

# **NPPF Proposed Reforms Consultation**

## **Burwash Parish Council Proposed Response**

### **General Summary**

The Parish Council is deeply concerned that the proposed revisions to the NPPF will place unsustainable and disproportionate pressure on rural parishes. The continued reliance on the Standard Method, with its affordability uplift, risks imposing housing numbers that reflect market desirability rather than genuine local need. In rural areas such as Burwash, high house prices are driven by environmental quality, landscape character and proximity to protected areas and not simply by undersupply. Applying inflated targets in this context will not meaningfully improve affordability but will result in incremental and irreversible loss of countryside, wildlife habitats, agricultural land and the setting of historic settlements, as highlighted in the CPRE Sussex response to the NPPF. This is even more significant to Burwash Parish Council who sits within the High Weald National Landscape and is active in protecting the National Landscape.

There is also serious concern at the increasing centralisation of planning powers and the erosion of meaningful local democratic input. The combined effect of nationally prescribed housing targets, Housing Delivery Test penalties, five-year land supply requirements and strengthened national decision policies risks sidelining neighbourhood plans, planning committees and the role of locally elected councils. In rural parishes, where infrastructure is limited and services are fragile, speculative edge-of-settlement development may be approved simply because targets are not met, regardless of landscape impact or community views. Much of this development is usually unaffordable to the local community and without any Local Lettings Plans any true affordable properties go to people outside of the community. This undermines the plan-led system and reduces the ability of parish councils and local planning authorities to shape development in a way that reflects local character and capacity.

As a final comment it must be noted the support for CPRE Sussex's concerns regarding the weakening of landscape protections, particularly the removal of clear support for safeguarding "valued landscapes" and the dilution of policy tests for development within Protected Landscapes. Much of the countryside around rural parishes is not nationally designated yet performs critical functions including ecological connectivity, flood storage, food production and the preservation of settlement identity. Policies that favour development near railway stations or within broad "growth corridors" must not override these considerations. Housing need and governance structures may change over time; the loss of countryside is permanent. The NPPF must therefore clearly embed throughout the framework a presumption in favour of protecting National Landscapes, recognising rather than ignoring infrastructure capacity and ensure the long-term protection of rural places and communities, ensuring that growth is genuinely sustainable and led by genuine local need and benefit rather than driven by short term supply pressures for the wider districts.

**ENDS**

### **Question 1**

Clarity and usability of any major document or new process is important. However, there needs to be a clear snapshot of the process along with clear flow charts and diagrams on how these along with existing policies affect each other and how any changes relate to rural vs urban areas. Introducing even more policies under the National Development Management policies needs clear and precise clarity on how this will affect policy and plan making within areas particularly where plans have not been updated.

### **Question 2**

The proposed format and structure appears sensible. This should make it easier for users to understand which policies apply at different stages and improve overall navigation of the framework. However, the effectiveness will depend on how the two levels of policy interact in implementation, particularly given there will also be the added layer of National Development Management Policies. Clear guidance is needed on cross-referencing, the relative weight to be given to nationally set decision-making policies versus locally prepared plans, and the status of Neighbourhood Plans. This will help avoid centralisation of process and ideas which will result in a planning system which ignores local and specifically rural character and risks seriously erasing the local voice/opinion.

Additional considerations are:

1. Neighbourhood Plans showcasing the local residents views and overview of the locality.
2. Water companies should become statutory consultees
3. Clarity around how local plans developed at District level will feed into new plans from Unitary and Mayoral/Strategic Authorities.
4. Local Plans must understand local context or engage clearly with Neighbourhood Plans for such detail.
5. Locally prepared plans should be more consistent across the country. Whilst not having replication of policies in Local Plans and the NPPF is important, so is having better consistency about the policies and expectations within locally made plans.
6. If specific landscape properties such as National Parks, Areas of Outstanding Natural Beauty and National Landscapes are not given separate policy chapters within the NPPF then there should be a requirement that they feature within locally made plans. There will be a clear pressure between the 'efficient land use / delivery' versus the need to protect landscape character, dark skies, tranquility, heritage settings, and safe movement on rural roads. Dedicated policies on these issues need to be outlined to ensure the right weight is given to these highly protected landscapes.

### **Question 3**

The annexes are useful as they help guide how the decision-making process on specific matters is determined. Concerning that only certain key policy areas have been focused on. No specific mention on National Landscape assessment for any intended development yet there is for green belt sites and flood zones. To protect these areas and National Parks better guidance and clarity on the weight of

these areas needs to be given vs the pressure of needing to deliver housing. This is specifically important to local areas with significantly high areas within a National Landscape. Concise annex summaries or a mapping table (“what changed vs 2024”) would materially improve accessibility and understanding for those within Parish Councils.

#### **Question 4**

It is helpful for the policy to be included to have one document as this gives clarity. However, there is a need for reassurance that there will be site selection safeguards (access, services, landscape, flood risk) which are specific for rural/AONB areas to ensure sites and need to find sites and not pushed into inappropriate locations. The NPPF should explicitly reaffirm that meeting need must still be achieved through suitable, deliverable locations and not weaken the ability to refuse harmful sites.

#### **Question 5**

Consistency is welcome because this removes the room for the interpretation of policies through semantics. There is an issue that if the term “substantial weight” is used regularly it can become a blunt instrument to push housing through even in unsuitable/unsustainable areas or protected landscapes. For parishes within National Landscapes/AONB, it is important that “substantial weight” for housing delivery does not dilute the need to protect landscape character and heritage setting are central to place identity within these National Landscapes which should have the highest protection.

