in responding to identified need.

Guidance should also explicitly require the consideration of Right to Buy losses, both in calculating need and in monitoring delivery. It is illogical to assess net need against gross completions, particularly in areas where Right to Buy sales result in a net loss of affordable housing stock. In many authorities, a significant proportion of new affordable supply is offset each year by homes sold through Right to Buy. Where these losses are not fully captured in needs assessments, the baseline level of affordable housing need is understated from the outset. Equally, where delivery is monitored on a gross basis, reported performance can suggest progress even where the overall affordable housing stock is stagnating or declining in net terms.

As a result, the current approach creates a structural misalignment between evidence, policy, and outcomes. Plans may appear to be responding to need, and delivery may appear to be taking place, while the actual availability of affordable homes for those in need is not improving and may in fact be worsening. Without explicitly accounting for Right to Buy losses, both the scale of need and the level of intervention required to address it will be consistently underestimated. This is further complicated by the fact that the term net, in an affordable housing context, is not clearly defined in either legislation

or national policy, creating ambiguity that allows losses through Right to Buy to fall outside of need calculations and monitoring processes.

(a) If so, what elements should this guidance cover?

Overall, there is a need for:

- Clear methodological expectations for assessing the needs of older people, disabled people, Gypsies and Travellers, and households requiring social and affordable housing, including requirements to integrate demographic projections, local health data, and socio-economic indicators.
- Requirements for engagement with representative groups, ensuring that lived experience informs assessments and that seldom heard groups are meaningfully involved.
- Integration with the Public Sector Equality Duty, ensuring that needs assessments directly inform policy choices, site allocations, and development management decisions.

With particular regard to affordable housing, guidance should be updated to address the following elements:

- **A standardised national methodology:** Guidance should set out a clear national approach to assessing affordable housing need, aligned more closely with the Standard Method for overall housing need. This should reduce variability between authorities, improve transparency, and ensure that affordable housing evidence is produced on a consistent and comparable basis.
- **Publicly available data:** All datasets required to assess affordable housing need should be publicly available. The methodology should rely on transparent, nationally accessible data sources so that assumptions can be scrutinised and allow inputs to be easily updated. Authorities should not be required to rely on proprietary datasets to undertake the required methodology.
- **Clear treatment of different tenures:** Guidance should require a clear assessment of need across all affordable housing tenures, including social rent, affordable rent, and affordable home ownership. It should also provide a method for distinguishing between them, recognising that each tenure addresses different forms and depths of housing need and should not be treated as interchangeable. This includes non-traditional rental tenures such as affordable private rent, for households who meet the definition of affordable housing need but are unable to access social or affordable rented housing due to restrictive allocation policies.

- Alignment with homelessness legislation and welfare policy: Guidance should clarify how households whose needs are being met in the PRS through homelessness duties and Housing Benefit should be treated. It should make clear that the PRS is not an affordable housing tenure in national policy and that such households may still represent unmet affordable housing need.
- Consideration of allocation policies and access in practice: Guidance should require evidence to reflect real world access to affordable housing, including the effect of local allocation policies, residency requirements, and eligibility thresholds. This would ensure that assessments reflect not only theoretical need but the ability of households to access provision in practice.
- Accounting for stock losses: Guidance should explicitly require Right to Buy and other stock losses to be taken into account both when calculating affordable housing need and when monitoring delivery, so that assessments reflect changes in the size of the affordable housing stock rather than simply recording gross completions.
- Projection over the plan period: Guidance should provide a workable and proportionate method for projecting affordable housing need over the plan period, ensuring that evidence bases support plan making rather than relying solely on a snapshot of current need.
- Stronger link between evidence and plan making: Guidance should clarify the role of affordable housing need in shaping spatial strategy, site allocations, and policy. The assessment of need should not sit in isolation but should directly inform how plans respond, ensuring that the identification of need leads to meaningful policy and delivery responses rather than becoming a largely procedural exercise.

50) Do you agree with the approach to incorporating relevant policies of Planning Policy for Traveller Sites within this chapter?

The LPDF has no comments on this question.

51) Is further guidance needed on how authorities should assess the need for traveller sites and set requirement figures? a) If so, what are the key principles this guidance should establish?

The LPDF has no comments on this question.

52) Do you agree the new Annex D to the draft Framework is sufficiently clear on how local planning authorities should set the appropriate buffer for their local plan 5-year housing land supply?

Strongly Agree.

53) Do you agree the new Annex D to the draft Framework is sufficiently clear on the wider procedural elements of 5-year housing land supply, the Housing Delivery Test and how they relate to decision-making?

Partially Agree.

However, the Government should commit to the publication of the HDT information on an annual basis by a specific date each year. This will assist in transparency and consistency of decision making.

54) Do you agree the requirements to establish a 5 year supply of deliverable traveller sites and monitor delivery are sufficiently clear?

The LPDF has no comments on this question.

55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear?

Partially Agree.

Although it may be helpful to include the words, “where appropriate” in HO4(1), as not all Local Plans will be able to or need to allocate large-scale residential sites.

56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing?

Partially Agree.

It is not considered that the requirement for areas to have a population density of 2 persons per hectare or less is required, as this makes the assessment process too complex. If an area has a population of less than 3,000, then it should be considered to be rural.

There also needs to be flexibility in how affordable housing tenure is approached in rural areas. RPs are not always willing or able to take on isolated or very small clusters of affordable homes, particularly where management costs are high, stock is dispersed and long-term maintenance liabilities are disproportionate. In some rural contexts, a rigid tenure expectation may undermine deliverability. A more flexible approach, including the appropriate use of intermediate and affordable home ownership products alongside social rent where justified, will help ensure schemes are viable and capable of being delivered.

57) Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards?

Partially Agree.

However, it needs to be set out in the policy that any proportion proposed should be based upon robust local evidence and subject to viability testing through the local plan viability assessment.

58) Do you agree 40% of new housing delivered to M4(2) standards over the plan period is the right minimum proportion? a) Please provide your reasons, and would you support an alternative minimum percentage requirement?

Strongly Disagree.

The level of new housing which needs to meet M4(2) standards should be determined on robust local evidence, tested through the local plan examination process and subject to viability testing through the local plan viability assessment.

59) Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate?

Partially Agree.

However, the need for such provision should be based on robust local evidence and be tested through the local plan examination process, including through the viability assessment to ensure that they can be realistically delivered.

Overall, the proposals are proportionate in principle, but their success will depend on:

- Robust viability testing at plan making stage to ensure deliverability and establish clear expectations;
- Strong alignment between evidence, allocations, and delivery mechanisms;
- Flexibility to respond to changing funding and market conditions; and
- A continued emphasis on integrated provision within mixed communities rather than standalone or isolated allocations.

60) Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more? a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?

Strongly Disagree.

The LPDF considers that the threshold set out in Policy HO5(1)(d) of 150 homes is too small to deliver an extensive range of tenures. The threshold should be increased to at least 500 homes. At 150 homes, if the requirement on the site is for 40% affordable housing, this only leaves 90 homes to be delivered by the developer for private sale. If the threshold is left at 150 units, this could mean that sites of this size are undeliverable as there would be too few market value units left for sale to make the site viable and worthwhile to deliver.

Any assessment of need that is required to support this policy would be a 'snapshot in time' and is likely to be years old by the time any development is brought forward. It won't take account of the requirements of Housing Associations (and other delivery partners) or their funding availability at the time the site is delivered so as written, the policy is too

prescriptive, and flexibility is needed to ensure the housing mix reflects the up-to-date context.

61) Do you agree with proposals for authorities to allocate land to accommodate 10% of the housing requirement on sites of between 1 and 2.5 hectares?

Partially Disagree.

The LPDF strongly believes that small and medium sized sites, delivered predominantly by SME housebuilders, have a fundamental role to play in the country delivering the scale of homes needed to meet the Government's objective of 1.5 million homes in the next 5 years. The recent CMA report has highlighted the significant issues faced by our SME builders and we believe it is of great importance that these issues, particularly those relating to national planning policy, are addressed through these current NPPF reforms.

With this in mind, we refer you to a Savills report from June 2024, which the LPDF commissioned alongside Richborough, 'Land Matters: the critical role of sales outlets in boosting housing supply'¹⁰

This analysis shows that delivering 1.5 million homes over the next 5 years is only achievable through a focus on bringing forward additional sites for up to 250 homes. Sites of this size are less complex, likely to involve only one landowner, and require less supporting infrastructure. They therefore start to deliver new homes much sooner than larger scale sites.

On top of this, several small sites can deliver more homes more quickly than one larger site that adds up to the same total number of new homes. A site of 500 homes may only have one or two sales outlets, selling 30 to 50 homes per year. Five sites in different locations with different products being built, each with 50 homes, could deliver 150 to 250 homes per year at the same sales rate per outlet. Capital investment in smaller sites is therefore recycled faster.

The data from research by Savills for the LPDF highlights that applications / consents between 2017 and 2023 have fallen significantly for all site sizes below 100 dwellings (52% fall). The LPDF believes that the medium sized site definition should be higher at 69 or 79. However, if 49 is to be adopted as a starting point we believe there are certain principles which need to be clarified if the Government is to maximise benefits for SMEs:

- The Government needs to provide strong guidance to LPAs and their officers / consultees on the meaning within the NPPF of 'appropriate' and 'proportionate'. The cost of unnecessary supporting information is one reason why SMEs are 'excluded' from participating in the planning process. The opportunity should be seized to enable outline permissions to require the minimum of information to enable a decision to be made for small and medium sized sites;
- That the requirement to identify in Local Plans 10% of delivery from medium sized sites is wholly inadequate. For instance, in an LPA with a 700 pa housing requirement, 70 homes should come through medium sized sites at 10%. If

¹⁰ [Land Matters Final.pdf \(lpdf.co.uk\)](#)

there is a 30% Affordable Housing requirement then this would require only 2 sites at the upper end of the size range. This is not the step change in land availability that would be necessary to see an expansion of delivery from SMEs;

- That Footnote 70 to Policy N4 and N5 is amended to indicate that small and medium sized sites are unlikely (it is still a matter for the decision maker but there is an indication that national policy views the delivery of these sites as important) to be viewed as ‘major development’;
- That the delivery of small and medium sized sites is accorded a specific positive weight in the planning balance.

In recognising the need to increase the delivery of sites of less than 50 units, the LPDF would recommend amending the NPPF policy to ensure that local plans allocate a significant proportion of their housing requirement (up to 25%) of development proposed in local plans as medium sized sites.

The requirement for small site allocations should also be increased from 10% to 15% of the housing requirement to provide for a boost in delivery from small developers who rely on very small-scale sites to survive.

62) Are any changes to policy HO7 needed in order to ensure that substantial weight is given to meeting relevant needs?

Yes.

The LPDF strongly supports the use of the term ‘substantial weight’ in this Policy and the need for any requirements to be based upon up-to-date local housing need assessments. It may be beneficial to set out what the Government consider to be up-to-date (e.g. no more than 2 years old) and more guidance could be provided on how Local Housing Needs Assessment should be carried out, as there is significant variation of approach across all LPAs, particularly on how they deal with Housing Waiting lists and their inclusion in the definition of need within the assessment.

Policy HO7 would also benefit from:

- Clearer articulation of how “substantial weight” is intended to operate within the planning balance, including whether it represents the top end of the weighting scale (this could be set out in the PPG);
- Guidance on proportionality so that materially different scales of need are not treated as equivalent;
- A clear definition of “local community” to avoid inconsistent geographic interpretation, which in our view should be aligned to the local plan area to ensure consistency, proportionality, and reliance on robust and readily available datasets; and
- Direction on the evidential standards required to establish relevant need, including the status of parish level survey.

63) Do you agree that proposals to add military affordable housing to the definition of affordable housing, and allow military housing to be delivered as part of affordable housing requirements, will successfully enable the provision of military homes?

The LPDF have no comments to make on this question.

64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing?

Partly Disagree.

The intention behind the proposal to support affordable housing delivery by allowing greater flexibility in the size of market homes is recognised. However, in practice this is unlikely to address the primary barriers to delivery. Experience indicates that the key constraints on bringing forward affordable housing are more typically related to infrastructure costs, tenure mix requirements, land values, and viability pressures, rather than the size of market units.

Introducing flexibility around the size of market homes will not automatically translate into increased affordable housing provision and risks focusing on a secondary issue rather than the structural factors that most directly influence delivery. Without addressing the cumulative impact of infrastructure contributions, abnormal costs and viability constraints, changes to market unit size alone are unlikely to materially increase affordable output.

While allowing smaller market homes may increase the number of units delivered on a site, it could also lead to a market offer that does not reflect the size and type of homes required in a particular area, particularly where there is need for family housing.

More broadly, measures that increase overall housing supply are likely to have a greater impact on affordable housing delivery than flexibility around market unit size alone. Policies that support development in accessible locations, improve infrastructure alignment, and strengthen the plan led allocation of sites are likely to be more effective in increasing both market and affordable housing delivery over time.

**65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes?
a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?**

No.

Registered Providers (RPs) are currently facing significant difficulty in bidding for S106 affordable housing because of a number of complex factors, one of which is the mix of units that are required to be provided through the implementation of the permission. Simply increasing the number of social rented properties is only likely to increase the difficulties faced by RPs which will delay the delivery of schemes significantly.

66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards? a) If so, what changes would be beneficial?

Yes.

Changes to national planning policy would help ensure that affordable temporary accommodation, including stepping stone housing, is appropriately supported and deliverable in practice.

