

**Planning for the homes we need**

**Question 1**

*Do you agree that we should reverse the December 2023 changes made to paragraph 61?*

Yes, the City Corporation agrees with this. The *aim* should be to meet an area's local housing need (LHN), precisely because this is an identified need.

**Question 2**

*Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?*

The City of London's housing target up to 2028/29 is set at a strategic regional level by the Mayor of London's London Plan. London is a unique region and has the most comprehensive level of strategic planning in the England. This means that the 'standard method' may not be the most appropriate method for calculating housing need at a regional level. The 'standard method' views each London borough's housing need in isolation, whereas it is an accepted approach within the London Plan to view London as a 'single housing market, with a series of complex and interlinked sub-markets' (London Plan para 4.1.2).

Removing reference to alternative approaches to calculating housing need may cause difficulties for strategic planning authorities, as it forces the use of a metric calibrated to a smaller scale. If references to alternative approaches are removed in general, there should be recognition that at a strategic scale the standard method may not be the most appropriate method. This should be considered with regard to the stated ambition to introduce a form of strategic planning.

The City Corporation understands that the GLA have assurances from MHCLG that the approach to London will remain consistent. The apportionment of London's overall target will follow the spatial strategy and capacity of individual authorities, rather than the divisions shown in the standard method. The City Corporation supports a continuation of the existing approach. It is important that the new standard method does not undermine this.

**Question 3**

*Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?*

Yes. This was always an arbitrary uplift with no robust justification.

**Question 4**

*Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?*

Yes, the City Corporation agrees with this deletion, and considers that the government should go further. Suburban intensification is a route towards greater housing delivery that does not increase the pressure for green belt release. There are parts of Greater London outside of the green belt that are suitable for residential development and the NPPF should be stronger in supporting the densification of these areas. These could be near transport hubs and train stations, town centres, or low density residential areas with parcels of underutilised land.

#### **Question 5**

*Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?*

Yes, we agree with the move away from authority wide design coding . Design codes aren't always necessary for every area; it would be more effective to direct energy and resources toward developing them where they can offer the most value to schemes. Design codes also have the potential to assist with the adaption of the historic built environment to modern sustainability and accessibility standards and so are not limited to the large scale regeneration sites and urban extensions referenced in paragraph 12 of the consultation document.

#### **Question 6**

*Do you agree that the presumption in favour of sustainable development should be amended as proposed?*

Yes. The extra support for locational and design considerations within the 'tilted balance' is particularly welcome.

There should be further clarity on what out of date means in areas with a Spatial Development Strategy. It is noted footnote 83 specifies the role of SDSs in respect of the transitional arrangements but it is not clear if this can be read through into paragraph 11.

#### **Question 7**

*Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?*

The City of London recognises that pro-supply measures are needed to boost housing supply and in this context the requirement for a 4YHLS when in the late stage of plan making is not appropriate. However,

the need to demonstrate a 5YHLS immediately after a Local Plan examination seems redundant. If the examination has confirmed that at least a 5YHLS exists, then this work should not need to be repeated.

### **Question 8**

*Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?*

Housing delivery fluctuates annually and therefore it is logical to allow past over supply to be considered within the calculation. It is conceivable for LPAs with smaller housing targets, such as the City Corporation, to deliver two years' worth of housing in one development. If past oversupply is not factored in, an LPA might be required to create 'theoretical housing' within an annual assessment when, in reality, that housing was consented in the previous year.

Furthermore, if this situation happens for consecutive years and is not factored in, the 5YHLS can become significantly out of sync with the overall housing target in the local plan. If there are several years of oversupply, and the 5YHLS target is not proportionately reduced, then the target will be overshoot. The 5YHLS needs to account for potential deviations from the trajectory planned for in the local plan. In a plan led system, the 5YHLS should support the delivery of the housing target over the long term, rather than as a stop gap measure to fuel speculative housing development.

It is presumed that the removal of the text in paragraph 77 of the NPPF would be accompanied by the removal of the relevant text within the Planning Practice Guidance, however, this is not clear. From comments made by MHCLG at events attended by the City Corporation it seems that the guidance text would remain. If this is the case, it is not clear what the deletion of paragraph 77 would achieve.

### **Question 9**

*Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?*

Yes. The overall aim to increase housing supply is supported. A 5% buffer is needed given the fluctuations in the housing market and unforeseen complications that arise when delivering housing sites.