#### **Question 13**

Proportionate evidence is good, but in AONB areas the evidence that needs to be at the forefront of the decision making is the impact on the landscape, the natural heritage of the area, impact on dark skies/tranquillity, and wastewater capacity. For smaller rural parishes, outdated evidence leads quickly to poor decisions. “Only update if strong reasons” must not discourage updating when there are known constraints to allow for unsuitable development.

#### **Question 14**

Faster and more transparent site selection is welcome, but any “fast” approach must still allow proper testing of the cumulative harm to landscape character along with the incremental erosion of the settlement edge and village identity. It must also be acknowledged that “small sites” create disproportionate pressure on lanes, on-street parking, and village services especially rural GP practices.

#### **Question 15**

Cross boundary planning is crucial where there are AONB constraints which limit options for development. There is a danger of unmet needs spilling into or abutting up to the most sensitive places. It is important that provision in these circumstances is made to engage parish councils at an early stage because cumulative impacts often appear at parish scale and should be identified.

**Question 16**

In small villages it must be acknowledged that even a few homes can trigger real impacts for residents in terms of issues such as traffic pinch points, play spaces, surface water and loss of green spaces. Certainty reduces any late negotiation and can strip out proposed mitigations. Essential that clear expectations for contributions that directly matter locally and can mitigate those issues are identified. This needs to be done along with any 'viability reports' again to ensure that these mitigations are not stripped out later.

**Question 17**

National policy should set clearer minimum expectations, with local tailoring. Parish experience is that viability based renegotiation can remove the very mitigation that makes a scheme acceptable for the local community. A national baseline of when reviews must happen would protect communities to an extent. However, any mechanisms MUST consider the planning permission given and the conditions of that permission in balance with viability. Parish experience is local communities are promised a vast range of 'benefits' whether open spaces, affordable rented properties etc. only to have these stripped away at later stages.

**Question 20**

Neighbourhood plans in protected landscapes need "room to localise" without being accused of duplication. The plan-making chapter (especially the strengthened "no duplication" direction for neighbourhood plans at examination) risks being interpreted too rigidly for AONB parishes, where the whole point of neighbourhood planning is to express locally distinctive landscape, dark skies, tranquillity, heritage-settlement form, and access constraints in a way that is useful when making decisions on development within the Parish. A clear directive is required to enable neighbourhood plans to interpret national policy through locally specific criteria and associated mapping. This could include matters such as key views, settlement edges, locally valued green spaces, wildlife corridors, without being treated as restating national policy. Especially as the national policy around the protection of National Landscapes/AONB can be so heavily ignored when the 'weighting' of housing need.

**Question 25**

The Draft NPPF December 2025 version of DM5 is easier to understand than the 2024 version because it is clearer in outlining when developers are allowed to claim that a proposal is not viable in meeting planning requirements. It also requires those claims to be based on the financial assumptions already tested when the local plan was prepared, rather than introducing new ones later on in the process. Importantly, it keeps the focus that if a development follows planning policy, there is an assumption for that site to be financially viable without needing to reduce agreed contributions or standards.

The risk in small parishes is the size & density of the sites. It is usual for small parishes to look at small to medium with an array of potential issues ranging from access, drainage, landscape mitigation,

biodiversity, or heritage constraints. This means in practice even with the limits outlined in DM5 applicants may still use the complexity of smaller rural sites as leverage to renegotiate contributions. Usually within rural Parishes those contributions pay for bespoke, essential mitigation such as native landscape planting, footpath links, traffic calming on narrow lanes, dark-sky sensitive lighting, and long-term habitat management. If special consideration is not given to these areas, it would still allow for routine viability negotiation to strip out precisely the measures that make development acceptable in a protected landscape. Therefore, DM5 and any associated guidance should make explicit that in nationally protected landscapes foreseeable costs such as landscape mitigation, biodiversity net gain delivery, and sensitive design should normally be treated as part of the policy-compliant baseline rather than complicated items used to justify reduced obligations and the removal of any mitigations.

### **Question 26**

Policy DM5 should improve transparency and consistency by limiting when and how viability can be used to reduce policy requirements or necessary mitigations, and the requirement for supporting information to be publicly available is particularly important in small communities where trust in planning decisions can be fragile. There is a risk that repeated small reductions across several modest developments could cumulatively undermine the infrastructure and mitigation rural areas rely on, such as safe walking routes, drainage improvements, biodiversity enhancements, and traffic safety measures. Because development in rural parishes tends to be incremental rather than strategic, each contribution has a proportionally greater impact, and the loss of even minor obligations can have noticeable local consequences; review mechanisms should therefore be routinely required where contributions are reduced to ensure communities benefit if market conditions improve.

### **Question 27**

The process for modifying planning obligations after agreements are signed could be improved by strengthening clarity and transparency from the outset. This is to ensure any changes are tightly controlled and focused on evidence. Clearer requirements for the applicants to demonstrate genuine unforeseen change should help avoid unnecessary need for renegotiation and likely removal of conditions and or mitigations that would benefit the local community.

In protected National Landscapes, obligations often secure long-term environmental or significant landscape mitigation that is fundamental to community acceptance of the development. Therefore, it is imperative that any modifications should not weaken these safeguards without compelling justification. Parish councils should be notified of proposed changes and given visibility of the supporting evidence, as they often have detailed local knowledge of whether obligations remain necessary or effective. Parish Councils should also remain signatories on any S106 agreements and not be allowed to be sidelined, which would clearly removal the local input and voice on matters.