There is a clear case for introducing targeted policy support that recognises the distinct role of stepping stone and other forms of temporary accommodation within the housing system particularly in supporting move on from homelessness, reducing reliance on unsuitable temporary placements, and providing a pathway into settled housing. This should include explicit recognition in national policy and clearer alignment with local housing and homelessness strategies.

Temporary accommodation should be recognised as a necessary and legitimate component of the housing system rather than an exceptional or short-term intervention. National policy could clarify how such provision should be treated in relation to housing requirements, land allocation, and development management decisions, providing greater certainty for authorities and delivery partners.

67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer. b) If you do not believe applicants should have blanket discretion to discharge social and affordable housing requirements through commuted sums, do you think cash 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.

Strongly Agree.

A significant problem facing the industry at present is a lack of appetite from RPs for s106 affordable housing. This is rendering numerous developments non-viable and/or simply non-deliverable in many circumstances.

Therefore, there should be a recognised process that developers can go through for medium sites to demonstrate that RP interest does not exist for their affordable units, at a commercially acceptable level, which will allow the developer to revert to a suitable payment in-lieu.

Any such approach would require clear safeguards to ensure that contributions are transparently secured, ring fenced and deployed within a reasonable timeframe.

67a) If so, would it be desirable to limit the circumstances in which cash contributions in lieu of on-site delivery can be provided – for example, should it not be permitted on land released from the Green Belt where the Golden Rules apply? Please explain your answer.

For the reasons provided above, cash contributions in lieu of on-site delivery would be appropriate where the applicant has demonstrated that insufficient demand from RPs exists. This approach should be available for both sites released from the Green Belt and for non-Green Belt sites alike.

This would provide a major boost to SME housebuilders, and their ability to secure investment and development finance, provided certainty exists in how the contributions are to be calculated which we recommend be defined within s106 agreements.

68) What risks and benefits would you expect this policy to have?

The key benefit of allowing developers to make commuted sum payments in-place of on-site affordable is that it will unlock numerous developments, that are ‘stuck’ in the planning process due to a lack of RP appetite, or simply because the bids are so low, that they result in viability issues, which obviously impacts upon delivery.

These changes would result in various significant positives for the housebuilding sector, including increased build out rates for both market and affordable housing, improved development viability, significant SME assistance, additional investment and increased availability of development finance.

69) What guidance or wider changes would be needed to enable Local Planning Authorities to spend commuted sums more effectively and more quickly?

Guidance needs to be published by the Government to assist LPAs on how to calculate realistic commuted sums which are viable and deliverable.

70) Would further guidance be helpful in supporting authorities to calculate the appropriate value of cash contributions in lieu? a) If so, what elements and principles should this guidance set out? Please explain your answer. For example, guidance could make clear that contributions in lieu should be an amount which 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.

For the reasons provided to **Questions 67-69**, it is extremely important that:

- Guidance is provided to LPAs to clarify when commuted sum payments should be accepted, in lieu of on-site affordable housing provision, and
- How these commuted sums should be calculated.

71) Do you support proposals to enable off site delivery where affordable housing delivery can be optimised to produce better outcomes in terms of quality or quantity?

Yes.

72) Do you agree the with the criteria set out regarding the locations of specialist housing for older people?

Strongly Agree.

73) Do you agree with the criteria set out regarding the locations of community-based specialist accommodation, including changes to the glossary?

Strongly Agree.

74) Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary?

Strongly Agree.

75) Do you agree the proposals provide adequate additional support for rural exception sites? a) Please provide your reasons, including what other changes may be needed to increase their uptake?

Partially Agree.

However, the Government should investigate the possibility of reinstating funding for rural housing enablers to assist communities in bringing forward rural exception sites.

76) Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site?

Strongly Agree.

The provision of First Homes was not a successful policy, as they do not work as an affordable housing tenure type and therefore, this requirement should be removed from the NPPF.

77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes? a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?

The LPDF do not wish to comment on this question.

78) Do you agree the proposals to set out requirements for traveller sites at policy HO12 adequately capture relevant aspects from Planning Policy for Traveller Sites, whilst ensuring fair treatment for traveller sites in the planning system?

The LPDF has no comments on this question.

79) Please provide your reasons, particularly if you disagree.

The LPDF has no comments on this question.

80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period?

Partially Disagree.

Despite many reports having been prepared debunking the land-banking myth including the Letwin Report (2018)¹¹, the CMA Housebuilding Market Study (2024)¹², and a series of reports prepared by Lichfields on behalf of the LPDF and HBF including ‘Taking Stock’¹³, ‘Tracking the Progress’¹⁴ and, Feeding the Pipeline’¹⁵ there is still a perception that housebuilders do not build out sites sufficiently quickly. To quote from the Working Paper, “*We know that slow build out rates are of great frustration to many local planning authorities*”; this statement is neither helpful nor based on factual evidence, as has been shown from the reports listed above.

The CMA looked at this issue in some depth through their Market Study and they clearly concluded that

“Overall, we do not consider that competition in the land market, or the land banks held by different housebuilders individually or in aggregate either locally or nationally, is significantly distorting competition between housebuilders in delivering houses. While it is likely that the amount of land being held in housebuilders’ land banks is above the level we would see in a well-functioning market, this is primarily a symptom of wider problems in the market, mainly driven by the time and uncertainty associated with obtaining planning permission. Artificially reducing the levels of land banks without addressing these underlying drivers would be most likely to have a negative effect on the amount of housing that is being built.”

The CMA went on further to state that:

“Given this conclusion, we do not propose any remedies directed at land banks.”

As the Government have started to address some of the underlying drivers which were highlighted by the CMA, if these changes are implemented properly, and other barriers in the system are tackled, then build out rates will increase as a result. Housebuilders only see a return on their capital employed when they sell houses. It therefore makes no economic sense for a housebuilder to delay delivery. However, housebuilders are unlikely to build homes which they cannot sell, so they do need to pay careful attention to wider economic conditions such as mortgage interest rates and mortgage availability, to gauge so-called ‘market absorption rates’.

For these reasons, it is welcomed that Policy HO13 refers to the consideration of ‘absorption rates’ and that any use of planning conditions requiring a shorter implementation period must consider overall implementation of the scheme and viability.

¹¹ [Letwin_review_web_version.pdf](#)

¹² [Housebuilding market study final report](#)

¹³ [Taking stock -LPDF - HBF Research - May21 Final-compressed \(1\).pdf](#)

¹⁴ [Tracking Progress - Insight - Sept 21.pdf](#)

¹⁵ [Feeding the Pipeline Research.pdf](#)

The LPDF also firmly considers that the best way in which the Government can increase housing delivery, is by ensuring that we have countrywide coverage of up-to-date local plans and that those local plans allocate a wide variety of sites, in a geographical spread of locations, and of varying sizes, to allow volume housebuilders and SMEs numerous opportunities to deliver. This should be supported by an efficient and effective Development Management process which provides certainty and consistency of outcome and allows for decisions to be made within statutory timeframes. It also needs Government demand-side support, in the form of an equity loan scheme, to stimulate first-time buyers to enter the market and to give confidence to the housebuilders to increase delivery to meet that increase in demand.

The case for demand support is articulated clearly in the latest research from Savills¹⁶ on behalf of the LPDF indicates that although average sales rate reported by PLC housebuilders show signs of recovery, smaller firms delivering less than 1,000 homes per year, have been hit much harder, seeing no improvement in sales rates over recent months.

Sales rates at the current level are a major threat to the survival of many of these smaller housebuilders and as a result, the SME sector is shrinking. Housebuilders outside the top 50, are a declining share of the new build market and there is a clear North / South divide with sales rates lowest in Southeast, especially for smaller builders, despite this being where housing need is highest.

The research has also showed that 'First Time Buyers' are at recent highs (though still below 1990s levels), but deposit requirements remain a major barrier to home ownership for many, while support for first time buyers has declined. Mortgage lending rules have recently been relaxed, but reducing deposit requirements (via an equity loan) would provide additional support for those with limited savings or without access to the 'Bank of Mum and Dad'. Propensity to rent has remained static for the key First Time Buyer age group since the end of Help to Buy as this group no longer has the support enjoyed by the previous generation.

The conclusion that the research comes to and which the LPDF strongly support is that nearly one in four (c. 375,000) family households currently living in private rented accommodation could be supported to buy a home using an equity loan scheme (assuming they have a 5% deposit) but would struggle to afford the mortgage repayments at 95% LTV. A renewed equity loan scheme could support up to 85,000 additional completions by March 2029 if it was introduced as a matter of urgency by the Government and the resulting boost to housebuilding could create nearly £24 billion in additional GDP over three years to March 2029.

The LPDF therefore strongly urges the Government to introduce an equity loan scheme as a matter of urgency, alongside continuing planning reforms, to stimulate renewed investment into SMEs and see the creation of new entrants. Longer term stability of demand alongside land supply could help to rebuild the SME sector, enabling this part of the industry to make a meaningful contribution to the Government's housebuilding ambitions.

¹⁶ [The case for Demand Support.pdf](#)

81) Do you agree the requirements to take a flexible approach to the consenting framework for large scale residential and mixed-use development is sufficient to ensure the opportunities of large-scale development are supported?

Strongly Disagree.

The imposition of planning conditions requiring developments to be commenced within a shorted timescale would be completely unworkable in reality, and would have numerous negative implications, which would worsen scheme viability and housing delivery rates. The suggestion that this could be implemented shows a fundamental lack of understanding of the complexities that housebuilders, developers and landowners face.

The fundamental point is that housebuilders will always aim to commence development as soon as they possibly can, but there are numerous obstacles they need to overcome before being they can do so. It would be totally counter-intuitive for housebuilders to fund extremely costly and labour-intensive planning applications and to spend money on land, to not then implement their planning consents as quickly as possible, in order to recover their promotion cost expenditure and (hopefully) realise profits from their schemes to recycle into the next site.

Housebuilders will build and sell dwellings as quickly as the market can absorb them, but they also need to ensure they do not “flood the market”.

Housebuilders have some flexibility on sales values but only to a degree as the second-hand market dictates the value, and minimum sales values need to be achieved as part of the housebuilder and finance business models. Pushing developers to build / sell quicker is not a workable solution for numerous reasons.

82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns?

See response to **Question 81** above.

83) Do you agree with the proposed changes to the Housing Delivery Test rule book?

Partially Agree.

The Housing Delivery Test (HDT) is a powerful tool which the Government has to ensure that LPAs are delivering housing in line with their housing requirements. However, in order for this tool to be effective, it relies on the Government’s prompt publication of the HDT results on an annual basis. Therefore, the Government should commit to the publication of the HDT results on a specific date each year to maximise the effectiveness of this tool and to create a consistency of approach.

84) Do you agree that more emphasis should be placed on relevant national strategies and the need for flexibility in planning for economic growth, as drafted in policy E1?

The LPDF strongly agrees that more emphasis should be placed on the relevant national strategies, and also the need for flexibility in planning for economic growth. The first paragraph of the policy aims to streamline the existing NPPF paras 86 and 87, which the LPDF strongly agrees with. However, strategic alignment needs to be supported with a

clear requirement for plans to specifically assess business land and premises needs, and to make ‘sufficient’ land allocations on this basis, to ensure alignment with draft Policies S1 and S2. Our proposed amendments to para 1 parts a and b are made on this basis.

In addition, further clarity is required to enhance the flexibility to respond to the commercial property demand and avoid overly prescriptive requirements in future site allocations, which is the purpose of the newly introduced text in paragraph 2. The LPDF welcomes the introduction of measures at Policy E1 para 2 to ensure allocations are not overly prescriptive regarding the types of uses permitted on particular sites – in the LPDF’s experience, these are often used as a mechanism to exclude B8 uses – but also believes that this should be extended to unit sizes. There is evidence of some local authorities using what the LPDF would regard as arbitrary unit size thresholds (e.g. units less than 9,300 sq.m) to differentiate between local and strategic needs¹⁷. This runs counter to the need for flexibility to respond to market needs.

On this basis, the following amendments are proposed to Policy E1:

- *E1 para 1 part a “Set out a clear economic vision and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth in both urban and rural areas, having regard to the Industrial Strategy³³ and any relevant strategic and local strategies for economic development and regeneration. In doing so they should take into account of:*

~~both local business the identified needs for business land and premises over the plan period, including cross-boundary strategic needs within relevant market areas^{new footnote}, and~~

wider opportunities for economic growth, including priority places for investment in key sectors set out in the Industrial Strategy; and the location of Industrial Strategy Zones³⁴ and AI Growth Zones;”

(New footnote: In accordance with the national planning practice guidance on assessing economic needs)

- *E1 para 1 part b “Take account of a range of market signals on the type and scale of business land and premises requirements, and ~~Seek to~~ address potential barriers to investment, such as inadequate infrastructure, services or housing supply, or a poor environment; and*
- *E1 para 1 part c “Allocate ~~sufficient sites to and~~ implement the economic vision and strategy and meet ~~existing and anticipated the identified~~ needs over the plan period, paying particular regard to facilitating development to meet the needs of a modern economy (including sites and premises which are flexible and adaptable) and the specific locational requirements of different sectors. This includes, where a need exists or is anticipated, making provision for:...”*
- *E1 para 2 “Given changing commercial property requirements, development plans should not be overly prescriptive about the types of uses ~~or unit sizes~~ that would be acceptable on particular sites (other than where there is a clear and*

¹⁷ See, for example, Draft Greater Cambridge Local Plan consultation, [Policy J/NE: New employment development proposals](#).

justified rationale for being specific about acceptable uses or unit sizes at the plan-making stage).”

85) Do you agree with the approach to meeting the need for business land and premises in policy E2?