### **Question 10**

*If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?*

Given the significant uplift in housing targets for most LPAs, the government should be aware that a 5% buffer could correspond to a very substantial number of additional sites over and above the sites identified to deliver the local housing need. As there is a step change in housing targets, some form of transitional arrangements may be necessary to prevent a 'cliff edge' when Local Plans become more

than 5 years old (and the target used in the 5YHLS reverts to Local Housing Need calculated via the standard method)

### **Question 11**

*Do you agree with the removal of policy on Annual Position Statements?*

No comment

### **Question 12**

*Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?*

Yes. The Square Mile relies heavily on the surrounding region to provide the services and infrastructure that allow it to function as one of the world's premier finance and business hubs. Effective strategic planning is often needed to deliver this infrastructure and the City Corporation welcomes the additional support afforded.

Strategic planning allows many planning issues (housing, industrial development, employment, and environmental protection) to be considered and dealt with at a more appropriate scale. The London Plan allows for the pan-London housing target to be distributed across the region based on local capacity, which in turn allows for a more ambitious target to be planned for. It allows for the most important green spaces or industrial land to be protected and enhanced, with a recognition that they serve areas beyond the LPA's boundaries. For regions that have clear economic, social or environmental geographies that are greater than LPA boundaries, strategic planning is valuable; the formal and binding power of a Spatial Development Strategy eclipses anything that could be achieved through a Duty to Co-operate.

### **Question 13**

*Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?*

The interpretation of the tests of soundness is primarily a matter for planning inspectors during a Local Plan examination. Therefore, the City Corporation suggests that any modifications to the tests of soundness should be located in the Inspectors guidance, rather than the NPPF.

The NPPF a general framework and if the tests are altered to better suit strategic scale plans, this could risk the tests feeling weighted towards a specific type of plan. Specific guidance to Inspectors on how to analyse strategic scale plans and proposals would be better.

**Question 14**

*Do you have any other suggestions relating to the proposals in this chapter?*

No comment

**A new standard method****Question 15**

*Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?*

Updating the baseline used in the standard method is necessary as it is currently 10 years out of date. Given the dwelling stock is updated every year, using this as a baseline would be an improvement on the current method.

**Question 16**

*Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?*

This is similar to the existing method and continues to be supported. Averaging the ratio over three years to smooth out fluctuations seems sensible.

**Question 17**

*Do you agree that affordability is given an appropriate weighting within the proposed standard method?*

With the removal of the urban uplift, the City Corporation recognises that another method is required to compensate for the areas that have the most demand for housing and concomitant affordability pressures. Strengthening the affordability ratio more evenly distributes housing requirements across the country, with a closer correlation to actual affordability pressures. In the context of increasing housing supply, the City Corporation supports the additional weight given to affordability.

**Question 18**

*Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?*

No comment

## **Question 19**

*Do you have any additional comments on the proposed method for assessing housing needs?*

Given the Square Mile's unique status as an international finance and business hub, housing comprises a relatively small proportion of land uses. The changes to the standard method only increases the annual Local Housing Need for the City of London by 1, and so it would not have a material impact.

However, the overall result of the changes to the standard method – increased housing targets on average and more accurate correlation with real affordability pressure – is supported by the City Corporation. To operate effectively as a business hub, the City of London relies on a functioning housing market within London and the South East, and more broadly across the UK as a whole. The changes to the standard method to increase housing supply are supported in this context.

Notwithstanding, it is recognised that the proposed changes would substantially increase the Local Housing Need figure for most LPAs. This step change in figures will require LPAs to plan in a materially different way, with many more sites identified for housing at densities that may previously have been rejected. Monetary and professional support should be given to LPAs that have to undertake substantial redrafting of their local plans.

## **Brownfield, Grey Belt and the Green Belt**

### **Question 20**

*Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?*

Prioritising the redevelopment of brownfield land is supported and it is acknowledged that this approach is woven throughout the NPPF. Therefore, the City Corporation is not convinced that the introduction of this extra phrase at 124c is necessary, especially as 'substantial weight' is already given to using brownfield land. It is also not clear what 'brownfield passports' are. Further details are required on this before the City Corporation can comment.

The idea that all brownfield land is acceptable in principle for development of essentially any kind ('homes and other identified needs') is problematic. There is no recognition of other policy designations this may cut across. In the City, the City Corporation directs housing development to identified residential areas, and therefore maintains the primary office function of the City. The City Corporation is concerned that a blanket 'acceptable in principle' provision would undermine this spatial strategy by establishing a principle that housing development is acceptable on all brownfield sites.