### **Question 28**

There is concern that options such as section 73 applications can sometimes be used to revisit agreed obligations indirectly after permission has been granted. This is especially problematic in smaller rural communities as previously outlined where even minor reductions in affordable housing or landscape or environmental mitigations can have significantly negative and lasting impacts. Improvements could include clearer guidance limiting renegotiation. Any proposed changes should only be allowed when genuinely unavoidable and not through retrospective planning to make changes when developers have not followed the agreed conditions within a planning decision. If reductions happen, new review methods should restore contributions or mitigations when viability improves during delivery or sale. Greater transparency and clear reporting of what the impact is as well as the ability for the community to comment and object to any proposed changes should be considered. Without such safeguards, repeated incremental renegotiation risks removing either small or major infrastructure, environmental mitigation, and affordable housing provision that are critical to maintaining balanced and sustainable rural communities within protected landscapes.

### **Question 30**

Policy DM7 does not provide sufficient clarity or reassurance in managing the relationship between planning decisions and other regulatory regimes. While recognising the importance of planning focusing on land-use, the policy appears to place significant reliance on the assumption that separate regulatory systems, such as those governing water supply, wastewater treatment, or building standards, will be expected to operate effectively regardless, without ensuring that there is statutory consultation or meaningful coordination with those bodies at the decision stage. In practice, planners are not specialists in these technical fields, and the absence of a clear requirement to seek input from relevant regulators risks decisions being made without the professional expertise needed to properly assess capacity, environmental implications, or infrastructure constraints.

From the perspective of smaller rural parishes within a National Landscape, this presents tangible risks. Local infrastructure limitations, particularly relating to water availability, sewerage capacity, surface water capacity and environmental sensitivity, are often material land-use considerations and cannot be assumed to be resolved through later regulatory processes or provision. A blanket assumption that services can be provided or that technical standards will be met undermines precautionary planning and may lead to permissions being granted for development that proves difficult or harmful to implement. The policy would be strengthened by requiring proportionate engagement with relevant regulatory bodies where their remit has clear land-use implications, ensuring planning decisions are informed by appropriate professional input rather than relying on procedural assumptions.

### **Question 31**

Whilst the policy goes some way to making an impact on intentional unauthorised development is an improvement, it is not strong enough to restore confidence in the robustness of the planning system. In smaller rural communities, the issue is not typically single major breaches but can be a pattern of smaller unauthorised works or changes introduced retrospectively, often followed by applications

seeking to regularise the situation. Where enforcement action is inconsistent or delayed, this creates a perception that compliance is optional and undermines community trust. A stronger policy position would make clear that intentionally unauthorised development should normally be refused at the outset and that retrospective applications should face a significantly higher threshold of justification.

This is particularly important within a National Landscape, where even a single dwelling or incremental change of land use can have disproportionate visual, environmental, or ecological impacts. Small scale breaches that might appear minor in urban contexts can materially alter landscape character or set precedents that encourage further encroachment. The policy should therefore provide clearer direction that intentional breaches attract meaningful consequences, including weight against future applications on the site, to ensure the planning system incentivises compliance rather than to concept of option to comply and negotiation with minimal planning enforcement.

### **Question 32**

Intentional unauthorised development can generate several specific harms in smaller rural communities that are not always considered. These include erosion of public confidence in the planning system, unfairness toward compliant applicants, and cumulative landscape harm arising from incremental changes that individually appear minor but collectively alter settlement form and environmental quality. Where enforcement action is not pursued or is delayed, retrospective planning becomes normalised and difficult to challenge, weakening the credibility of local and neighbourhood planning policies and creating tension within communities.

To mitigate these harms, stronger expectations around timely enforcement and clearer consequences for intentional breaches should be considered. This could include guidance that retrospective permissions should be exceptional, that deliberate non-compliance should be a material negative factor in decision-making, and that monitoring or enforcement resourcing is prioritised where protected landscapes are affected. Additional safeguards recognising the specific sensitivity of National Landscapes, where isolated dwellings or land-use changes can have significant visual and ecological effects, would also ensure that the policy supports both environmental protection and rebuilds public confidence in planning governance.

### **Question 34**

Policies within Chapter 4 should place stronger emphasis on safeguarding protected landscapes when development proposals are prepared and assessed, particularly where authorities face pressure to identify land for housing allocations. While improving efficiency and delivery is understandable, there must be clear recognition that National Landscapes are nationally important assets whose protection should not be diluted by procedural streamlining or housing supply pressures. Applicants should therefore be expected to demonstrate at an early stage that encroachment into protected landscapes has been avoided wherever possible and that alternative sites have been properly explored. In rural

parish contexts, infrastructure constraints need proper consideration. Many rural parishes have limited sewerage capacity and overstretched primary healthcare provision. Without addressing these issues upfront, additional or speculative development risks being given permission in locations that cannot sustainably support it.

For smaller rural parishes located within a National Landscape, even limited development can have significant and lasting impacts on visual character, biodiversity, tranquillity, and environmental quality. It is also very likely that there is limited infrastructure especially sewerage capacity and capacity in rural GPs; without clear allocation of land usage within plans it is very difficult to build in ability to meet additional needs outside of this. Protected land and landscapes should be safeguarded as a priority, and policies should make clear that development within or affecting these areas must meet a demonstrably higher threshold of justification. Robust assessment requirements and early scrutiny are essential to prevent incremental erosion through piecemeal applications, ensuring that national landscape designations remain meaningful and that ongoing protection of these landscapes is essential to ensure they are not compromised by short-term land supply pressures.