The LPDF strongly agrees with the principle of Policy E2 to provide clarity on the relevant planning considerations for business development proposals and particularly welcomes the recognition of “*substantial weight*” being given to the economic benefits of commercial development (para 1), and the emphasis on unmet needs and the factors that would establish those (para 2). In respect of the latter, the LPDF welcomes the weight given to market signals and the principles of having regard to the functioning of the commercial property market.

The amendments below aim to additionally give substantial weight where a proposal will meet an evidenced need (part a), and to provide further clarity and primarily consistency across the NPPF:

- *E2 para 1 part a “The economic benefits of proposals for commercial development which allow businesses to invest, expand and adapt; especially where this would **meet an evidenced need**, support the economic vision and strategy for the area, the implementation of the Industrial Strategy³⁵, support **improvements in freight and logistics the development of storage and distribution operations** and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones; ..”*
- *E2 para 2 “Where a development proposal is required to demonstrate whether an unmet need exists (including to demonstrate compliance with policy S5) consideration should be given to **where there is clear evidence as to** whether:*
- *E2 para 2 part a “Market signals indicate an undersupply of specific types of **business** land or premises, taking into account the anticipated catchment area for the type of development proposed, the changing needs of different sectors and the availability of **suitable** existing land and buildings; or”*
- *E2 para 2 part b “A development proposal’s specific locational requirements are **adequately** met by existing allocations in the development plan. ~~This includes, but is not limited to, situations where:~~”*
- *E2 para 2 part b **[amended point i]** “an existing businesses ~~plans~~ to expand or improve their premises; or”*
- *E2 para 2 part b **[new point ii]** “clusters or networks of businesses need to grow (such as clusters of knowledge and data-driven, creative or high technology industries and associated facilities and infrastructure); or”*
- *E2 para 2 part b point ii **[new point iii]** “the availability of infrastructure (such as **access to transport networks**, adequate grid connections or water and*

wastewater capacity) makes certain locations particularly important, including opportunities to co-locate large-scale generators and users of power (such as data centres); or”

- E2 para 2 part b point iii [new point iv] “proposals would meet a **demonstrable** local, regional or national need for the provision of new, expanded or upgraded **storage and distribution** facilities that would result in more efficient, reliable or sustainable handling of goods (whether for their receipt, storage, processing, interchange or distribution).”

86) Do you agree with the proposed new decision-making policy supporting freight and logistics development in policy E3?

The LPDF strongly agrees with the introduction of Policy E3. The following terminology changes are suggested to enhance the consistency across the NPPF. The LPDF proposes some wording qualifications reflecting the particular locational and operational needs that exist for some types of storage and distribution uses:

- Renaming Policy E3: ~~Freight and logistics~~ **Storage and distribution uses**
- E3 para 1 “To support the effective and efficient movement of goods, development proposals for ~~freight and logistics~~ **storage and distribution uses** and associated infrastructure should:..”
- E3 para 1 part b “Be sited and designed to limit environmental impacts **where possible** (such as through the co-location or intensification of facilities to limit vehicle movements, and sensitive building design and landscaping.) The impact on local residents or other neighbouring uses should be acceptable, taking into account **proposed appropriate and proportionate** mitigation, especially where **significant** night-time **activity operations** will be required;

87) Do you agree with the approach to rural business development in policy E4?

The LPDF has no comments on this question.

88) Do you agree with the proposed changes to policy for planning for town centres?

The LPDF has no comments on this question.

89) Do you agree with the approach to development in town centres in policy TC2? a) If not, please explain how you would achieve this aim differently?

The LPDF has no comments on this question.

90) What impacts, if any, have you observed on the operation of planning policy for town centres since the introduction of Use class E?

The LPDF has no comments on this question.

91) Do you believe the sequential test in policy TC3 should be retained?

The LPDF has no comments on this question.

92) Do you agree with the approach to town centre impact assessments in policy TC4?

The LPDF has no comments on this question.

93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband?

The LPDF has no comments on this question.

94) Do you agree the requirements for minimising visual impact and reusing existing structures are practical for applicants and local planning authorities?

The LPDF has no comments on this question.

95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens?

The LPDF has no comments on this question.

96) Do you agree with the approach to planning for energy and water infrastructure in policy W1? a) Please provide your reasons, particularly if you disagree, what alternative approach would you suggest?

Partially Agree.

However, infrastructure providers have been noticeable by their absence from many local plan preparation process which has led to a misalignment of infrastructure investment and delays in the development delivery process as infrastructure providers get involved to late in the development process. The Government needs to include additional wording in Policy W1 to ensure that there is a strong direction placed upon infrastructure providers to get involved in the plan preparation process with sufficient warnings given of the consequences for those providers if they do not engage.

97) Do you agree with the amendments to current Framework policy on planning for renewable and low-carbon energy development and electricity network infrastructure in policy W2?

The LPDF has no comments on this question.

98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3?

The LPDF has no comments on this question.

99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4?

The LPDF has no comments on this question.

100) Do you agree with the proposed prohibition on identifying new coal sites in policy M1, and to the removal of coal from the list of minerals of national and local importance?

Whilst the LPDF do not wish to comment upon 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, we do wish to raise concerns about other elements of Policy M1.

The LPDF considers that the wording used within the proposed Policy M1, which is replicated in Policy N4(2)(a), weakens the impact of the policy at a time when the supply of minerals will be critical, if the Government wants to achieve its ambitions to increase housing and economic growth.

Policy M1 is titled ‘Planning for a Sufficient Supply of Minerals’, wording that is replicated in Policy M1(1). It is considered that this wording should be strengthened to replicate the wording used in the NPPF 2024 and therefore this should read “Planning for a Steady and Adequate Supply of Minerals”.

It is also considered necessary, given the importance of the supply of minerals for the achievement of an increase in growth, for the words contained in paragraph 222 of the NPPF 2024, to be replicated within the new NPPF in Chapter 11. The text in the box at the beginning of Chapter 11 should therefore be amended to read

“It is essential that there is a supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Therefore, the objective of the policies in this chapter is to ensure there is a steady and adequate supply of minerals, while at the same time restricting.....”

101) Do you agree with how policy M1 sets out how the development plan should consider oil and gas?

The LPDF has no comments on this question.

102) Do you agree with the proposed addition of critical and growth minerals to the glossary definition of ‘minerals of national and local importance’?

The LPDF has no comments on this question.

103) Do you agree criteria b of policy M2 strikes the right balance between preventing minerals sterilisation and facilitating non-minerals development?

Partially Disagree.

The phrase "minerals of national and local importance" only appears in Policy M1(1) in the context of making development plans. It does not appear in Policies M2 and M6 which is considered to leave the importance of mineral resources as too generalised. At present, most local plan policies refer to economic, or important, or substantial minerals which ensures that small volumes of poor-quality minerals is not sufficient to meet this requirement.

In Policy M2(1), the words "mineral resources" appears without any qualifier of importance. This should be amended to make clear reference to “minerals of national and local importance”. This paragraph also states that "Where necessary to prevent the

sterilisation of mineral resources, require the prior extraction of minerals on sites allocated for non-mineral development...". This does not reflect the wording used in the NPPF 2024 and may cause unintended consequences preventing development from coming forward. It is also concerning that the wording which is proposed, would mean a LPA could require something as part of a planning permission that itself, needs planning permission. Therefore, this sentence should be amended to read,

*"Where necessary to prevent the sterilisation of mineral resources, **encourage** the prior extraction of minerals on sites allocated for non-mineral development..."* to avoid these consequences.

104) Do you agree policy M3 appropriately reflects the importance of critical and growth minerals?

The LPDF has no comments on this question.

105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3?

The LPDF has no comments on this question.

106) Please provide your reasons, particularly if you disagree.

The LPDF has no comments on this question.

107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply?

The LPDF has no comments on this question.

108) Please provide your reasons, particularly if you disagree.

The LPDF has no comments on this question.

109) Do you agree with approach to coal, oil and gas in policy M5?

The LPDF has no comments on this question.

110) Are there any other exceptional circumstances in which coal extraction should be permitted?

The LPDF has no comments on this question.

111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.

The LPDF has no comments on this question.

112) Do you agree policy M6 strikes the right balance between preventing the sterilisation of minerals reserves and minerals-related activities, and facilitating non-minerals development?

The LPDF has no comments on this question.

113) Does policy M6 provide sufficient clarity on the role of Minerals Consultation Areas?

The LPDF has no comments on this question.

114) Do you agree policy L1 provides clear guidance on how Local Plans should be prepared to promote the efficient use of land?

Partially Agree.

However, it is important for LPAs to also consider the impact of density standards on the overall character of an area, particularly where any proposal involves land on the edge of a settlement. This could be strengthened in Policy L1.

115) If not, what further guidance is needed?

See response to **Question 114** above,

116) Do you agree policy L2 provides clear guidance on how development proposals should be assessed to ensure efficient use of land?

The LPDF has no comments on this question.

117) Do you agree policy L2 identifies appropriate typologies of development to support intensification? a) If not, what typologies should be added or removed and why?

The LPDF has no comments on this question.

118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy?

The LPDF has no comments on this question.

119) Do you agree policy L2 (d)(i) achieves its intent to enable appropriate development that may differ from the existing street scene, particularly in cases such as corner plot redevelopment and upwards extensions.

The LPDF has no comments on this question.

120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages?

The LPDF has no comments on this question.

121) Do you agree policy L3 provides clear guidance on achieving appropriate densities for residential and mixed-use schemes? a) If not, please explain how guidance could be clearer?

Strongly Disagree.

Density is an issue which needs to be considered in context on a site-by-site basis therefore, there needs to be flexibility built into Policy L3 to ensure that proposals which are designed with a density which fits with the character of an area are approved. Therefore, criteria L3(4) should be removed from this policy as it does not provide this flexibility.

122) Do you agree with the minimum density requirements set out within policy L3? (a) Please provide your reasons, particularly if you disagree b) Could these minimum density requirements lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics?

Strongly Disagree.

Whilst it is understandable that the Government wish to maximise the efficient use of land, an objective that the LPDF support, it may be counter-productive to set out specific minimum densities which must be achieved without any consideration of the locational context of individual sites.

Sites located within the urban area may well be able to deliver higher densities, as that will be more in keeping with the surrounding area. However, many sites that are in sustainable locations will be situated on the edge of existing settlements, as this is where the bulk of available undeveloped land is located.

The nature of these locations is that they are transitional zones between the built environment and the countryside. These areas are naturally lower in density and therefore, development at 40dph or 50dph would not necessarily respect the character of the surrounding area. This could therefore cause a conflict between achieving the density criteria of Policy L3 and achieving good design policies which require development to be in keeping with the character of the local area.

Density is therefore an issue which needs to be considered in context on a site-by-site basis and as a consequence, there needs to be flexibility built into Policy L3 to ensure that proposals are designed with a density which fits with the character of an area, whilst maximising the use of land. Therefore, criteria L3(4) should be removed from this policy as it does not provide this flexibility.

123) Do you agree that using dwellings per hectare is an appropriate metric for setting minimum density requirements? Additionally, is our definition of 'net developable area' within the NPPF suitable for this policy?

Partially Disagree

The definition of 'net developable area' which is set out in the Glossary is likely to cause unintended consequences for maximising the use of land and for achieving the density targets, if they remain as part of this Policy.

As the definition includes reference to both the part of the site which can be developed for housing, and associated uses including access roads, private garden space, car parking areas, incidental open space and children's play areas, this causes issues for achieving the higher densities required as part of the policy.

The industry calculates net developable area as that part of the site capable of being developed for housing including the dwelling, ancillary elements such as garages and the private garden space. This calculation specifically excludes access roads and formal and informal open space. If these elements are included, as proposed in the NPPF Glossary, then achieving increasing densities, and the densities set out in Policy L3 (if they remain) may be extremely difficult, unviable or even, undeliverable.

The definition of ‘net developable area’ should therefore be amended to accord with the RICS Professional Standard for ‘Land Measurement for Planning and Development Purposes’¹⁸ which states that,

‘Net development area is the extent of the site area upon which one or more buildings or other operations and their ancillary space can be built, measured on a horizontal plane.’

124) Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well connected’ station? a) Please provide your reasons and preferred alternatives.

Strongly Disagree.

The LPDF supports the positive approach to development outside settlements which is set out in Policy S5. This policy has the ability to significantly increase the delivery of new homes and employment in sustainable locations to meet the Government’s ambitions.

Co-locating development with transport hubs is a sensible strategy where it genuinely enhances access to jobs and services. However, the draft policy currently relies on narrow and outdated proxies for connectivity and, as drafted, risks limiting housing growth and entrenching regional disparities.

The draft policy uses “Well-connected stations” as proxy for a “high level of connectivity to jobs and services”. This is problematic.

Rail does play an important strategic role, particularly in linking large labour markets. However, economic participation depends on overall accessibility, not solely on rail proximity:

- Bus networks are fundamental to labour market access, particularly for lower-income households and service-sector workers.
- Cycling supports access to employment while delivering health and resilience benefits.
- Walking and wheeling are the first choice of sustainable travel, available to all.
- Digital connectivity enables remote working, flexible business models and access to services without travel.

By privileging rail-served locations, the policy risks:

- Undervaluing major bus corridors.
- Excluding employment areas not proximate to rail.

¹⁸ [Land measurement for planning and development ready for approvals.pdf](#)

- Disadvantaging lower-income and key workers.
- Reducing network resilience by concentrating development around a single mode.

A genuinely vision-led policy would assess multi-modal accessibility to employment and services, rather than simply station proximity alone.