Additionally, brownfield land can sometimes be important for biodiversity for example if the brownfield site has developed into supporting priority habitats (e.g. open mosaic habitat on previously developed land ) and species.) Again a blanket 'acceptable in principle' provision risks cutting across other

important characteristics of the land by removing the ability for a planning judgement to take place. There are always several competing factors that need to be considered before a site is deemed suitable, which is why the language of 'substantial weight' is useful as it guides a decision taker, as opposed to an acceptable in principle approach which removes power from the decision taker.

Conversely, if the phrase is understood to mean that on the 'suitable brownfield land' identified earlier in the sentence, development is 'acceptable in principle', this amounts to little more than a repetition of the overarching philosophy that sustainable development is desirable. If the acceptable in principle provision only applies to brownfield land that is 'suitable' (eg sustainably located - not covered by conflicting designations and/or appropriate for the specific type of development proposed), then it is redundant as the proposed development is already in a 'suitable' location.

### **Question 21**

*Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?*

Previously Developed Land in the green belt can potentially be close to designated conservation areas (SAC, SSSI, RAMSAR etc) which have buffer zones advised by statutory bodies. The City Corporation supports this change on the basis that the designated conservation areas and their buffer zones remain protected. It should be clear that while new development on PDL in the green belt may not be 'inappropriate' for the purposes of green belt policy, it still may not be desirable due to the proximity to sensitive environmental/ecological areas.

### **Question 22**

*Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?*

No comment.

### **Question 23**

*Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?*

Yes. The City Corporation supports the definition as a starting point but more guidance is required both in how judgements are made (see question 25), and in the factors to be considered.

Designating land as grey belt, opens the possibility for development, both through the local plan but crucially also through the development management process. The suitability for development of grey belt land is not solely based on its contribution to green belt purposes. Whether it is sustainably located and how much it contributes to ecological outcomes are also important. It could be that areas of green and grey belt have been identified within Local Nature Recovery Strategies (LNRS) to restore habitat and species. Further clarity will be required to ensure designated sites and areas identified within the LNRS are protected and excluded from the grey belt.

It is recommended that the definition of grey belt in the glossary is amended to exclude land which has been identified within the LNRS as locations where it would contribute to achieving LNRS priorities. This could potentially also be accommodated by updating footnote 7 of the NPPF to recognise that land identified in a LNRS should be protected. Furthermore, it is recommended that additional guidance is given on 'sustainable locations', to enable LPAs to make more precise holistic judgements on whether a site is suitable to be grey belt and therefore available for development.

Identification of grey belt must be undertaken with a strategic approach that looks at assessing the land parcels and their position within the landscape, their connection to statutory and non-statutory designated sites and LNRS, and their multifunctional benefits with regards to ecosystem services, biodiversity and climate change and resilience. Decisions must be made at a landscape scale and must be integrated into the NPPF.

#### **Question 24**

*Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?*

There is a tension between the green belt purposes in the NPPF and wider ecological or environmental targets. Land could perform poorly against the green belt purposes but still be important for biodiversity or as buffer zones to sensitive sites. It may not be that green belt land is degraded to make it eligible for grey belt release, but rather that low value grey belt land is valuable for other reasons and should not be released. In the current drafting there is no recognition of these environmental or ecological factors when designating grey belt.

As an example, the Conservators of Epping Forrest (as part of the City of London Corporation) are concerned that land qualifying as grey belt could be identified or released within a short distance of the Epping Forest SAC and SSSI. At present this land use could have little to impact on the Forest and potentially provide an important buffer from adjacent development, despite potentially its lack of contribution to the five greenbelt purposes. The alteration to housing, both in its urbanising effect and recreational impact upon the adjacent/nearby green space would have impact upon the qualifying features and integrity of the habitat conservation of that site.

#### **Question 25**

*Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?*

Yes. The City Corporation suggests that the PPG should include a discussion of what the government expects a 'limited contribution' to mean.

Is it a balancing act whereby a negative contribution to one purpose balances the positive contribution made to another purpose, and therefore a holistic judgement must be made? Or is it a checklist whereby the LPA/applicant must prove a limited contribution to each purpose individually in order to qualify?