#### **Question 35**

Yes. However there also needs to be a definition on what an 'isolated' area is i.e. how far away from a settlement/hamlet etc.

#### **Question 36**

The Parish Council strongly disagrees with the proposed approach. It appears to create too many routes by which development may be permitted outside defined development boundaries without sufficient clarity on safeguards for protected landscapes. In areas within a National Landscape, settlement boundaries serve an important function in managing growth sustainably and protecting landscape character, yet the draft policies provide limited or no explicit guidance on the weight that should be given to conserving these nationally designated areas. The absence of a clearly defined and cross-referenced policy emphasis risks any of these needs always being weighted more heavily than protecting rural character and protected landscapes. In particular, the concept of allowing "limited infilling within groups of houses" is overly vague and open to interpretation, creating uncertainty and increasing the likelihood of incremental encroachment that cumulatively undermines landscape integrity.

There is also concern that broad allowances for agricultural or rural development could unintentionally facilitate future residential use through subsequent applications or changes of use. While supporting rural enterprise is important, the policy as drafted may create loopholes enabling dispersed development patterns that are difficult to reverse and often unsustainable in terms of access to services, infrastructure, and environmental impact. A more robust approach would provide clearer thresholds, tighter definitions, and stronger alignment with national landscape protection objectives,

ensuring that development outside boundaries remains genuinely exceptional rather than becoming an alternative pathway for unmanaged and ongoing expansion.

#### **Question 38**

S5 is an approach that introduces multiple options that are unclear in scope and definition, increasing the risk of incremental development creep in smaller rural settlements. Even small development can have disproportionate impacts on landscape character, settlement form, and infrastructure pressures, particularly within or adjacent to a National Landscape. Ambiguity in terminology creates inconsistent interpretation and weakens the effectiveness of development boundaries.

Clearer definitions and stronger safeguards are needed to prevent gradual encroachment. Without greater clarity and explicit recognition of the sensitivity of protected landscapes, the policy risks enabling unmanaged expansion that undermines spatial planning objectives and long-term environmental protection.

#### **Question 44**

While the policy strengthens expectations for considering current and future climate risks, it lacks sufficient practical detail on everyday adaptation measures that could be delivered through development design. In particular, there are some easy and cost effective methods for simple and effective surface water management solutions such as rainwater capture through water butts or the use of suitable permeable or porous surfacing materials. These measures can significantly reduce runoff, support water conservation, and improve resilience to heavier rainfall events, especially in smaller rural settlements where drainage infrastructure is often constrained. The policy should more explicitly encourage or require these types of measures as part of good design and layout considerations. Without this the policy remains high-level and aspirational rather than delivering tangible resilience benefits through everyday development proposals.

#### **Question 47**

Ensure that National Landscapes and National Parks are given a separate section and clear policies to ensure these habitat rich and biodiverse spaces are not lost. Climate change considerations matter little if policies allow the continued destruction of green spaces.

#### **Question 58**

A minimum expectation of 40% M4(2) provision is reasonable as a baseline, but local plans should retain flexibility to set higher or sometimes lower levels where demographic evidence indicates need. Accessible housing in rural areas contributes directly to community sustainability and social wellbeing, especially if the community has a high need for the M4(2) standards. Schemes should always reflect local and rural settlement form and landscape character rather than relying on standardised urban layouts. Affordable housing should be a mix and be truly affordable, minimising the shared ownership

offer which rarely supports those in rural areas and emphasis on homes for first time buyers. Any affordable housing should be part of a mix tenure development with houses 'pepper-potted' through to support community cohesion.

#### **Question 59**

Requiring authorities to identify sites or set policies for different housing groups is something that should be considered in a holistic approach. Mix developments rather than 'silo tenure' should be encouraged and within that a range of housing to suit all needs of those buying privately and through affordable schemes. Specific consideration should be given to identifying where specific groups would live better. For example putting housing for older residents outside of the development boundary isolates these residents as within rural areas the footpaths are either non-existent or unusable for those with lower mobility. There is also an emotional separation being placed outside the centre rather than being in the middle feeling fully engaged and part of the community.

#### **Question 60**

The requirement for a broader mix of tenures on sites of 150 homes or more has limited relevance for smaller rural parishes, where developments of this scale would generally be inappropriate in a protected landscape context. While the principle of tenure diversity is sound, the policy should recognise that rural delivery is more commonly achieved through small, locally responsive schemes rather than strategic-scale sites.

#### **Question 61**

Allocating a proportion of housing on small sites between 1 and 2.5 hectares could support SME builders and local housing delivery. However, this must be balanced against the characteristics of National Landscape settlements. Sites of this size can represent significant edge-of-settlement expansion and should only be supported where access, landscape impact, drainage, and infrastructure capacity have been carefully assessed and do not encroach or adversely affect protected landscapes. Smaller sites also impact rural communities as many smaller sites over time could add an additional 10/20% of housing putting pressure on existing infrastructure and services with little or no CiL contributions to make any meaningful contributions in delivering change where it is needed.