The LPDF welcome the absence of a rigid numerical threshold when it comes to the definition of a ‘reasonable walking distance’ which is used as a criterion within Policy S5.

However, the Minister’s oral statement to Parliament on 16 December 2025 referenced a ten-minute or 800-metre distance from a station, and the draft Design and Placemaking Planning Practice Guidance (PPG) states that “people are usually prepared to walk up to 10 minutes (about 800 metres) to a railway station or tram stop” (paragraph 113).

In reality, the distance that people would be willing to walk to a railway station will vary by variables such as:

- Nature and quality of the public transport service;
- Attractiveness of the walk and how safe it feels;
- Gradient of the route;
- Quality of the stop (including provision of shelters and benches); and

Therefore, these 800m references may, in practice, encourage some local authorities to treat this as a rigid maximum rather than a context-sensitive measure. As a result, development located marginally beyond this distance could be unnecessarily constrained, despite the absence of a fixed threshold in the proposed wording.

While it is appropriate to prioritise sustainable locations, an 800-metre benchmark is overly restrictive in many contexts. Evidence shows that 76% of rail users live beyond a ten-minute walk from their nearest station¹⁹ and 70% of residents in England live more than a (longer) fifteen-minute walk from their nearest railway station. In addition, 64% of local authorities already consider distances greater than 800 metres to be acceptable for new development²⁰.

By defining accessibility solely using walking distance, the current wording does not allow for other sustainable transport modes to be considered, for example travelling by bus or cycling. By excluding multi-modal accessibility from the criteria, the proposed policy wording could misrepresent genuine connectivity and unduly constrain appropriate development opportunities by restricting potential land that could be considered.

¹⁹ DFT, 2018, Public attitudes towards train services survey. (para 2.8)

²⁰ p14. www.walkwheelcycletrust.org.uk/media/10520/walkable-neighbourhoods-report.pdf

If cycling were included as an alternative sustainable connectivity measure (to be included as 'active travel'), then five minutes cycling at below average speed would make developments within 1,200m of a train station reasonably accessible.

This wider consideration of connectivity could therefore more than double the land that could be considered leading to a potential 1.4m homes rather than the current 633,000²¹.

If the measure of reasonable distance was widened further, proposed new developments could for example provide a new bus route as a reasonable sustainable travel alternative. If bus connections were considered, a threshold of 3,000m would be a reasonable journey of approximately 10 minutes (at suburban bus speeds of 11mph). This would open a potential 500,000 hectares of eligible land.

The draft policy states that "Well-connected rail stations and underground, tram and light rail stops are those in a top 60 Travel to Work Area (TTWA) located partially or fully within England by Gross Value Added (GVA)".

These metrics reflect historic patterns of economic activity and commuting. TTWAs are derived from 2011 Census travel-to-work data and are therefore rooted in labour market geographies that pre-date significant structural change. They do not reflect the rise in home and hybrid working, which has altered commuting intensity, direction and frequency. If recalculated today, many urban TTWAs may show weaker levels of self-containment because a greater proportion of residents now work remotely, even where their employer remains locally based. Conversely, some rural and smaller towns may exhibit relatively stronger self-containment than in 2011. Therefore, basing future housing distribution on 2011 TTWAs risks misaligning development locations with contemporary and emerging economic patterns.

Using the top 60 TTWAs ranked by GVA further concentrates development in already successful areas, limiting opportunities in smaller or emerging labour markets and potentially reinforcing regional disparities. This threshold is arbitrary and the policy is sensitive to this cut-off point.

In research undertaken by Lichfields entitled 'All Aboard or Stuck Between Stations'²² they conclude that up to 854,000 additional new homes could be delivered, if the definition was widened around the frequency of service and the Travel to Work Area (TTWA) criteria.

The Lichfield's research also cites several examples of locations which would be excluded by the current top 60 TTWA criterion including Cheltenham and Newbury, and the LPDF would also highlight areas such as Bath, Bedford (where consent has recently been granted for Europe's largest theme park), Doncaster, Worcester, Colchester which are similarly excluded. The approach which uses the top 60 TTWA is therefore flawed, severely limits the effectiveness of the policy and creates anomalies with other elements of the Government's growth agenda such as the focus on New Towns.

Whilst we therefore disagree that the use of TTWAs is an appropriate metric for the policy test, if it is retained, the LPDF consider that the threshold should be uplifted to the top

²² [All aboard or stuck between stations? How the new NPPF might unlock growth around rail stations](#)

100 TTWAs ranked by GVA and the test should be reworded to account for stations with services into a top 100 TTWA (within a reasonable journey time), rather than only stations within a top 60 TTWA. This would widen the impact of the policy, would ensure it better aligns with other Government initiatives such as the Ox-Cam Corridor and New Towns, and would increase the regional parity impact of the policy with more stations outside those in the Southeast of the country being brought within the definition.

The draft policy also includes reference to stations which, in the normal weekday timetable, are served (or have a reasonable prospect of being served) throughout the daytime by four trains or trams per hour overall, or two trains per hour in any one direction.

The use of this frequency threshold in the policy is too simplistic. It does not account for stations that have a low frequency because demand is currently low, because of a low surrounding population for example.

The stated metrics also fail to account for off-peak frequency – shift work, off-peak employment, care work and irregular hours are often poorly served by rail, even where frequency is high at peaks.

If the threshold for eligibility was widened to stations that had two departures each way during peak hours (6:30–9:30 a.m. and 4–7 p.m.) and in the top 100 TTWAs by productivity, this could be as much as 80,000 hectares of non-built up, unconstrained land leading to a capacity of up to 2.4 million potential homes.

Suggested Wording Changes to Policy S5(1)(h)

*“h. Development for housing and mixed-use development which would be: **located where it can support sustainable patterns of movement and make effective use of existing or proposed transport infrastructure, reflecting the principles in Policy TR3. A range of qualitative and quantitative evidence should be used to inform the assessment and selection of sites for development and appropriate densities;**”*

These changes would need to be reflected in Policy GB7(1)(h)(i) which should be amended to read:

*“(i) **be located where it can support sustainable patterns of movement and make effective use of existing or proposed transport infrastructure, reflecting the principles in Policy TR3;**”*

Footnote 26 should also be amended to reflect the widened criteria as discussed above and should read:

*“Well-connected rail stations and underground, tram and light rail stops are those in a top ~~60~~ **100** Travel to Work Area located partially or fully within England by Gross Value Added (GVA) and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains or trams per hour ~~overall~~, or two trains or trams per hour in any one direction **during the peak period and at least two trains or trams per hour, or one train or tram per hour in any one direction, during the off-peak period.**”*

The impact of these minor amendments to the criteria used for eligibility under Policy S5 could be significant and could assist the Government greatly in achieving significant

levels of housing and economic growth in a sustainable manner. The LPDF asked Lichfields to assess the potential impacts of the variations in the criteria on the amount of land that could be available if the definitions were widened. The output from this work can be found in Appendix 2 of this representation.

**125) Are there other types of location (such as urban core, or other types of public transport node) where minimum density standards should be set nationally? Yes/No
a) If so, how should these locations be defined in a clear and unambiguous way and what should these density standards be?**

No.

126) Should we define a specific range of residential densities for land around stations classified as 'well-connected'?

No.

See response to **Questions 121 to 124** above.

127) If so, what should that range be, and which locations should it apply to?

See response to **Questions 121 to 124** above.

128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions?

The LPDF have no comments to make on this question.

129) Please provide your reasons, particularly if you disagree.

The LPDF have no comments to make on this question.

130) Do you agree that policy GB1 provides appropriate criteria for establishing new Green Belts?

Strongly Agree.

131) Please provide your reasons, particularly if you disagree.

The LPDF has no comments on this question.

132) Do you agree policy GB2 gives sufficient detail on the expected roles spatial development strategies and local plans play in assessing Green belt land?

Strongly Agree.

133) Do you agree with proposals to better enable development opportunities around suitable stations to be brought forward?

Please see our response to **Question 38** above.

134) Do you agree the expectations set out in policy GB5 are appropriate and deliverable in Local Plans?

Partially Agree.

However, it is important to remember that Green Belt is a policy designation which is not based upon environmental criteria and therefore, some of the benefits set out in Policy GB5 may be difficult to deliver.

135) Please provide your reasons, particularly if you disagree.

See response to **Question 134** above.

136) Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land?

Partially Agree.

However, we disagree with the elements set out in Policy GB7(h) for the reasons set out in response to **Question 38**.

Policy GB7(1)(h)(i) should therefore be amended to read:

“(i) be located where it can support sustainable patterns of movement and make effective use of existing or proposed transport infrastructure, reflecting the principles in Policy TR3;”

137) Do you agree policy GB7(1h) successfully targets appropriate development types and locations in the Green Belt, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12?

Partially Disagree.

We disagree with the elements set out in Policy GB7(h) for the reasons set out in response to **Question 38**.

138) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers.

The LPDF has no comments on this question.

139) Do you agree that site-specific viability assessment should be permitted on development proposals subject to the Golden Rules in these three circumstances?

Strongly Agree.

Viability assessments should be allowable on development proposals that are subject to the Golden Rules.

A number of Golden Rule development sites could be rendered financially non-viable by the Policy GB8 (A-C) requirements, particularly smaller-scale development sites in lower value areas, where a 50% affordable requirement would result in insufficient land returns. Sites of this nature would not fall within categories Policy GB8 (A-C), so would not be developed, and these sites would not therefore contribute towards the Government’s ambitious housing delivery targets.

140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only for genuinely previously developed land, and not predominantly greenfield sites?

No.

Current policy and guidance do not need to be changed.

141) Do you agree with setting an affordable housing 'floor' for schemes subject to the Golden Rules accompanied by a viability assessment subject to the terms set out?

Strongly Disagree.

We do not agree with the setting of an affordable housing 'floor'. Any minimum affordable housing requirement would risk sterilising development sites for viability reasons, which would be at odds with the Government's extremely ambitious housing delivery targets.

142) Please explain your answer, including your view on the appropriate approach to setting a 'floor', and the right level for this?

See response to **Question 141** above.

143) Do you agree with local planning authorities testing viability at the plan making stage using a standardised Benchmark Land Values scenario of 10 times Existing Use Value for greenfield, Green Belt land?

Strongly Disagree.

Setting a minimum multiplier at 10 times would not provide a sufficient incentive to landowners to bring their land forward in many parts of the country for a variety of considerations such as loss of income from the land, capital gains tax, stamp duty land tax, agricultural property relief etc. In many areas a 10x EUV imposition could lead to a land strike, with the impacts greatest on the smaller sites critical to support SMEs.

144) Do you have any other comments on the use of nationally standardised Benchmark Land Values for local planning authorities to test viability at the plan-making stage?

LPAs must retain the flexibility to set locally specific Benchmark Land Values (BLVs) for plan making purposes, cognisant of local housing market and land market conditions, tested through their Local Plan Viability Assessments.

145) Do you agree that proposed changes to the grey belt definition will improve the operability of the grey belt definition, without undermining the general protections given to other footnote 7 areas?

Strongly Agree.

146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes?

Strongly Agree.

147) Do you agree with the approach to design tools set out in policy DP2?

Strongly Agree.

The LPDF is particularly supportive of the recognition in Policy DP2 that design guides, codes and Masterplans need to be informed by an understanding of the economic, social and environmental context for implementation, and that there needs to be a monitoring and review mechanism so that adjustments can be made in light of implementation.

148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places?

Strongly Agree.

149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? a) If not, what else would help secure better design and placemaking outcomes?

Strongly Agree.

150) Do you agree that policy TR1 will provide an effective basis for taking a vision-led approach and supporting sustainable transport through plan making?

Partially Agree.

The LPDF considers that Policy TR1 provides an effective and robust basis for embedding a vision-led approach to transport within plan-making and for supporting sustainable transport outcomes.

The policy appropriately requires sustainable transport to be considered from the earliest stages of plan preparation, ensuring that transport is integral to the spatial strategy rather than a matter addressed reactively at the development management stage.

The LPDF also supports the emphasis on early and meaningful engagement with local communities, transport authorities, infrastructure providers, operators, and neighbouring authorities. This will improve the quality of evidence informing plans, reduce the risk of late-stage conflict, and provide a clearer and more defensible policy basis for site allocation and infrastructure planning.

However, the LPDF strongly disagree with reference being made to the Connectivity Tool in Policy TR1(1)(b), this is still in beta testing mode and has not been fully tested or scrutinised as a robust evidence base. Whilst it could be used as a suite of other qualitative and quantitative data sources in determining whether a site is suitably located, specific mention in the NPPF is unnecessary and may cause unintended consequences.

The Connectivity Tool does not easily differentiate between urban and rural connectivity and does not fully reflect that a well-connected rural location is likely to not score as well as a well-connected urban location, but it is still considered to be a well-connected site. If the Connectivity Tool output is not able to recognise this differentiation and the result is taken out of context by the decision maker, it could mean that sustainable, well-connected, rural sites will not come forward as they do not pass the Connectivity Tool threshold.

Therefore, as the tool is still in beta testing, and that it does not recognise the definition between urban and rural location, it is not appropriate to refer to it in Policy TE1 of the NPPF. If reference is made to the use of the tool, as one of a number of considerations as to whether a site is well located, then this should be done in the Planning Practice Guidance (PPG).

151) Do you agree that policy TR2 strikes an appropriate balance between supporting maximum parking standards where they can deliver planning benefits, and requiring a degree of flexibility and consideration of business requirements in setting those standards?

The LPDF has no comments on this question.

152) Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool?

Strongly Disagree.

The LPDF considers that reference to the Connectivity Tool in Policy TR3(2) is inappropriate for the reasons set out in our response to **Question 150** above. Therefore, Policy TR3(2) should be deleted.

