

Levelling Up and Regeneration Bill: Reforms to National Planning Policy

Response to Planning Policy Consultation: the Edge – March 2023

Q1 Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?

A1 No

Land supply should be a strategic, not a market-led consideration that needs to take into account land use planning, transport connectivity, service and utility availability etc.

Clear targets also allow quality, affordability and responses to the climate and biodiversity emergencies to come to the fore.

Q2 Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

A2 No response

Q3 Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?

A3 Yes, but not to the detriment of releasing small sites

Q4 What should any planning guidance dealing with oversupply and undersupply say?

A4 Before dealing with the issues of under and oversupply it is essential that Local Planning Authorities have the following in place:

1. Adequate resourcing at the local level to fulfil forward-focused, decision-making and enforcement roles
2. Requirements for genuine delivery, monitoring and reporting of social value generation
3. Strategic plans that focus on delivering specific high-level long term goals, to ensure; biodiversity protection and enhancement, sufficient clean water, adequate and appropriate planting to meet carbon and climate mitigation objectives, renewable energy generation capacity, more local housing and employment opportunities, radically reduced pollution and waste and substantially improved public access to open spaces and natural environments for all
4. The ability to base decisions primarily on social and environmental gain rather than relying exclusively on financial considerations
5. Binding local targets for air and water quality, health, safe streets, affordable infrastructure, inclusiveness and net zero
6. A system that links planning requirements seamlessly into Building Control, health and safety practice, facilities management and overall enforcement (the 'Golden Thread')
7. Requirements to retain as much existing physical value as possible through strategies including retrofit, adaptation and re-use before considering demolition and building anew.

8. A clearly articulated balance in planning strategy and guidance between cultural and heritage considerations and social and environmental needs
9. Measures to control, when necessary, land value and rental charges
10. Commitments and resources to enable community ownership and management of land and other assets for community benefit
11. Leadership: A clear commitment to use planning as a tool for genuinely engaged communities, local and national government, developers and other stakeholders to collectively respond to some of society's greatest challenges.

Q5 Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

A5 No response

Q6 Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

A6 Yes. It is essential to reinforce the guiding principle that housing and other development must be set within the context of protecting the environment and tackling climate change.

Q7 What are your views on the implications these changes may have on plan-making and housing supply?

A7 Plan-making that provides answers and a framework for coping with major strategic issues that affect the UK is essential if appropriate housing is to be made available for the future while dealing with the provision of the necessary physical and social infrastructure and responding to the pressing challenges of environmental degradation and climate change.

Any measures that do not encourage properly resourced and consulted-on plan-making are to be strenuously avoided

Q8 Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

A8 Yes. It is essential to reinforce the guiding principle that housing and other development must be set within the context of meeting environmental targets, tackling climate change, supporting community wellbeing and as a means for expressing the spatial delivery of a wide range of public policies for urban and rural areas. The presence of green spaces must also be included to further public wellbeing as must impacts on congestion, air quality and inclusivity.

We also note that the provision of social housing and land supply has fallen far short of what is required. Local authorities should prioritise and be given the ability to make appropriate land available.

Q9 Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of

character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

A9 Yes. the Edge is concerned at the unconsidered threat to green belts simply in order to meet housing targets. Green belts are an important constraint/strategic planning mechanism and offer both social and environmental benefits and should be maintained as such.

Q10 Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?

A10 The pejorative term 'out-of-character' is unhelpful here. Policy should be clear and unambiguous, whilst allowing a degree of flexibility to enable it to be used appropriately in a varied range of circumstances. Good planning and well-designed development must be used to provide high quality, appropriate development that fulfils longer-term needs and benefits and the potential for this should be clearly demonstrated. The danger to be avoided are short-term responses that turn out to have long-term disadvantage, the potential for generating stranded assets and significant financial, social and environmental cost. The benchmarks should be social and environmental gain into the foreseeable future.

Q11 Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?

A11 See answer to Q10 above

Q12 Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

A12 No response

Q13 Do you agree that we should make a change to the Framework on the application of the urban uplift?