#### **Question 62**

The policy giving substantial weight to meeting housing needs should be refined to emphasise locally evidenced needs and capacity in rural protected landscapes. For small rural parishes meeting need is less about overall numbers and more about delivering genuinely affordable and locally appropriate homes without harming or encroaching onto the National Landscape. Any change for improving structures to allow for small scale affordable housing delivery to be delivered and managed by smaller rural housing associations should be strengthened.

#### **Question 63**

Including military affordable housing within the definition is unlikely to have direct relevance to our parish. Where such provision is proposed, it should be subject to the same considerations of landscape impact, infrastructure capacity, and integration with the existing settlement as any other development.

#### **Question 64**

Allowing flexibility in market home size to support affordable housing delivery raises concern in rural settings where larger, higher-value homes already dominate supply. Whilst there may be limited need for some additional housing considerations need to be given for local need within the immediate area. Lower cost market homes are also needed to help lower and middle income families and couples to move into accommodation that they can afford. With this there is a risk this approach will continue the imbalance in the housing stock and weakening long-term affordability. Alternative mechanisms that secure affordable provision without increasing overall dwelling scale would be preferable.

#### **Question 65**

The provision of social rented housing is important however, it essential that such provision is explicitly linked to local need through the use of local lettings policies. In smaller rural communities, particularly within protected landscapes, access to genuinely affordable housing is critical for local residents to access. Social rented homes should prioritise people with established connections to the local area so that residents can remain within their communities and continue to access family, employment, care, and informal support networks. Policy should therefore recognise the importance of enabling local authorities and housing providers to apply proportionate local connection criteria to ensure that social rented housing genuinely serves the communities where the housing is built.

#### **Question 67**

This proposed policy presents a significant risk of reducing or removing affordable housing provision in rural areas. Smaller rural settlements already face persistent challenges in delivering genuinely affordable homes. Any policy that allows applicants to make the choice risks weakening provision in locations where supply is limited and opportunities for replacement are rare. Affordable housing delivery in rural communities is often achieved through small schemes, meaning that the loss of even a small number of units can materially affect local access to affordable housing.

Rather than introducing flexibility that could reduce provision, policy should prioritise strengthening safeguards to ensure affordable housing is secured and retained for local communities. Any approach that increases the risk of erosion of rural affordable housing supply cannot be supported.

#### **Question 72**

The intention to encourage housing provision for older residents is positive as it helps people remain independent and connected to their communities. However, such development must be located within the centre of existing settlements rather than outside development boundaries. Proximity to shops, healthcare, public transport, and social support is essential. Developments on the outskirts particularly

in rural communities usually have insufficient footpath networks for residents with lower mobility and therefore risk isolation and increased car dependence. The policy should prioritise well-connected sites within established communities. This approach supports accessibility, avoids unsustainable expansion into protected landscapes, and ensures housing for older residents genuinely meets its intended purpose.

### **Question 73**

The intent of the policy is sound, but greater clarity is needed around what is meant by residents being able to access services easily and safely, particularly in rural communities. Accessibility cannot be judged solely on distance or assumed connectivity; it must reflect the reality of infrastructure. In many rural areas, routes are constrained by narrow roads, limited lighting, and a lack of continuous pavements, and so-called shared footpaths or informal walking routes do not provide safe or practical access for older residents, children, or those with mobility limitations.

The policy would be strengthened by defining accessibility in terms of genuinely usable and safe routes, including appropriate separation from traffic, suitable surfaces, and consideration of mobility needs. Clearer expectations would help ensure that development proposals are assessed against realistic rural conditions rather than just urban assumptions.

### **Question XX**

It is unclear what the direct overall improvements would be for this change. While the intention to improve clarity or flexibility may be positive, the practical implications for smaller rural communities are unclear, and changes that appear proportionate at a national scale can have unintended consequences in constrained rural areas where development opportunities are limited and infrastructure is fragile. Without clear safeguards particularly to protect the National Landscapes, there is a risk of incremental pressure on environmentally sensitive or poorly serviced locations, and before support could be given greater clarity is needed on how the proposal would operate in rural contexts, how impacts would be monitored, and what protections would ensure it does not undermine plan-led development or protected landscape objectives.

### **Question 77**

The Parish Council supports this proposal as a sensible approach, particularly in the South East where land values are exceptionally high and present a significant barrier to delivering affordable and community-beneficial development. Measures that recognise these market realities and seek to improve viability or delivery mechanisms are welcome, as they may help unlock sites that would otherwise remain undeveloped or fail to provide meaningful public benefit. However, it remains important that such flexibility does not come at the expense of environmental protections, infrastructure provision, or affordable housing commitments, especially in sensitive rural or National Landscape settings where the impacts of development are more pronounced.

**Question 79**

Policy HO12 has been drafted in a manner which the Parish Council cannot support. Criteria 2.b refers to “other personal circumstances” and is undefined making this requirement open to wide interpretation, creating uncertainty and the potential for inconsistent decision-making. Without clear parameters this wording could be used to justify development that would not otherwise be acceptable, particularly outside development boundaries or within sensitive rural and protected landscape settings. There is also concern about requiring provision for unknown or undefined need beyond the local area, which risks placing pressure on communities with limited infrastructure and environmental capacity; policy should instead focus on meeting clearly evidenced local needs in sustainable locations.