153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places?

The LPDF has no comments on this question.

154) Do you agree with policy TR5 as a basis for supporting the provision and retention of roadside facilities where there is an identified need?

The LPDF has no comments on this question.

155) Do you agree that the amended wording proposed in policy TR6 provides a clearer basis for considering when transport assessments and travel plans will be required, and for considering impacts on the transport network?

Partially Disagree.

Policy TR6 as proposed, is less clear in its Policy intent than the previous wording that was included in paragraph 116 of the NPPF 2024. Criterion (3) is proposed to state that

“All development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety, taking into account any mitigation measures proposed as well as any wider network improvements.”

As a development management policy, the previous wording is much clearer for decision makers and therefore, in order for this Policy to operate effectively, the LPDF consider that the wording of Policy TR6(3) should be returned to the wording as set out in the NPPF 2024:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the

road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

156) Do you agree the proposed text in policy TR7 provide an effective basis for assessing proposals for marine ports, airports and general aviation facilities?

The LPDF has no comments on this question.

157) Do you agree with the additional policy on maintaining and improving rights of way proposed in policy TR8?

The LPDF has no comments on this question.

158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards?

Partially Agree.

However, in the context of criteria HC1(a), it is important to direct service providers to engage with the plan making process and to be aware of the implications for not engaging at the appropriate time. It must also be emphasised that not all new development is populated by people who are entirely new to the area. Many people move relative short distances to new developments, and an allowance should be made for the fact that many of these people will already be using the services and facilities in the location of the new development. This should be accounted for in the calculation of the need for new services or improved services as a result of development.

159) Do you agree that Local Green Space should be ‘close’ to the community it serves?

Partially Agree.

However, the designation of Local Green Space (LGS) is often used by Neighbourhood Plans (NP) as a way to frustrate and stop proposals coming forward.

Often, because of the limited nature of a NP examination process, the evidence base and justification for the designation of LGS is not robust. Policy HC2 should be worded in a stronger way to ensure that any NP designation for LGS is robustly justified.

160) Do you agree that the proposed policies at HC3 and HC4 will support the provision of community facilities and public service infrastructure serving new development?

See response to **Question 158** above.

161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term ‘fast food outlets’, and the types of uses to which it applies?

The LPDF has no comments on this question.

162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6?

The LPDF has no comments on this question.

163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of 'and/or' with reference to quantity and quality of replacement provision?

The LPDF has no comments on this question.

164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply?

Strongly Agree.

LGS should not fall into the category of grey belt.

165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans?

The LPDF has no comments on this question.

166) Are any additional tools or guidance needed to enable better decision making on contaminated land?

The LPDF has no comments on this question.

167) Do you agree with the criteria set out in proposed policy P3 as a basis for securing acceptable living conditions and managing pollution?

The LPDF has no comments on this question.

168) Do you agree policy P4 makes sufficiently clear how decision-makers should apply the agent of change principle?

The LPDF has no comments on this question.

169) Do you agree policy P5 provides sufficient basis for addressing possible malicious threats and other hazards when considering development proposals?

The LPDF has no comments on this question.

170) Do you agree that substantial weight should be given to the benefits of development for defence and public protection purposes?

The LPDF has no comments on this question.

171) Do you agree with the proposed changes set out in policy F3 to improve how Coastal Change Management Areas are identified and taken into account in development plans?

The LPDF has no comments on this question.

172) Do you agree with the proposed clarifications to the sequential test set out in policy F5?

Partially Disagree.

The revision identifies the catchment for the sequential test, which is particularly helpful, as many LPAs have previously insisted on a borough wide search which was unrealistic.

Where the policy states ‘areas known to be at risk now or in the future from any form of flooding’ this needs to be clarified to which level of climate change is required and what lifetime time period it is referring to in order to remove ambiguity.

With regards to access being at risk of flooding, this needs clarification in relation to bridging the floodplain being acceptable, again many LPAs view something crossing a floodplain to be ‘located’ in an area that would be at risk of flooding, whereas the bridge crosses the flooding with no risk.

With regard to the SFRA providing the evidential basis for applying the sequential test, a site-specific flood risk assessment should be used ahead of the SFRA for the site-specific nature, thereby having more detail on the sources of flooding or possibly site-specific modelling data. The SFRA is suitable for comparison across other sites where that would be the best available data.

173) Do you agree with the proposed approach to the exception test set out in policy F6?

Strongly Agree.

174) Do you agree with the proposed requirement in policy F8 for sustainable drainage systems to be designed in accordance with the National Standards?

Partially Agree.

The reference to ‘have maintenance arrangements in place’ is correct but this needs to be at the point of occupation, as when submitting outline applications, this is not feasible to have in place. Recently LPAs have been pushing for maintenance detail at outline stage which isn’t appropriate.

175) Do you agree with the proposed new policy to avoid the enclosure of watercourses, and encourage the de-culverting and re-naturalisation of river channels?

Partly Disagree.

With regard to removing culverts, this should also include the phrase ‘where practical’ as on certain sites it is not economically feasible to remove culverts due to the engineering works required.

176) Do you agree with the proposed changes to policy for managing development in areas affected by coastal change?

The LPDF has no comments on this question.

177) The National Coastal Erosion Risk Map sets out where areas may be vulnerable to coastal change based on different scenarios. Do you have views on how these scenarios should be applied to ensure a proportionate approach in applying this policy?

The LPDF has no comments on this question.

178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications?

Strongly Agree.

179) Do you agree that the proposed approach to planning for the natural environment in policy N1, including the proposed approach to biodiversity net gain, strikes the right balance between consistency, viability, deliverability, and supporting nature recovery?

Neither Agree nor Disagree.

180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

It is not considered that there are any circumstances where it is reasonable to seek more than 10% biodiversity net gain on sites. The 10% national mandatory requirement was only introduced in February 2024 and is therefore yet to become established. It is therefore considered that we should use the 10% requirement to learn lessons in its implementation before considering whether an increase is justified and deliverable.

181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development?

Partially Agree.

Policy N2 is supported but there are elements which need clarification.

Policy N2(1)(b) is supported but poorer quality agricultural land should not be prioritised if it is not in a sustainable location. There may be instances where sites are sustainable located, and appropriate for development, but have higher quality agricultural land. In these instances, a balanced decision must be made.

Policy N2(1)(f) must include a limited list of specific species as the current definition in this clause is too wide.

182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? a) Please provide your reasons, including how policy can be improved to ensure compliance.

Partially Disagree.

Footnote 70 to Policy N4 and N5 should be amended to indicate that small and medium sized sites are unlikely (it is still a matter for the decision maker but there is an indication that national policy views the delivery of these sites as important) to be viewed as ‘major development’

183) Do you agree policy N6 provides clarity on the treatment of internationally, nationally and locally recognised site within the planning system?

The LPDF has concerns regarding Policy N6(2), which relates to the loss or deterioration of irreplaceable habitats, including veteran trees. In particular, the LPDF notes that the draft NPPF proposes to amend the definition of “ancient or veteran trees”.

The proposed amendment replaces the word “and” with “or” in relation to the criteria of age, size and condition. This change would significantly broaden the scope of the definition, and it has been estimated that between three and four times more trees could be captured by the revised definition.

Policy N6(2) states that development resulting in the loss or deterioration of irreplaceable habitats, including veteran trees, should be refused unless there are “wholly exceptional reasons”. This represents a very high policy threshold and, in practice, may provide a stronger level of protection than that afforded to other nationally important environmental designations, such as SSSI.

The LPDF is concerned that the combined effect of broadening the definition of veteran trees while retaining this very high policy test could place significant additional constraints on the delivery of development. In particular, this may create additional barriers to housing delivery and economic development, which risks running counter to the Government’s stated objectives of boosting housing supply and supporting economic growth.

A further practical consequence is that the revised definition could affect the deliverability of allocated sites. For example, where a newly defined veteran tree requires the application of a buffer zone, this could prevent the provision of necessary infrastructure such as the only viable access point to a site. In such circumstances, an otherwise suitable and allocated development site may become undeliverable in practice.

The LPDF therefore recommends that the implications of the proposed definitional change are carefully considered, particularly in terms of its potential impact on housing delivery.

184) Are there any further issues for planning policy that we need to consider as we take forward the implementation of Environmental Delivery Plans?

The LPDF is engaging with Natural England and Defra over the implementation of Environmental Delivery Plans and will feed comments into these organisations through this engagement.

185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act?

The LPDF has no comments on this question.

186) Do you have any evidence as to the impact of implementing the additional regard duties for development?

The LPDF has no comments on this question.

187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3?

The LPDF has no comments on this question.

188) Do you agree with the approach to assessing the effects of development on heritage assets set out in policy H5?

The LPDF has no comments on this question.

189) Do you agree with the approach to considering impacts on designated heritage assets in policy HE6, including the change from "great weight" to "substantial weight", and in particular the interactions between this and the statutory duties?

The LPDF has no comments on this question.

190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10?

The LPDF has no comments on this question.

191) Do you have any other comments on the revisions to the heritage chapter?

The LPDF has no comments on this question.

192) Do you agree with the transitional arrangements approach to decision making?

Partially Agree.

The LPDF strongly supports the proposal that the policies of the NPPF will be a material consideration from the date of publication. The Government has set ambitious targets for housebuilding in this Parliament, and time is becoming limited for the Government to achieve this aim. Therefore, no time can be wasted in implementing the many positive elements of this NPPF that will help the Government to achieve its ambitions.

However, we do not agree with Paragraph 3 of Annex A (of the Draft NPPF). This provides too much protection for LPAs. To reduce the gap between adopted Plan figures and the new Standard Method, reference should be made to this only applying where the housing

requirement in the Local Plan is at least 80% of the local housing need figure calculated using the standard method.

Paragraph 3 is particularly ineffective without the publication of the 2024/2025 Housing Delivery Test results. We understand that government intends to combine the data collection for the 2024 and 2025 housing delivery test to help re-establish a regular publication cycle. Results will apparently be published later this year. This is of significant concern. Delaying the publication (of the 2024 measurement) is only harming the delivery of housing.

In relation to the plan-making transitional arrangements, it seems non-sensical for LPAs to continue with Local Plans which include development management policies when those policies are likely to have 'very little weight' once the NPPF is published. We therefore recommend that LPAs currently preparing a Local Plan are required to submit a Statement of Compliance with this NPPF and to remove policies in advance of consultation or examination that do not fully comply with the NPPF.

193) Do you have any further thoughts on the policies outlined in this consultation?

No.

194) Do you agree with the list of Written Ministerial Statements set out in Annex A to the draft Framework whose planning content would be superseded by the policies proposed in this consultation?

Strongly Agree.

It should be clearly stated which Written Ministerial Statements will be superseded when the new NPPF is adopted, so that it is very clear which policies apply.

195) Do you consider the planning regime, including reforms being delivered through the Planning and Infrastructure Act, provide sufficient flexibility for energy generation projects co-located with data centres to be consented under either the NSIP or TCPA regime?

The LPDF has no comments on this question.

196) Would raising the Planning Act 2008 energy generation thresholds for renewable projects that are co-located with data centres in England (for the reason outlined above) be beneficial? Yes/No a) If so, what do you believe would be the appropriate threshold? Please provide your reasons.

The LPDF has no comments on this question.

197) Do you have any views on how we should define 'co-located energy infrastructure'?

The LPDF has no comments on this question.

198) Do you think the renewable energy generation thresholds under Section 15 of the Planning Act 2008 for other use types of projects should be increased, or should this be limited to projects co-located with data centres?

The LPDF has no comments on this question.

199) What benefits or risks do you foresee from making this change?

The LPDF has no comments on this question.

200) Would you support the use of growth testing for strategic, multi-phase schemes?

No.

The current approach to the setting of site-specific affordable housing requirements for larger scale strategic schemes, through the local plan process, should be maintained. These requirements are tested through the Local Plan Viability Assessment which take account of all policy requirements, and which are tested through the local plan examination process.

It is worth noting that a fundamental Red Book valuation principal is that all revenues and costs should be applied based upon current day revenue/ current day costs. Any amendments to this approach would result in significant issues which would render many developments non-viable / non-deliverable.

201) Would you support the optional use of growth testing for regeneration schemes?

The same comments as provided to **Question 200** apply equally to regeneration schemes. Any changes to the current approach are only likely to threaten the delivery of schemes due to increased difficulties in securing funding.

202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty? a) Please explain your answer. If you agree, the government welcomes views on the appropriate figure – for example, whether 17.5% would be an appropriate reflection of the industry standard for most market-led development.

Strongly Disagree.

Developer margins vary dependent upon site specific considerations such as the planning process, funding, current local market conditions and timescale risks. Introducing a single figure would not reflect land market behaviours or RICS guidance and would impact negatively on future land supply.

203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply? a) Please explain your answer. The government is particularly interested in views on whether clarifying an appropriate profit of 6% on Gross Development Value for affordable housing tenures would make viability assessments more transparent and speed up decision-making.

There is no justification, given current market conditions (see Savills research)²³, for reducing developer margins. If such a provision was introduced, it would make it much harder for developers to secure development finance to fund schemes. The effect would

²³ [The case for Demand Support.pdf](#)

be to reduce land supply given the inevitable downward impact on RLVs. At the current time the Government need more, not fewer, landowners willing to sell their land for residential development.

204) Are there further ways the government can bring greater specificity and certainty over profit expectations across landowners, site promoters and developers such that the system provides for the level of profit necessary for development to proceed, reducing the need for subjective expectations?