A13 the Edge agrees with the principle of the urban uplift, but with two caveats: 1) there should be proven need and appropriate infrastructure in place to support the uplift; and 2) Planning strategy guidance should be required to be put in place to facilitate the necessary infill of low density but well-connected neighbourhoods and suburbs in urban areas

Q14 What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

A14 Planning strategy guidance is urgently required to facilitate the necessary infill of low density but well-connected neighbourhoods and suburbs in urban areas

Q15 How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

A15 Appropriate infrastructure should be required to be put in place to support agreed levels of uplift

Q16 Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

A16 No response

Q17 Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

A17 No response

Q18 Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

A18 No. This would create inequity between large developers and SMEs. However the requirements for ‘sustainable development’ should be greatly tightened in line with the legal commitments for net zero under the Climate Change Act

Q19 Do you consider that the 115% ‘switch-off’ figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

A19 See response to Q18 above

Q20 Do you have views on a robust method for counting deliverable homes permitted for these purposes?

A20 See response to Q18 above

Q21 What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

A21 No response

Q22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

A22 Yes - Social rented housing is a national infrastructure requirement and more well-designed social rented housing stock is needed. The NPPF needs to reinforce that,

This priority should be reflected in proposals for land supply and as part of the definition of sustainable development.

Q23 Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people’s housing?

A23 Yes - The number of people aged 75 years and over living on their own is projected to increase by 461,000 in the 10 years to 2028 [ref: ONS]. However as current guidance and obligations

are weak and uneven a more considered approach to embedding inclusive environments within the planning system is required, including far greater access to high quality green spaces and infection resilient environments

Q24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

A24 The policy is clearly not working as effectively as it should at present given the strong, albeit anecdotal, evidence of everyone who grapples with the under-resourced, unwelcoming and clearly broken state of the current planning system

Small sites are important for generating competition, quality, innovation and diversity in the market which can help deliver more locally responsive and produced building completions and radical retrofits especially by SME builders and developers. A reformed planning system must support, rather than discourage as at present, the use of small sites and facilitate their use particularly in urban areas for demonstrating creatively design and truly effective sustainable and socially focused development.

Q25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

A25 A national land use database together with local initiatives should support a well considered small sites policy and allow Local Authorities, Homes England and others to assist in making land available at lower cost to community developers. Large site developers should also be encouraged to make a proportion of their sites available to SMEs, community groups and self-builders.

Q26 Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

A26 Yes. Although the definition also needs to be rewritten to ensure that affordable housing is truly affordable to those in the two lower quartiles of household income

Q27 Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

A27 Available planning resources and consideration together with obligatory status and targets in local strategic plans. Diversity of supply should be a major consideration of planning policy

Q28 Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

A28 See A27 above

Q29 Is there anything else national planning policy could do to support community-led developments?

A29 the Edge strongly recommends that social value should be significantly strengthened in the NPPF to become a core component of the Framework alongside 'Achieving sustainable development'. Social value considerations should go well beyond the current social objectives of delivering housing numbers and fostering 'beautiful and safe places'.

Q30 Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?

A30 Yes – but this should be a last resort where there has been clear abuse of process and flouting of planning requirements.

Q31 Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?

A31 Neither - Developers should be required to provide clear evidence against a clear time schedule (including for build out) that they have delivered as permitted – e.g. in terms of sustainability standards and performance in use. This requires better legislation – c.f. the GLA's 'Be Seen' policies

Q32 Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

A32 Yes - The transparency of performance is a welcome requirement

Q33 Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

A33 Yes - the Edge strongly supports the importance of placemaking. However the word beauty is highly liable to misinterpretation although we support its use as an expression of good performance in use, i.e. well designed and well functioning over time.

Q34 Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places', to further encourage well-designed and beautiful development?

A34 Emphatically No - The use of the word 'beauty' is highly subjective and will lead directly to unnecessary and divisive 'style wars'. We need a well-designed built and natural environment that celebrates diversity and performance against demanding economic, social and environmental standards

Q35 Q5 Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

A35 Yes – Clarity is good, but not if it is used to throw more barriers in the way of good and timely design. Planning conditions are currently overused as a means of running a second stage of planning consent and necessary delaying progress

Q36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to

consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

A36 Yes - the Edge supports intelligent intensification of use of existing buildings but the specific reference to mansard roofs is unnecessary as there may be other, equally valid means of modifying such properties. The paragraph should be rephrased accordingly.

Q37 How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?

A37 Artificial grass is not an option if there is a serious intention to integrate nature into new developments. Equally, not allowing or promoting artificial grass, also means not allowing unnecessarily large areas of hard paving instead. Permeable paving, whether through permeable blocks or gravel can be easily substituted, as policies that ban paving over drives or gardens has not been effective.

All local planning authorities need to have clear adopted strategies and policies about the integration at all scales of nature recovery strategies, tree strategies, biodiversity and environmental net gain with strategies on local land use, potential development sites, transport infrastructure etc.