**Question 80**

In its current form, the policy appears impractical to implement and lacks sufficient clarity regarding how Local Planning Authorities would realistically enforce the proposed conditions. No clear mechanism is provided for monitoring compliance, assessing performance, or taking action in the event of breaches. This risks establishing policy expectations that cannot be delivered in practice. The concern is particularly acute for smaller Local Planning Authorities, many of which operate with constrained staffing and financial resources and are already under significant pressure in progressing enforcement cases. Without clearly defined procedures, appropriate funding support, and proportionate enforcement tools, the policy is unlikely to be applied consistently and may ultimately undermine confidence in the planning system if conditions are imposed but not effectively enforced.

**Question 82**

This policy does not provide sufficient detail or strength to ensure that very large sites are delivered in a timely manner. As drafted, it is brief and lacks clear mechanisms, triggers, or consequences that would meaningfully influence delivery rates or prevent delay. Larger strategic sites often take many years to build out, and without specific expectations around phasing, infrastructure provision, and monitoring, there is a risk that permissions will be secured but delivery will remain slow or uncertain. A more robust approach is needed, with clearer requirements for implementation timetables, transparency, and intervention where progress stalls, otherwise the policy is unlikely to have a practical effect in ensuring that large allocated sites come forward as intended.

**Question 87**

While it is vitally important to support and protect existing farmers and established rural businesses, there is increasing concern about new rural or commercial uses being introduced onto previously undeveloped land and then significantly intensifying the use of that land over time. Such changes can lead to substantial impacts from traffic generation, noise, lighting, structures, and activity levels that alter the character of the countryside and place pressure on local infrastructure. Within National Landscapes these impacts can be particularly harmful, as even modest intensification can erode landscape character, tranquillity, and environmental quality.

The policy should therefore distinguish more clearly between supporting existing rural enterprises and allowing entirely new businesses to establish on undeveloped rural land. Within National Landscapes, stronger safeguards are needed to ensure that new rural business proposals do not lead to incremental industrialisation or suburbanisation of sensitive landscapes. A clear provision should be included confirming that more permissive support for rural business development does not apply in the same way within designated landscapes, where conserving and enhancing natural beauty must remain the primary consideration.

#### **Question 96**

In principle this should be a positive policy, but it will only be effective if water and wastewater providers are made statutory consultees and clear safeguards are introduced. Development should not be permitted in water-sensitive locations where there is insufficient infrastructure capacity or where additional demand would place unacceptable strain on existing systems. In rural areas especially, infrastructure is often already constrained, and assumptions that upgrades will follow later are unrealistic. Planning conditions should therefore require that all necessary water supply and wastewater infrastructure is fully secured, funded by the development, and in place before any housing construction begins; without this, the policy risks allowing growth that outpaces essential services and harms environmentally sensitive areas.

#### **Question 114**

This policy appears heavily urban focused and does not adequately reflect the sensitivities of rural areas, particularly those within protected landscapes such as National Landscapes (AONBs). Applying density expectations without clear rural safeguards risks promoting development that is out of scale with village character, infrastructure capacity, and landscape setting. In these areas, density should be led by environmental capacity and local context rather than standardised national assumptions. National Landscape (AONB) units and local planning authorities should therefore be explicitly allowed to set maximum density levels to protect landscape character and ensure development remains appropriate to its setting; without this flexibility, the policy risks encouraging inappropriate intensification within nationally protected landscapes.

#### **Question 115**

Further guidance is needed on how this policy should apply within protected landscapes, including National Landscapes (AONBs). National policy should be explicit about the significant weight that must be given to conserving and enhancing these nationally important areas and should clearly state how this should be balanced against density or growth expectations. Without clearer direction there is a risk that general development policies will be applied without sufficient regard to landscape sensitivity. Stronger and more specific guidance would assist decision-makers and applicants in understanding that protecting designated landscapes must remain a primary consideration.

#### **Question 116, 117**

The Parish Council as a rural council does not consider that this policy provides sufficient guidance for rural areas or settlements within protected landscapes. Provisions such as encouraging the redevelopment of “under-utilised retail sites” may be appropriate in urban contexts but could unintentionally undermine the limited commercial facilities that remain in rural communities, where even small shops or services play a vital role in local sustainability. Similarly, allowing development within large residential curtilages, as referenced in part d iii, risks facilitating significant incremental expansion into the countryside, particularly in villages within National Landscapes where plot sizes are often generous. Without clearer safeguards and explicit weighting in favour of protecting rural character and countryside settings, the policy could enable development patterns that erode landscape quality and settlement form. Stronger recognition of rural character and protection of this and clearer direction on how these considerations should be prioritised and weighted in planning decisions is necessary.

#### **Question 118**

No, as the policy does not set out clear or measurable high design principles. Terms such as “sensitive redevelopment” are too vague to provide meaningful guidance for applicants or decision-makers and risk being interpreted inconsistently. In many areas the existing street scene may already be of poor quality, and simply responding to what is there will not necessarily result in improvement. New development should be required to enhance and raise the standard of the built environment rather than replicate or embed existing weaknesses. The policy would benefit from clearer minimum design expectations and stronger reference to measurable design quality standards to ensure that redevelopment delivers genuine enhancement rather than just change.

#### **Question 119**

This policy sets out broad rules that permit greater intensification, particularly on corner plots. Allowing such flexibility without specific safeguards risks dramatically altering the character of areas where corner plots face one another, potentially creating overbearing forms of development and disrupting established street patterns. The policy also fails to define appropriate height parameters or contextual limits, leaving significant ambiguity about scale and massing. Without clearer design criteria and controls, this approach could lead to inappropriate intensification that harms local character rather than enhancing it.