It is not the role of planning policy to prescribe profit expectations for developers. A healthy and vibrant residential development sector requires a combination of entrepreneurial risk-based investment and a clear definition of what is necessary in terms of planning obligations, to enable a scheme to secure planning permission. Prescribing and lowering developer profits will accelerate the current outflow of investment from the residential development sector.

205) Existing Viability Planning Practice Guidance refers to developer return in terms a percentage of gross development value. In what ways might the continued use of gross development value be usefully standardised?

The current system should not be changed as it is working efficiently. Any additional complexity created by a requirement to apply new valuation methods to the viability process would cause additional delays and costs in the development process, especially given the lack of development viability skills and capacity within LPAs.

206) Do you agree that there are 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 Disagree.

The current system should not be changed as it is working efficiently. Any additional complexity created by a requirement to apply new valuation methods to the viability process would cause additional delays and costs in the development process, especially given the lack of development viability skills and capacity within LPAs.

The Government should focus on ensuring that the money collected through the S106 process is actually spent by LPAs and other stakeholders as required by the planning permissions that are granted.

207) Are there types of development on which metrics other than profit on gross development value should be routinely accepted as a measure of return e.g. strategic sites large multi-phased schemes, or build to rent schemes?

See response to **Question 206** above.

208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances? a) In what circumstances might a premium, or the usual premium, not be required? b) What impact (if any) would you foresee if this change were made?

Strongly Disagree.

The key issue is that development cannot proceed if a landowner does not receive a minimum acceptable return as they will simply not sell the land. It is difficult to envisage a situation where a landowner will not seek to achieve optimum price, as set by the planning permission

209) Do you agree that extant consents should not be assumed to be sufficient proof of alternative use value, unless other provisions relating to set out in plans are met?

Strongly Disagree.

Case law, policy and guidance recognises that a deliverable extant consent helps define the value of a site. It is not realistic for the planning policy to be formulated on the basis of a different assumption.

210) If extant consents were not to be assumed as sufficient proof of alternative use value, should this be at the discretion of the decision-maker, or should another metric (e.g. period of time since consent granted) be used? a) If another metric, please set out your preferred approach and rationale.

See response to **Question 209** above.

211) What further steps should the government take to ensure non-policy compliant schemes are not used to inform the determination of benchmark land values in the viability assessments that underpin plan-making?

See response to **Question 209** above.

212) Do you agree that the residual land value of the development proposal should be cross-checked with the residual land values of comparable schemes; to help set the viability assessment in context.

Strongly Disagree.

Since 2019, the approach to viability has moved from a market value approach to a Benchmark Land Value approach. It would not be appropriate to introduce a new requirement to consider transacted land values of comparable schemes for a number of reasons:

- The additional complexity and delays associated with testing comparable schemes.
- The difficulties in finding genuinely comparable schemes.
- The resultant need to allow developers to consider comparables when setting the BLV, rather than relying upon Existing Use Value (EUV+) or Alternative Use Value (AUV+) as per the current guidance.

If comparables were to be introduced at the end of the viability process, it would present significant amounts of subjectivity and additional work into the viability process. This would inevitably lead to planning applications taking longer to get through the process, significantly reducing new homes delivery.

213) Do you agree that a 2.5 hectares threshold is appropriate?

Partially Disagree.

The LPDF supports the Government's proposal to define a medium size of development scheme. However, we do not see why there is a need to put a site size threshold on this definition when the number of units is sufficient.

There are situations, because of site constraints such as topography, BNG delivery, SuDS, public open space, green infrastructure provision etc. where the delivery of between 10 and 49 units may occupy a site of in excess of 2.5 hectares. Given that the Government want to encourage new home delivery by SME developers, and that they wish to leave no stone unturned when it comes to encouraging housing growth, it seems unnecessary to place a restriction on site size when unit number is a sufficient threshold. Therefore, the LPDF suggest that the definition of medium site is limited to unit numbers (please see our response to **Question 214** below on unit numbers).

214) Do you agree that a unit threshold of between 10 and 49 units is appropriate?

Partially Agree.

The LPDF strongly support the definition of medium sized sites in the NPPF. However, we do not think that the threshold should be 10-49 units, as to have the greatest impact, we believe the upper limit needs increasing.

In order to maximise the benefits gained by SMEs from this definition, and to increase their ability to access land and deliver housing, we strongly believe the government need to go further and that this threshold should be increased to up to 79 dwellings. This would then capture a greater number of sites, giving more SME builders opportunities within the market and in turn increasing the delivery of housing.

The LPDF refer to recent research prepared by Savills²⁴ which highlights, through Table 2, how recent policy has neglected the importance of small sites. This demonstrates how the share of homes being consented on sites of less than 100 homes has consistently declined since 2017, reaching a low of 51,000 in 2023. The proposals to create a 'medium sites' category may help to reverse these trends, however increasing the upper end of the threshold would seem appropriate if delivery is to substantially increase over a short time period.

The LPDF note that whilst the Radix Big Tent commission report points towards 100 as the upper threshold, we believe that 79 is a more appropriate upper limit, as if this were increased beyond 80 dwellings, we believe that some of the larger housebuilders and PLCs would have an interest in these sites and then there would be the potential for these larger builders to be competing with the SME's for these sites. It is important to remember that the purpose of creating this new size threshold is to maximise the ability

²⁴ [The case for Demand Support.pdf](#)

for SME housebuilders to be active in the housing market and therefore it is critical to ensure that the vast majority of medium sized sites are accessed by SME builders and that this sector of the market is able to develop and grow as a result of these proposals. We do not want to create a situation where SME housebuilders are regularly having to compete with the PLCs for sites.

Whilst having the threshold upper limit set at 50 as proposed in the working paper, would provide increased opportunities for SME builders, we believe that to capitalise on these changes the optimum threshold for medium sites is 10-79. This definition of 'medium sized development' should apply to full and outline applications as well as to Permissions in Principle as this will support SME developers by de-risking the planning process whilst keeping the cost of applications to establish the principle of development, at a reasonable level.

215) Do you foresee risks or operability issues anticipated with the proposed definition of medium development?

No.

216) If so, please explain your answer and provide views on potential mitigations.

The LPDF has no comments on this question.

217) Do you have any views on whether the current small development exemption should be extended to cover a wider range of sites – indicatively to sites of fewer than 50 dwellings, or fewer than 120 bedspaces in purpose-built student accommodation?

Extending the current small development exemption to cover a wider range of sites may help small developers deliver BNG off-site more easily. However, SME developers, who deliver small and medium-sized sites should continue to be required to contribute proportionally to BNG through a nature recovery fund mechanism, rather than having to provide on-site or off-site BNG. This would make the process less complex, less costly, and would cause fewer delays for SMEs who have less financial flexibility to engage with the current BNG procedures.

218) If the exemption were to be extended, do you have any views on whether the development of 120 purpose-built student accommodation bedspaces is an appropriate equivalent to a development of 50 dwellings for the purposes of the levy exemption?

The LPDF has no comments on this question.

219) If the exemption were to be extended, do you have any views on whether the exemption should be based solely on the existing metrics (dwellings/bedspaces) or whether there should also be an area threshold.

The LPDF consider that the dwelling / bedspace metric is all that is required.

220) If you do have views on possible changes to the small developments levy exemption, please specify the potential impact of the possible change of the levy exemption on people with protected characteristics as defined in section 149 of the Equality Act 2010.

The LPDF has no comments on this question.

221) What do you consider to be the potential economic, competitive, and behavioural impacts of possible changes to the levy exemption? Please provide any evidence or examples to support your response.

See our response to **Question 217** above.

222) Do you agree with the proposal to extend the Permission in Principle application route to medium development?

Strongly Agree.

223) Do you have views about whether there should be changes to the regulatory procedures for these applications, including whether there should be a requirement for a short planning statement?

The LPDF would not object to the need for a short planning statement to be submitted with any Permission in Principle application for a medium sized site. However, the Government must ensure that LPAs are properly skilled and resourced to process such applications and to ensure that these applications are dealt with efficiently and as robustly as planning applications.

224) Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? a) If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

The LPDF has no comments on this question.

225) Is there anything that could be done to mitigate any impact identified?

The LPDF has no comments on this question.

Appendix 1

Supporting changes to the Planning Practice Guidance

LPDF

March 2026

Appendix 1 - Supporting changes to the Planning Practice Guidance

The LPDF believes that the effectiveness of changes to the NPPF will need to be supported by consequent changes to the national Planning Practice Guidance (PPG), specifically in relation to planning for [economic needs](#). This section has not been updated since 2019, and accordingly the LPDF believes such changes are long overdue.

Accordingly, the LPDF has set out below comments and proposed changes to this section of the PPG. These are incremental amendments that work ‘with the grain’ of the existing PPG section, but it is considered that a comprehensive recasting of this section is likely to be necessitated and the LPDF would welcome the opportunity to engage with government on this matter.

It should be noted that, at the present time, the LPDF is not advocating for the adoption of a singular ‘standard method’ formula to determine business land and premises needs – particularly in relation to storage and distribution uses – reflecting the diversity of market segments and geographies that exist across England.

<p>How can authorities determine the type of employment land that is needed? [Paragraph: 025 Reference ID: 2a-025-20190220]</p>	<p>General updating to refer to the role of Spatial Development Strategies to assist with the identification of functional economic market areas, and the role SDS in defining locations where strategic scale developments such be located. Delete reference to Local Enterprise Partnerships.</p> <p>Amend wording as follows: <i>“Strategic policy-making authorities will need to prepare a robust evidence base to understand existing and future business needs, which will need to be kept under review to reflect local circumstances and market conditions. National economic trends may not automatically translate to particular areas with a distinct employment base or particular market requirements, and authorities should consider latest available evidence on market signals including availability, net absorption and market rents.”</i></p>
<p>How can strategic policy making authorities prepare and maintain evidence about business needs? [Paragraph: 026 Reference ID: 2a-026-20190220]</p>	<p>General updating to reference the need to take account of the Industrial Strategy and other relevant documents such as Local Growth Plans.</p>
<p>How can market signals be used to forecast future need? [Paragraph: 027 Reference ID: 2a-027-20190220]</p>	<p>Add reference to:</p> <ul style="list-style-type: none"> <i>“use of available market data, for example, trends on the net absorption rate of commercial premises and availability levels”.</i> <p>Add amendment as follows:</p> <ul style="list-style-type: none"> <i>“analysis based on the past take-up of employment land and property where this has not been unduly constrained, the extent of latent demand as evidenced by long-term availability levels below market averages, and/or future property market requirements.”</i>

<p>How can strategic policy making authorities identify the existing stock of employment land and identify the recent pattern of supply and loss? [Paragraph: 028 Reference ID: 2a-028-20190220]</p>	<p>This should include specific consideration of business sites and premises which play a wider market role in terms of key transport routes and networks, and therefore have a cross-boundary role.</p>
<p>How can current market demand be analysed? [Paragraph: 029 Reference ID: 2a-02920190220]</p>	<p>Amend as follows:</p> <ul style="list-style-type: none"> • <i>“It is important to consider a range of approaches to include: recent employment land take-up, projections (based on past trends) and forecasts (based on future scenarios), and market signals analysis, and to identify instances where sites have been developed or sought for specialist economic uses not anticipated through these approaches.”</i>
<p>How can employment land requirements be derived? [Paragraph: 030 Reference ID: 2a-030-20190220]</p>	<p>Amend as follows:</p> <ul style="list-style-type: none"> • <i>“employment to floorspace (employment density) based on latest evidence and</i> • <i>floorspace to site area (plot ratios based on industry proxies), taking account of the needs of different market segments and forms of development, including larger-scale unit sizes.”</i>
<p>How can authorities assess need and allocate space for logistics? [Paragraph: 031 Reference ID: 2a-031-20190722]</p>	<p>For consistency, this section should be re-titled ‘...for storage and distribution uses’. Reference to Local Enterprise Partnerships should be updated.</p> <p>Amend as follows:</p> <ul style="list-style-type: none"> • <i>“analysis of market signals, including trends in take up, the extent of latent demand, and the availability of logistics land and floorspace across the relevant market geographies;”</i>
<p>How can the specific locational requirements of specialist or new sectors be addressed? [Paragraph: 032 Reference ID: 2a-032-20190722]</p>	<p>General updating to replace reference to Local Industrial Strategy with Industrial Strategy, Local Growth Plans and other relevant local economic strategies.</p>

Appendix 2

Well connected stations additional information

LPDF & Lichfields

March 2026

Notes to inform LPDF response to the draft NPPF consultation

Our ref 16160/07/MS/ECl
Date 6 March 2026

Subject Draft NPPF Consultation response - well connected stations

- 1 The references under Policies S5 and GB7 to approving the development of housing and mixed-use development within a reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services is strongly supported in principle.
- 2 With regards to eligibility of land for development, “*within reasonable walking distance of a railway station*” offers welcomed flexibility rather than a fixed threshold. However, the Minister’s oral statement to Parliament on 16 December 2025—which referenced a ten-minute or 800-metre distance from a station - may, in practice, encourage some local authorities to treat this as a rigid maximum rather than a context-sensitive measure. As a result, development located marginally beyond this distance could be unnecessarily constrained, despite the absence of a fixed threshold in the proposed wording.
- 3 While it is appropriate to prioritise sustainable locations, an 800-metre benchmark is overly restrictive in many contexts. Evidence shows that 76% of rail users live beyond a ten-minute walk from their nearest station and 70% of residents in England live more than a (longer) fifteen-minute walk from their nearest railway station.¹ This is further reflected in local policies: 64% of local authorities already consider distances greater than 800 metres to be acceptable for new development.²
- 4 In defining accessibility solely using walking distance, the current wording does not allow for other sustainable transport modes to be considered, for example travelling by bus or cycling. By excluding multi-modal accessibility from the criteria, the proposed policy wording could misrepresent genuine connectivity and unduly constrain appropriate development opportunities, by restricting potential land that could be considered. The Department for Transport's 'connectivity tool' could also allow for a more nuanced calculation of connectivity which takes in to account more transport options in getting to a station.
- 5 If cycling were included as an alternative sustainable connectivity measure (to be included as ‘active travel’), five minutes at below average speed would make developments within 1,200m of a train station reasonably accessible, taking into account the time taken to dismount and secure or carry the bicycle.
- 6 This wider consideration of connectivity would more than double the land that could be considered (2.25 times the area) leading to a potential 1.4m homes rather than the current

¹ DfT, 2018, Public attitudes towards train services survey. (para 2.8)

² p14. www.walkwheelcycletrust.org.uk/media/10520/walkable-neighbourhoods-report.pdf

633,000 using Lichfields calculations³. If the threshold for eligibility was widened to stations that had two departures each way during peak hours (6:30–9:30 a.m. and 4–7 p.m.) and in the top 100 TTWAs by productivity, this could be as much as 80,000 hectares of non-built up, unconstrained land leading to a capacity of up to 2.4 million potential homes.