Q38 Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?

A38 Yes - A comprehensive land use framework for England, along with the necessary data on quality of soils and how the land is needed to achieve the most productive and purposeful outcomes from the land. Food security is an ever-increasing issue and how the land is used, and not only for the most productive uses, must be weighed in the planning balance.

As part of the overall strategy a land use framework should drive:

- A zero carbon emissions national economy
- Equitable and fair access to opportunities, resources, goods and services
- Healthy and safe environments
- Maintenance and enhancement of biodiversity
- Enhancement of ecosystem services and nature-based solutions to climate related threats, including flooding, soil erosion and the urban heat island effect
- Food, resource and energy security
- The wellbeing of future generations

Q39 What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

A39 the Edge strongly supports the introduction of a mandatory requirement to undertake whole life carbon assessments for developments. This would bring increased clarity and improvements to designs through requiring whole-life carbon and embodied carbon assessments and commitments to be submitted as part of the planning process. Such whole

life considerations are already starting to be introduced in some local authorities, including the Greater London Authority: this has already helped develop experience across industry to produce such assessments, is producing useful WLC data to inform future policies, and learning on how best to write and implement such policy.

Consistency is important, and the focus needs to be on producing the right outcomes, alongside data to support individual decisions as well as collective learning. We need to move on from the mercurial nature of how whole-life Carbon is looked at in planning. For example, while the aforementioned GLA WLC policy is overall a positive step forward, it has nonetheless seen a number of recent inconsistent planning decisions where even sensible outcomes on embodied carbon have been arrived at through an uncertain, expensive and drawn-out process. This is not an argument against these policies, but an example of why consistency is needed, and why lessons need to be learnt from early, leading, local authority policies:

Clear guidance and an effective regulatory framework for whole life carbon that ensured it was be accounted for early within a project would be hugely beneficial in terms of costs and effectiveness of reducing carbon emissions. It could have further benefits as Defra has in the past estimated that each year we send 5 million tonnes of construction and demolition waste to landfill and 26 million tonnes of excavation waste is not recovered.

the Edge supports the use of the standard whole life carbon assessment methodology that is the RICS Professional Statement 'Whole life carbon assessment for the built environment 2017', on which the GLA policy is based and which is increasingly widely adopted across local authorities and industry. The RICS methodology is specifically aligned with the British Standards for Carbon assessment in the built environment BSEN15978 (Buildings), and BSEN15804 (products). The RICS Professional Statement is currently being updated with a publication date in June 2023. The RICS methodology will cover all building types, including retrofit and refurbishment, new build, mixed use schemes and infrastructure.

Beyond the planning system, the Edge is a supporter of the Part Z initiative, which calls for regulation of embodied carbon through building regulations, bringing further consistency. This can and should work in tandem with attention at the planning stage, with increasing levels of detail from planning through to design and as-built building regulations submissions.

Greater attention to embodied carbon is needed, but does not negate the need to address operational carbon. Operational carbon is not comprehensively dealt with by Building Regulations and we very much welcome the acknowledgement in the consultation that some local authorities have been leading the way, that they need to be supported, and that we need to find ways for others to learn and build from this. Edge partner organisation CIBSE has provided a briefing for Local Authorities, for the purpose of sharing resources and lessons, and providing consistent evidence and approaches: <https://www.cibse.org/policy-insight/position-statements-and-briefings/introducing-energy-use-targets-in-planning-policy>. We also note the 'Carbon Jargon' publication from the NHBC Foundation, which provides a glossary of terms which should be of use for both planners, housebuilders and professionals undertaking assessments.

Q40 Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?

A40 The planning system must support (integrated into the placemaking agenda) prioritising safe walking and cycling, microclimatic cooling through bodies of planting, biodiversity through percentage gain and ecological corridors and green and blue infrastructure. In relation to new developments, planning should require designs to be responsive to orientation to maximise beneficial solar gain but minimise overheating;

Climate Risk

The UK's Third Climate Change Risk Assessment (CCRA3) published by the Committee for Climate Change in June 2021 assessed a number of risks that the planning process is well placed to help tackle. These include:

High – More Action needed

- N1 & N2 Risks to Terrestrial Species and habitats
- N4 Risk to soils from changing conditions, including seasonal aridity and wetness
- N5 Risks to natural carbon stores and sequestration from changing conditions
- I2 Risks to infrastructure services from river and surface water flooding
- H1 Risks to health and wellbeing from high temperatures
- H3 & H4 Risks to people, communities and buildings from flooding / sea level rise
- H6 Risks and opportunities from summer and winter household energy demand
- H8 Risks to health from vector-borne diseases
- H11 Risks to cultural heritage
- B1 & B2 Risks to business sites from flooding / coastal change

Medium – Further investigation required

- N18 Risks and opportunities from climate change to landscape character
- I3 & I4 Risks to infrastructure services, bridges & pipelines from coastal flooding and erosion
- H5 Risks to building fabric
- H7 Risks to health and wellbeing from changes in air quality
- H9 Risks to food safety and food security
- H10 Risks to health from poor water quality and household water supply interruptions
- B5 Risks to business from reduced employee productivity – infrastructure disruption and higher temperatures

Low – Sustain current Action, Watching Brief

- B4 Risks to finance, investment, insurance, access to capital

In particular the Report highlights the danger to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings. In part this has been addressed through the introduction of Part O of the Building Regulations, but the Planning system also has a major part to play, through attention to issues including building orientation, planning

for good ventilation around and through buildings and ensuring that nature-based services including trees, plants and water features are included in development plans.

In the face of such risks the planning system needs to encourage and incentivise adaptation and resilience measures while ensuring that these are of good quality and effective. These, by necessity, include both new and existing developments and buildings. If this doesn't happen there is a high risk that a large number of buildings will become unusable for extended periods, whether because of flooding, overheating or infestation. This in turn may create social and economic upheaval that will spread far beyond the immediate building occupiers and owners.

National guidance should be published on

1. Retrofitting resilience and adaptation measures in heritage properties and conservation areas. Up to date local guidance could override national guidelines if it goes over and above national requirements

Local planning authorities should have:

1. Adopted Climate Adaptation Strategies
2. Adopted local land use strategies
3. Adopted tree and woodland strategies including monitoring and management.
4. Adopted green infrastructure strategies including monitoring and management.
5. Adopted comprehensive and long term management plans to ensure that 'SuDS on the surface' that use trees and planting are fully integrated

Planning measures required for new developments and major refurbishments should require:

1. Resilience risk assessments with a 25 year horizon, covering at least; power outages, flooding, overheating, the local microclimate and potential threats to health
2. Impact assessments on neighbouring and other affected properties and environments including the cumulative effects of proposed changes
3. Recovery plans in the event of harmful climate related incidents to be in place at planning stage
4. Recommended and agreed resilience measures and maintenance procedures to be put in place
5. Designs that incorporate effective passive measures to minimise heat loss and overheating at planning stage. These should potentially include fabric improvements, ventilation, shading and thermal capacity
6. Recognition of building orientation (especially with reference to overheating from unprotected glazing on south and west facades). For the avoidance of doubt the elevations should not be the same but rather be appropriate to their orientation
7. Measures for developments (and/or local areas) to ensure continuity of basic and essential services during short term (48 hour) infrastructure failure
8. Identification and provision of safe and appropriate refuges for use during adverse climate events
9. Existing natural features and habitats to be protected and enhanced wherever possible

10. Contributions to be made through planning obligations for local nature recovery and biodiversity gain
11. Access to adequate external green and/or blue space on the site of or within 10 minutes walk of the development.

Microclimate

Microclimatic cooling reduces building energy loads and improves human comfort and local air quality; dual aspect homes improve heatwave resilience.

Planning policy should consider microclimate design in the form of 'climate-based masterplanning' for new developments as part of climate change adaptation and mitigation. Planners need to understand the role of built form and green infrastructure as well as generally considering orientation and air flow. Such an approach is rarely considered.

Nature based solutions

If planning is to deliver nature-based solutions for the many benefits that can be provided, then all local authorities should have:

1. Adopted Climate Adaptation Strategies
2. Adopted Local land use strategies
3. Adopted tree and woodland strategies including monitoring and management.
4. Adopted green infrastructure strategies including monitoring and management.
5. Ensure that 'SuDS on the surface' that use trees and planting are integrated all the time, everywhere, and that their ongoing management and maintenance is properly covered via adoption based on a comprehensive and long-term management plan

'Adopted' is critical as these strategies cannot sit on the sidelines as 'guidance' only.

Trees

Trees should be in a separate strategy albeit integrated with a number of other strategies, but not a sub-set of a GI Strategy. Trees have very long lives and once established are, or should be, permanent infrastructure elements. They should not be subject to change as other elements of GI can be, especially green roofs and walls.