#### **Question 120**

The Parish Council strongly disagrees with proposal outlined in d iii, as it risks facilitating significant incremental expansion into the countryside. In villages within National Landscapes, isolated residential plots or those on the outskirts are often more generous in size allowing further development within these curtilages. This could lead to substantial intensification and gradual erosion of rural character. What may appear as minor or infill development in policy terms can in practice result in meaningful encroachment into open countryside and harmful changes to settlement form and landscape setting.

Without clearer safeguards and explicit weighting in favour of conserving rural character and protected landscapes, the policy could enable development patterns that cumulatively erode landscape quality and environmental value. Stronger protections and clearer limitations are needed to ensure that countryside and National Landscapes are not subject to incremental and unintended urbanisation through loosely defined intensification policies.

**Question 121**

The Parish Council disagrees with this proposal as the policy is vague and makes no clear distinction for rural areas or settlements within protected landscapes. A minimum expectation of 40 dwellings per hectare represents an extreme urbanisation of the countryside and is wholly unrepresentative of the rural character with typical rural densities often in the range of 10–20 dwellings per hectare, particularly within National Landscapes (AONBs). Applying such a benchmark without explicit rural exemptions or safeguards risks fundamentally altering village form, settlement pattern, and landscape setting. The policy should clearly recognise the environmental sensitivity and lower capacity of protected rural areas and allow substantially lower density expectations where necessary to conserve and enhance landscape character.

**Q122**

Minimum density requirements should not be applied rigidly in National Landscape areas, where settlement character, access constraints, and landscape sensitivity often necessitate lower-density forms. While efficient land use is important, density standards must allow local discretion where environmental or design considerations warrant variation. Otherwise there is a strong risk of ‘urbanising’ the countryside and these protected landscapes through inappropriate densification.

**Q122(b)**

Minimum density expectations could have unintended consequences for certain groups, including traveller communities or disabled residents, if they restrict delivery of culturally appropriate layouts or adequate space for accessibility needs. Flexibility should therefore be retained where justified by site context or user requirements.

**Q123**

Dwellings-per-hectare is a workable metric, but the definition of net developable area should recognise that green infrastructure, biodiversity buffers, and landscape mitigation are integral components of acceptable development in protected landscapes, not residual space outside the calculation.

**Q124**

The definition of a well-connected station has limited relevance locally but should reflect realistic access conditions rather than service frequency alone. In rural areas, safe walking or cycling routes and actual public transport links are more meaningful indicators of connectivity.

**Q125**

National density standards may be appropriate in clearly urban contexts such as town centres, but they should not be extended to protected landscapes where local character and environmental sensitivity are defining considerations.

**Q126–127**

Any density ranges around well-connected stations should remain discretionary where protected landscape or heritage constraints apply. Flexibility is essential to ensure policies do not override local environmental or settlement character considerations.

**Q128–129**

High-level guidance on residential extensions is helpful, but it should better acknowledge cumulative impacts in rural landscapes, including effects on dark skies, boundary vegetation, and traditional plot patterns. Even minor incremental changes can alter character over time in sensitive settings.

**Question 148**

We do not consider this policy to be sufficient as drafted due to the complete absence of explicit reference to protected landscapes. National Landscapes (AONBs) are nationally designated areas with a statutory purpose to conserve and enhance natural beauty, yet this importance is not clearly reflected within the policy framework. A specific reference should be included under section 1(d) to recognise the significance of these landscapes and to explain why development within them requires a heightened level of scrutiny and sensitivity.

In addition, there should be clear guidance directing how local policies, design guides, and codes must actively protect and reinforce landscape character within designated areas. Without explicit direction and weighting, there is a risk that general design principles will be applied without proper regard to the unique environmental and visual sensitivities of protected landscapes. Stronger and more specific policy wording is needed to ensure that conserving and enhancing these nationally important areas remains a primary consideration in design-led decision-making.

**Question 158**

The overall intention of the policy is good, particularly where it strengthens environmental protection and clarity in decision-making. However, greater emphasis is needed on how it will operate within protected landscapes such as National Landscapes (AONBs), where environmental sensitivity and statutory purposes require heightened consideration. Clearer reference to the significant weight that must be given to conserving and enhancing these areas would improve consistency and ensure nationally designated landscapes are not inadvertently weakened by broader development objectives.

**Question 159**

The effectiveness of the policy will depend heavily on how it is implemented in practice, particularly in rural areas with limited infrastructure and high environmental value. Additional guidance would be beneficial to clarify how competing objectives should be balanced, especially where development pressures intersect with landscape protection, biodiversity, and infrastructure constraints. Without clear direction, there is a risk of inconsistent interpretation that could undermine environmental safeguards.

#### **Question 160**

While the policy direction is broadly positive, further detail is needed to ensure it is workable and enforceable, particularly in rural and protected landscape contexts. Explicit guidance on weighting, monitoring, and practical application would assist Local Planning Authorities in making defensible decisions. Clearer recognition of the cumulative impacts of smaller developments in rural areas would also strengthen the policy and help ensure that long-term environmental quality and landscape character are properly safeguarded.

#### **Question 162**

The current policy does not sufficiently recognise the particular sensitivities of rural areas and protected landscapes. While the overarching objectives may be appropriate at a national level, there is limited clarity on how the policy should be applied in areas where environmental capacity, infrastructure provision, and landscape protection are significant constraints. In National Landscapes especially, there must be explicit confirmation that conserving and enhancing natural beauty carries significant weight in decision-making. Without clearer guidance on how this weighting should be applied, there is a risk of inconsistent interpretation and unintended harm to environmentally sensitive rural communities particularly those within protected landscapes.