- 7 If the measure of reasonable distance was widened, proposed new developments could for example provide a new bus route as a reasonable sustainable travel alternative. If bus connections were considered, a threshold of 3,000m would be a reasonable journey of approximately 10 minutes (at suburban bus speeds of 11mph). This would open a potential 500,000 hectares of eligible land. See Table 1 for more detail.

Table 1. Train stations by eligibility under current and proposed policy wordings

Policy wording			800m distance from station		1200m distance from station		3,000m distance from station	
Departures	TTWA (GVA rank)	Eligible Stations	Non built-up area (Hectares)	Potential homes (50dph)	<i>Non built-up area (approx)</i>	<i>Potential homes 50dph, (approx)</i>	<i>Non built-up area (approx)</i>	<i>Potential homes 50dph, (approx)</i>
64	60	704	21,100	632,600	47,400	1,423,400	296,500	8,896,100
44	80	933	32,300	969,500	72,700	2,181,300	454,400	13,633,300
44	100	994	35,600	1,068,100	80,100	2,403,200	500,700	15,020,000

Source: Lichfields analysis. The draft NDMP's Policies SP5 and GB7, for land outside of settlement boundaries and in the green belt respectively, proposes that eligible stations are those within the top 60 TTWAs by productivity (Gross Value Added) which have either (i) four departures an hour or (ii) two in one direction through the daytime. Assuming trains run in most stations between 6 a.m. and 10 p.m. The Lichfields analysis uses 64 departures per day as a proxy for the departure frequency criterion, acknowledging that this is likely an undercount given that some stations will have trains that mostly run in one direction, and therefore may meet criteria (ii) with fewer than 64 departures per day. The expanded threshold of 44 departures per day is based on the LPDF's policy suggestion to include stations with two departures each way during peak hours (6:30–9:30 a.m. and 4–7 p.m.).

Figures are estimates for the purposes of national analysis. The analysis does not consider whether individual parcels of land are developable. Estimates of available land are based on mapping all non-built up land (as classified by Ordnance Survey) within a given radius of an eligible station that is not subject to the key national planning constraints, as identified by the current December 2024 NPPF at footnote 7.

Constraint and 'built up land' analysis was not repeated for land within 1,500m or 3,000m of stations. Instead the proportion of non-built up and unconstrained land for each station at 800m was calculated to give ratios that were applied to the larger radiuses of 1,500m and 3,000m for individual stations on the assumption that non-built up and unconstrained land would follow similar patterns at these larger scales. Clearly this is an approximation and is therefore labelled 'approx' in the datasheet.

³ <https://lichfields.uk/blog/2025/december/16/all-aboard-or-stuck-between-stations-how-the-new-nppf-might-unlock-growth-around-rail-stations>

To estimate potential homes for this high-level exercise, we have assumed that the land could be developed at a 60% site ratio (to account for open space, infrastructure etc.) with 50 dwellings per hectare (dph) on the net developable area – this is the minimum density set in the proposed policy L3. In practice the plot ratios and densities across sites around stations will vary depending on their position, site shape, shape, market conditions, infrastructure needs etc. We have not made a judgement on the deliverability or viability of the potential sites. There are also concerns about whether 50 dph is likely to be viable in many market locations.

WELL-CONNECTED STATIONS

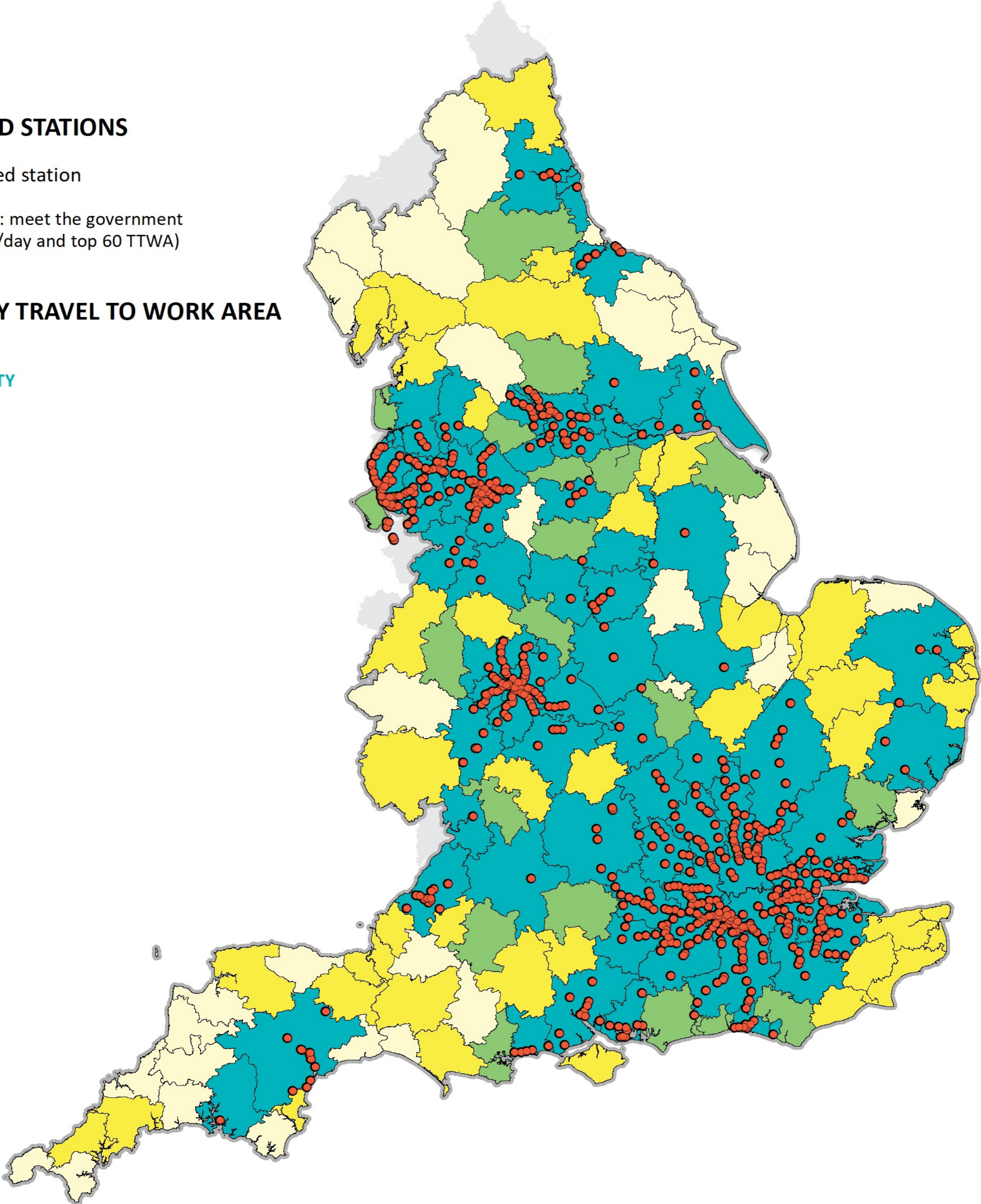
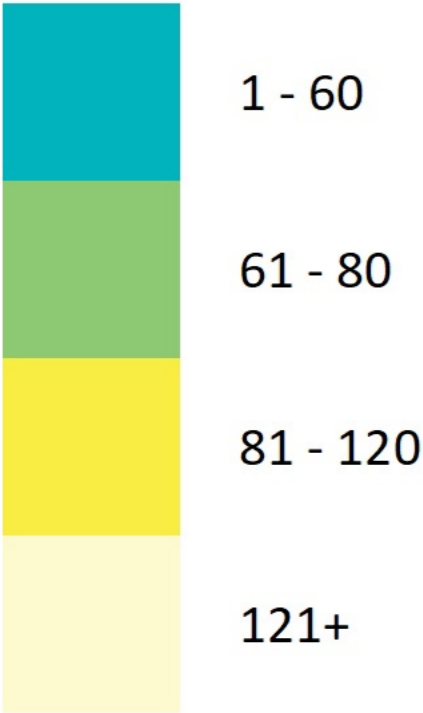
 Well-connected station

Well-connected stations: meet the government criteria (64+ departures/day and top 60 TTWA)

PRODUCTIVITY BY TRAVEL TO WORK AREA

GVA Ranking

GREATEST PRODUCTIVITY



LAND NEAR WELL-CONNECTED STATIONS

Well-connected stations: meet the government criteria (64+ departures/day and top 60 TTWA)

Stations with more than 70 hectares of:

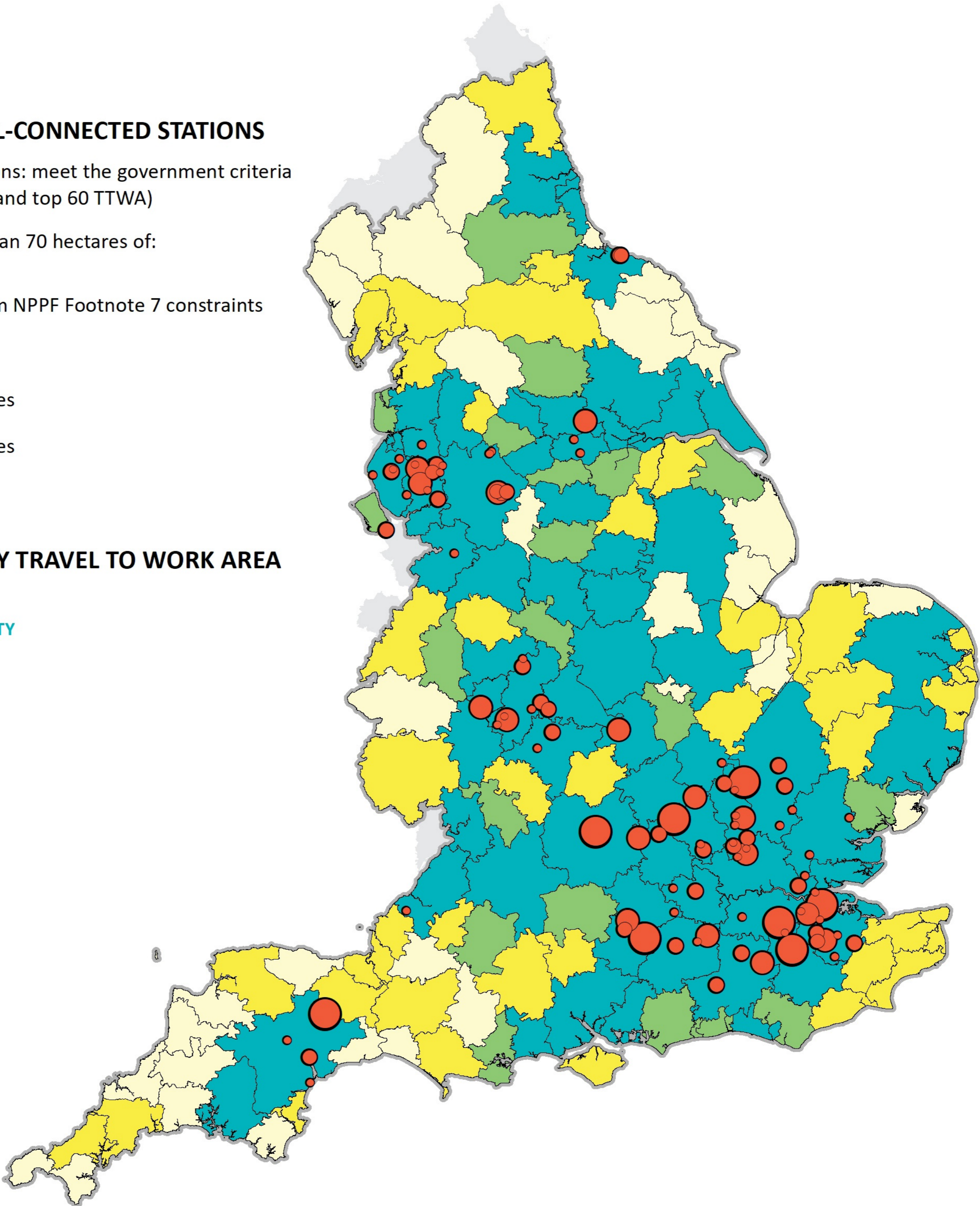
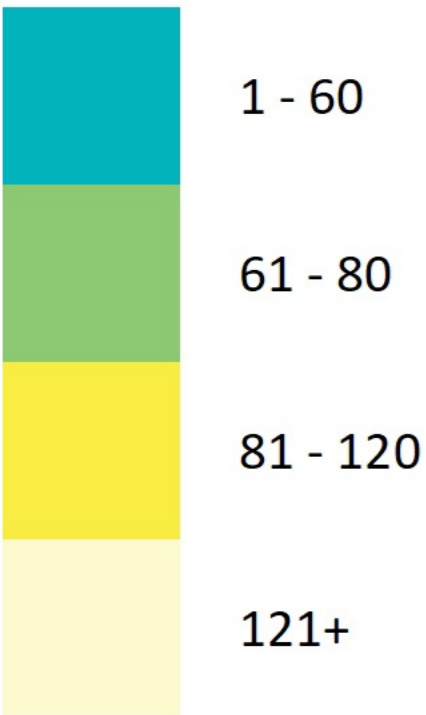
- > Non-built up land
- > Unconstrained from NPPF Footnote 7 constraints