Q41 Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

A41 Yes – but the 'should' in the first line of the wording ought to read 'must'

Q42 Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

A42 Yes

Q43 Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?

A43 No - Enabling local communities to benefit from local renewables should be a key incentive mechanism, without which local opposition will prevail - this needs to be prioritised.

LAs should be empowered and resourced to do authority-wide carbon-based planning and renewable energy supplies are key to this.

Q44 Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

A44 No - The proposed new paragraph should be rewritten to refer to all buildings and to lose its overly repetitive quality. An alternative wording is suggested. In addition the use of the word adaptation has a specific and different meaning in this context and has been substituted.

It is also noted that there is no equivalent clause for the necessary adaptation of buildings to cope with the impacts of climate change and a proposed Paragraph 162 has been added.

Potential alternative text for NPPF Paragraph 161 (plus an additional Paragraph 162):

161. To support energy efficiency improvements and the reduction of carbon emissions, significant weight and encouragement should be given to the need to support the alteration of existing buildings, including both domestic and non-domestic buildings, in order to improve their energy performance (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Proposals affecting conservation areas and listed buildings should be determined by reference to national and local guidance on specific measures and the weighting to be applied between environmental and heritage concerns.

162 To support adaptation of existing buildings to current and predicted environmental change, significant weight and encouragement should be given to measures that reduce harm and improve safety, wellbeing and comfort in and adjacent to them (including through installation of passive measures such as shading, fabric improvements, improved ventilation, adequate thermal mass and landscape solutions and active measures including mechanical ventilation heat recovery (MVHR) systems, but not air conditioning, where these do not already benefit from permitted development rights). Proposals affecting conservation areas and listed buildings should be determined by reference to national and local guidance on specific measures and the weighting to be applied between environmental and heritage concerns.

Q45 Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

A45 No response

Q46 Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

A46 No response

Q47 Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

A47 No response

Q48 Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

A48 No response

Q49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

A49 Yes - The proposal to introduce development management policies is supported but local planning authorities should retain the ability to use these flexibly in relation to specific circumstances and localities.

Q50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

- A50
1. Soil quality and management of soil to minimise damage during construction – see The Soils in Planning and Construction Task Force report <https://wp.lancs.ac.uk/sustainable-soils/files/2022/09/Soils-in-Planning-and-Construction-Sept-22.pdf>
 2. A national whole life carbon methodology
 3. Closer integration with Building Control
 4. A post-completion inspection to ensure what is built delivers what was promised

Q51 Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

A51 Yes – specific ones to be carefully considered

Q52 Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

A52 Having achieved a comprehensive land use framework for England, all Local Authorities need their own local frameworks so that they have current data on land use, biodiversity, tree cover, areas of flooding, underground assets/utilities etc., etc.

Planning must engage with a wide range of policies with nationally agreed principles, although needing some local variations, including building regulations, air quality, climate change adaptation and mitigation, water management, health, employment, reducing social and economic inequality etc. All councils should ensure that their policies are integrated and do not conflict. This is valuable, not only for small builders but for consultants, of different size, working in different local authorities where they have to spend too much time assessing different policies.

Manual for Streets to be adopted as national guidance as a default instead of the ad hoc rules used by Local Authorities

Support for greater biodiversity net gain and an obligation to improve soil quality

Q53 What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

A53 The construction industry has a significant role to play in delivering Levelling Up and is well-placed to deliver immediate and long-term strategies for future regeneration, improving the quality of housing and building the necessary knowledge and skills to match the Levelling Up ambition.

Effective measures to mandate joined-up thinking both between departments and through the various tiers of governance would support the planning system and the industry in delivering Levelling Up. This would have to go beyond reporting and foster collaboration. If carried out well, the digitalisation of planning should increase efficiency, transparency and local accountability and should speed up both the processing of planning applications and the adoption of local plans.

Collaboration is critical within supply chain and to ensure the effective and efficient delivery of housebuilding and wider infrastructure projects, the Government must work with the construction supply chain and more importantly, support its transformation and modernisation.

With a growing population and serious challenges such as climate change adaptation and meeting the missions set out in the Levelling Up Bill, we are also concerned that government's reform proposals could be seriously undermined in the short term by a lack of resources and skills within planning departments. The Framework needs to treat planning as more than a means to an end.