#### **Question 179**

There are concerns about this policy, particularly in the context of National Landscapes (AONBs). Within our area of the High Weald, much of the agricultural land is classified as lower quality and has previously been used as an excuse to allow development within our area of AONB. The policy risks creating an unintended pathway for development on large areas of countryside simply because it does not meet higher agricultural land classifications. This could lead to gradual erosion of landscape character across protected areas. Specific reference should therefore be made to protected landscapes, regardless of whether land is identified within Local Nature Recovery Strategies, to ensure that designation status alone triggers a higher level of protection.

Paragraph 1(c) refers to “limiting the scale and extent of development” but provides no clear indication of what this means in practice. Without measurable parameters, such as density expectations, maximum dwellings per hectare, or clearer spatial limitations, this wording is open to interpretation and may conflict with other policies in the Framework that promote intensification and sustainable development. There are serious concerns about how much weight will actually be given to conserving

and enhancing protected landscapes when read alongside growth focused policies. Clearer guidance on weighting, safeguards against encroachment, and specific protections for National Landscapes are needed to avoid cumulative harm through piecemeal development particularly with the removal of paragraph 11(d) and the extensive options for development outside settlements outlined in section S5.

### **Question 181**

As a Parish Council located within a National Landscape (AONB), there is particular concern about the cumulative effect of the proposed national reforms and housing delivery pressures on protected rural areas. When strategic planning changes, strengthened national decision policies and housing supply requirements are considered together, there is a risk that rural land within designated landscapes becomes subject to increased pressure simply because authorities are required to demonstrate delivery. This places smaller parishes in a vulnerable position where the balance may shift toward short-term housing targets rather than long-term landscape stewardship.

Within an AONB, even modest-scale development can have a disproportionate impact on landscape character, tranquillity, biodiversity, and settlement pattern particularly in the Weald which is renowned for its medieval layout. Development pressure regularly does not meet local need but comes from wider unmet demand in surrounding urban areas. Without clear and robust safeguards, there is a danger that nationally protected landscapes are gradually eroded through incremental decisions justified by strategic housing requirements rather than genuine local sustainability.

National policy must therefore provide strongly weighted policies that conserving and enhancing the natural beauty of National Landscapes carries significant weight in both plan-making and decision-taking. Growth strategies should not default to rural protected areas simply because other locations are constrained. Protective wording is required to ensure that nationally designated landscapes are not placed under disproportionate development pressure as a consequence of broader structural reforms.

### **Question 182**

We do not consider that Policy N4 provides a sufficiently clear or robust basis for considering development proposals affecting Protected Landscapes. The change from “great weight” to “substantial weight” may be presented as drafting consistency, but in practice it risks diluting the long-established understanding that National Landscapes and National Parks should enjoy the highest status of protection in planning terms. Our Parish Council has seen development happen across the District within an AONB despite these spaces being afforded the highest protection. Clarity and strength of wording are critical in decision-making, and any weakening of emphasis creates uncertainty about the priority that should be given to conserving and enhancing these nationally designated areas.

The policy also fails to clearly explain how the statutory duty to “seek to further” the purposes of Protected Landscapes should be applied. Avoiding harm is not the same as actively conserving and enhancing, however nothing explicit on what this entails is described. The tests for major development must remain rigorous and clearly defined along with an actual definition of ‘major development within

a protected landscape. Developments being reviewed should have exceptional circumstances and public interest treated as two separate tests which must be met. References to mitigation and compensation where significant harm cannot be mitigated risk suggesting that harm to a Protected Landscape can be offset, which is inconsistent with their national importance and totally undermines any true protection.

Policy S5 allows significant development outside settlement boundaries in certain circumstances, and other policies across the new proposed NPPF give “significant weight” to housing delivery and economic growth which results in the risk of cumulative erosion for protection of these landscapes. The combined effect risks encouraging incremental expansion and urbanisation within or adjacent to Protected Landscapes. Without explicit confirmation that landscape protection takes precedence where conflict arises, Policy N4 does not provide sufficient clarity or strength to safeguard these nationally important areas.

### **Question 183**

While policy N6 is helpful in setting out a clearer hierarchy of internationally, nationally and locally designated biodiversity sites, it does not provide clarity on how these designations will be weighted in decision making, particularly when read alongside policies such as S5, minimum densities and development in residential curtilage that promote development delivery. In rural areas and within protected landscapes, many sites of high ecological value fall within locally designated categories or form part of wider ecological networks rather than benefiting from international or national status. Without explicit direction on the level of protection and the weight to be applied to these locally recognised sites, there is a risk that they will have limited practical protection when balanced against housing or infrastructure pressures.

The anticipated role of Local Nature Recovery Strategies is positive in principle, as mapping will assist with identification. However, identification alone does not guarantee protection, and timeframes need to be clear to ensure this is fully instated before the new NPPF starts. The State of Nature 2023 report highlights that the UK ‘is one of the most nature-depleted countries on earth.’ With such a stark statement it is imperative that these National Landscapes are truly protected, not just a tokenistic gesture. Clearer wording is needed to confirm that harm to locally designated sites, protected landscapes and irreplaceable habitats will be given significant weight and that development proposals affecting them will face a robust and precautionary approach. Without this clarity and weighting wider housing pressures, other policies will ensure that this policy will lack consistent strength in application.

**ENDS**