- 150+ hectares
- 125 - 149 hectares
- 100 - 124 hectares
- 70 - 99 hectares


PRODUCTIVITY BY TRAVEL TO WORK AREA

GVA Ranking

GREATEST PRODUCTIVITY



WELL-CONNECTED STATIONS

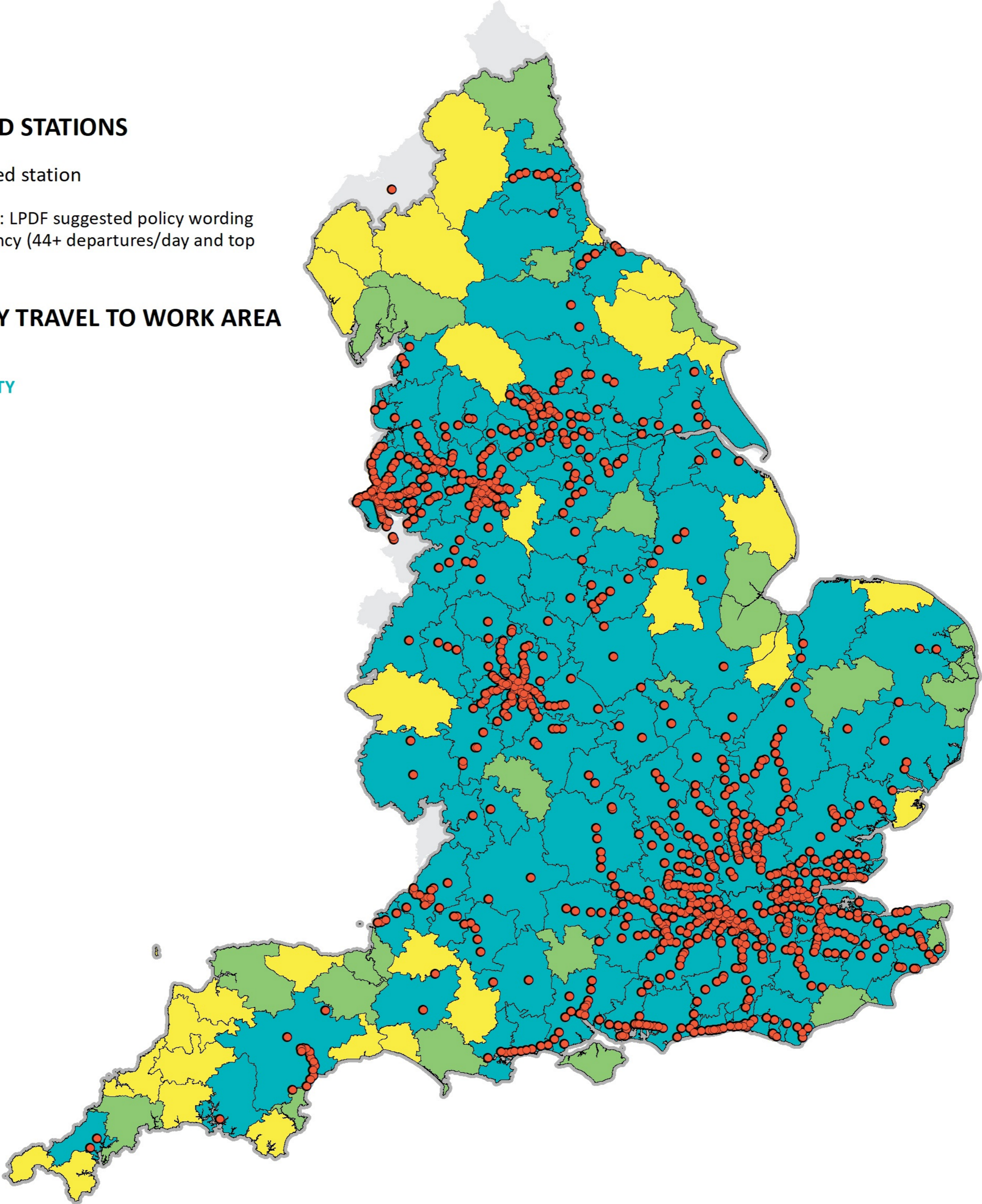
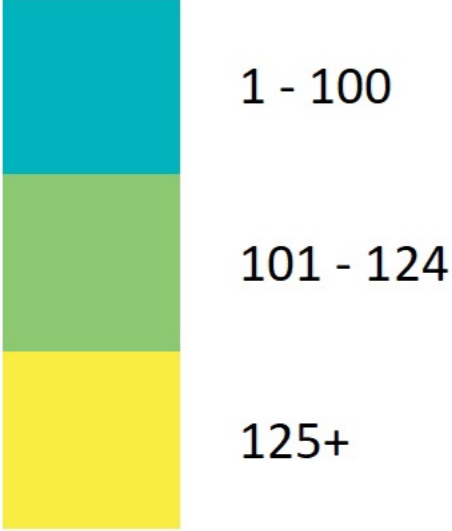
 Well-connected station

Well-connected stations: LPDF suggested policy wording for an expanded frequency (44+ departures/day and top 100 TTWA)

PRODUCTIVITY BY TRAVEL TO WORK AREA

GVA Ranking

GREATEST PRODUCTIVITY



LAND NEAR WELL-CONNECTED STATIONS

Well-connected stations: LPDF suggested policy wording for an expanded frequency (44+ departures/day and top 100 TTWA)

Stations with more than 70 hectares of:

- > Non-built up land
- > Unconstrained from NPPF Footnote 7 constraints

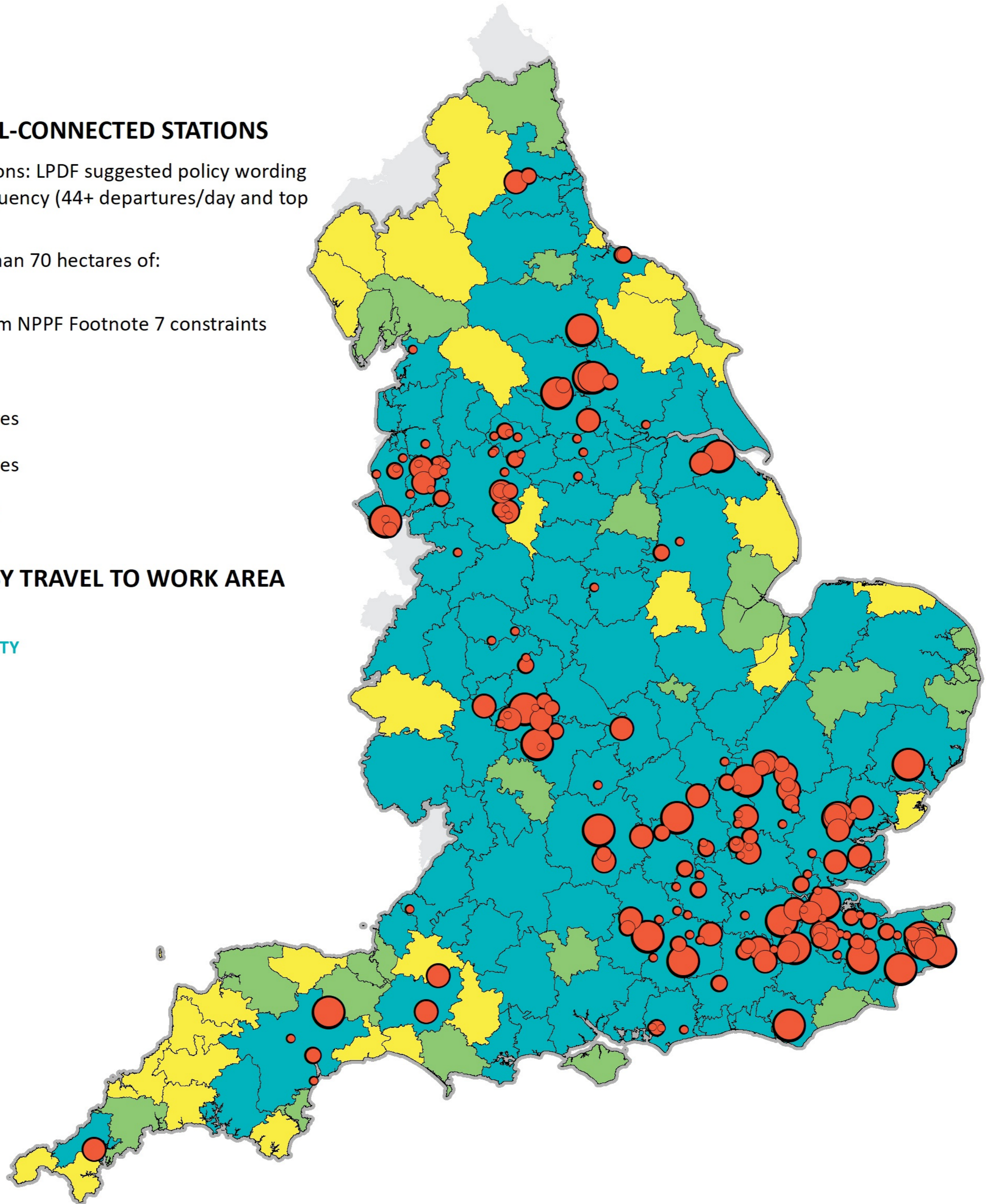
- 150+ hectares
- 125 - 149 hectares
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PRODUCTIVITY BY TRAVEL TO WORK AREA

GVA Ranking

GREATEST PRODUCTIVITY

- 1 - 100
- 101 - 124
- 125+



Train stations by eligibility under current and proposed policy wordings

	Criteria		Stations	800m		1200m		3000m	
	Departures	TTWA		Non built-up area (Hectares)	Potential homes (50dph)	Non built-up area (approx)	Potential homes (50dph, approx)	Non built-up area (approx)	Potential homes (50dph, approx)
England	64	60	704	21,087	632,610	47,446	1,423,373	296,536	8,896,078
	44	80	933	32,316	969,480	72,711	2,181,330	454,444	13,633,313
	44	100	994	35,603	1,068,090	80,107	2,403,203	500,667	15,020,016
Regional breakdown									
Region	Criteria		Stations	800m		1200m		3000m	
	Departures	TTWA		Non built-up area (Hectares)	Potential homes (50dph)	Non built-up area (approx)	Potential homes (50dph, approx)	Non built-up area (approx)	Potential homes (50dph, approx)
London	64	60	53	1,308	39,240	2,943	88,290	18,394	551,813
	44	80	54	1,334	40,020	3,002	90,045	18,759	562,781
	44	100	54	1,334	40,020	3,002	90,045	18,759	562,781
South East	64	60	211	7,078	212,340	15,926	477,765	99,534	2,986,031
	44	80	292	10,856	325,680	24,426	732,780	152,663	4,579,875
	44	100	318	12,722	381,660	28,625	858,735	178,903	5,367,094
South West	64	60	31	927	27,810	2,086	62,573	13,036	391,078
	44	80	52	1,301	39,030	2,927	87,818	18,295	548,859
	44	100	65	1,773	53,190	3,989	119,678	24,933	747,984
East of England	64	60	98	3,581	107,430	8,057	241,718	50,358	1,510,734
	44	80	123	5,674	170,220	12,767	382,995	79,791	2,393,719
	44	100	128	5,841	175,230	13,142	394,268	82,139	2,464,172
West Midlands	64	60	86	1,884	56,520	4,239	127,170	26,494	794,813
	44	80	98	2,508	75,240	5,643	169,290	35,269	1,058,063
	44	100	105	2,724	81,720	6,129	183,870	38,306	1,149,188
East Midlands	64	60	16	404	12,120	909	27,270	5,681	170,438
	44	80	29	1,218	36,540	2,741	82,215	17,128	513,844
	44	100	30	1,289	38,670	2,900	87,008	18,127	543,797
Yorkshire and the Humber	64	60	54	1,384	41,520	3,114	93,420	19,463	583,875
	44	80	86	3,361	100,830	7,562	226,868	47,264	1,417,922
	44	100	89	3,682	110,460	8,285	248,535	51,778	1,553,344
North West	64	60	141	4,051	121,530	9,115	273,443	56,967	1,709,016
	44	80	181	5,315	159,450	11,959	358,763	74,742	2,242,266
	44	100	187	5,489	164,670	12,350	370,508	77,189	2,315,672
North East	64	60	14	470	14,100	1,058	31,725	6,609	198,281
	44	80	18	749	22,470	1,685	50,558	10,533	315,984
	44	100	18	749	22,470	1,685	50,558	10,533	315,984