See also the Edge's Policy proposals for the built and natural environment (November 2022) - https://edgedebate.com/s/theEdge_PolicyProposals_1122.pdf

Q54 How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?

A54 The proper delivery of all planning infrastructure needs more careful consideration, and funding. All too often, the social infrastructure of new development promises much, but then fails to deliver both on quality and quantity, and through the timing of its delivery. In particular, social infrastructure should be planned and implemented early so it can serve new development from the completion of each area or parcel of land.

Sustainable transport should be in place in anticipation of new housing development. Similarly, the nature and quality of the infrastructure must be designed to fulfil the needs of the new community.

Similarly blue and green infrastructure needs to be delivered in advance of development to enable it to become established prior to active use, thereby reducing damage and potential vandalism. Such an approach would also ensure that what was approved at planning is actually delivered. Whilst some aspects of water management may not be possible to deliver

early, each site needs specific consideration to confirm what, with ambition, can be delivered. A full justification should be required from developers to explain what cannot be delivered and why.

The government's stated aim for 'Levelling Up' is to "transform the UK by spreading opportunity and prosperity to all parts of it". Upgrading the energy efficiency of existing homes through repair, maintenance and improvement (RMI) work should therefore be an integral part of these plans. Unfortunately, no new major funding or sustainable built environment initiatives were announced within the context of the relevant missions or reforms, and plans for a National Retrofit Strategy are still only at an exploratory stage.

Retrofitting work is labour intensive and grounded within local supply chains, making it an ideal project to maximise employment within the construction sector, support regional growth and provide opportunities for training and retraining in low-carbon construction skills. Retrofitting to improve energy efficiency will reduce consumer utility bills, support local businesses by acting as a gateway to further domestic or commercial projects and free up disposable income to be spent within local economies.

The Construction Leadership Council's National Retrofit Strategy – unveiled in 2021 - is supported by much of industry and sets out a twenty-year blueprint to transform the nation's housing stock to make it greener and more energy efficient. Modelling for the strategy showed that if the Government had invested just over £5 billion by the end of this Parliament, then this would unlock 100,000 jobs, generate Government revenues of more than £12 billion, and provide additional GDP of up to £21 billion.

With the 'cost of living' crisis now requiring urgent government intervention, more recent assessments have been even more positive about the local benefits of green home upgrades.

Unfortunately, there is a chronic shortage of skills in the retrofit sector, with the CLC estimating that the existing workforce needs to be more than doubled, developing around 500,000 new professionals, to address this challenge. This will, however, not be possible without a long-term roadmap which gives the industry certainty in the future direction of travel and confidence that there will be an ongoing market for retrofit.

The Government urgently needs to follow the recommendations made in the Green Jobs Taskforce's July 2021 report, particularly to build on existing work to review green apprenticeships and mapping, reviewing and enhancing other training pathways (for example traineeships, T-levels, internships and skills bootcamps) to ensure they support a diverse, inclusive and net zero aligned workforce across the UK.

Government should be aware that meeting the challenges of climate resilience, adaptation and mitigation will require heavy expenditure in the decades ahead. Public and private sector funding must be sufficient to not only meet these challenges comprehensively but to deliver on the missions set out in the Levelling Up and Regeneration Bill.

It is a necessity to ensure both new and existing buildings are future-proofed for resilience. Research published in the journal Science suggested that, the children born in Europe and central Asia between 2016 and 2020 will experience about four times more extreme climate-linked events in their lifetimes under current emissions pledges.

In its recent Independent Assessment of UK Climate Risk, the UK's independent adviser on tackling climate change – the Committee for Climate Change – reported high and immediate risk to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings. Specific measures contained in the Building Regulations can only go so far and failure to address these risks – which also include flash flooding - on a local level will completely undermine the government's Levelling Up agenda.

The risks are diverse and need to be mapped out and addressed comprehensively in the planning system with funding made available where appropriate. We feel that both government actions and local governance resilience planning is behind the curve here. For example according to the Local Government Association coastal special interest group it is thought there are approximately 1,200 to 1,400 historical coastal waste dumps in the UK currently at risk of erosion and flooding, a potentially huge and costly problem and one exacerbated by rising global sea levels.

Q55 Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

A55 Yes – City densification is vital

Q56 Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?

A56 Yes

Q57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

A57 So much of planning policy hinges on improving how planning services are delivered by Local Planning Authorities and we restate our concerns that government's reform proposals could be seriously undermined in the short term by a lack of resources and skills within planning departments.

Q58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

A58 No response.