### **Question 26**

*Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?*

The City Corporation does not think there is sufficient guidance. The proposed definition of the grey belt is a useful starting point, but further guidance is required to aid practitioners when assessing land against the five green belt principles. As well as clarifying the process outlined in response to question 25 (whether it is a holistic judgement, or whether strong performance against a single green belt purpose disqualifies land from grey belt designation), guidance should also be provided as to how grey belt land interacts with Metropolitan Open Land (MOL) as designated in the London Plan. MOL is qualitatively different from green belt land, as shown by the criteria in London Plan Policy G5 part B, and it should not be available for grey belt development.

### **Question 27**

*Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?*

England is widely considered to be one of the most nature-depleted countries in the world following historic and ongoing declines. Government has made legally binding commitments to end these declines and for nature to recover. The review, identification and/or release of grey belt should be factored into a wider land use strategy that works for nature and biodiversity and must not contradict or conflict the Local Nature Recovery Strategies (LNRS) for that responsible authority. Each local nature recovery strategy will agree priorities for nature recovery and propose actions in the locations where it would make a particular contribution to achieving those priorities. It could be that areas of the green and grey belt fall within the LNRS and have been identified to restore habitat and species and improve the areas ecological status. Further clarity will be required to ensure designated sites and areas identified within the LNRS are protected and excluded from the grey belt.

It is recommended that the definition of grey belt in the glossary is amended to include land which has not been identified within the LNRS as locations where it would contribute to achieving LNRS priorities. This could potentially also be accommodated by updating footnote 7 of the NPPF to recognise that land identified in a LNRS should be protected.

### **Question 28**

*Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?*

The City Corporation appreciates the government is reluctant to tightly define a 'sustainable location' as this will vary on a case by case basis, however, if the development management route in paragraph 152 continues to be supported, some form of guidance will be necessary to support a plan led system.

The guidance could point towards the local plan process as the primary way of defining a 'sustainable location' and state that sites rejected from a local plan are unlikely to be sustainable. There could also be general guidance for, or the standardisation of, the type of sustainability the government is focused on: is it transport related and reducing the need for private vehicles, is it environmental and biodiversity focused, is it economic or social? Given paragraph 152 concerns grey belt development it seems that transport and environmental sustainability is the most important, but this should be clarified.

It is also noted that the criteria for a 'sustainable location' varies dependant on the type of development proposed. What is sustainable for a housing development may not be sustainable for a logistics or employment hub. The continued growth of the Square Mile depends on excellent transport links for commuters, and therefore, as the UK's premier employment hub, locational sustainability from the City of London's perspective is primarily related to public transport links.

The City Corporation has seen through recent local plans how some green belt can be released through decision making associated with Local Plans and more particularly 'Masterplan' site development which is more akin to 'Garden Town' planning. Such release has the capacity to encompass schools, housing, local facilities, good public transport / active travel links and associated greenspace with both nature and recreational facilities. These large-scale developments are much more likely to be sustainable and there is potential for guidance to indicate this.

It should also be clarified that given the nature of most of the green belt (open countryside, not near transport links, potential ecological or biodiversity value), many sites are unlikely to be 'sustainably located'. The City Corporation is concerned that green belt release has the potential for cross-cutting impacts on nature conservation and should only be pursued within a wider brownfield first context. Green belt release should also be planned for at a strategic level to allow for a holistic consideration of the competing uses of land and the feasibility of meeting needs across the entire plan area. Key issues to be considered include the green belt purposes, environmental or ecological factors (including protected sites), provision of housing to support economic growth and other employment and industrial uses.

#### **Question 29**

*Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?*

No comment

#### **Question 30**

*Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?*

The City Corporation is concerned about the new paragraph 152 and the introduction of a development management route to grey belt development. This makes isolated and speculative development on grey belt land possible and undermines an integrated and plan led approach to development. The review,

identification and release of grey belt should be factored into a wider land use strategy that works for nature and biodiversity and must not contradict or conflict the Local Nature Recovery Strategies (LNRS) for that responsible authority. There is also the potential for fragmented islands of development outside of local or major conurbations which will result increased reliance on private car ownership for the majority or all journeys.

The City Corporation notes that green belt release has the potential for cross-cutting impacts on nature conservation and should only be pursued within a wider brownfield first context. Green belt release should also be planned for at a strategic level to allow for a holistic consideration of the competing uses of land and the feasibility of meeting needs across the entire plan area. Key issues to be considered include the green belt purposes, environmental or ecological factors (including protected sites), provision of housing to support economic growth and other employment and industrial uses.

It is recognised that paragraph 152 requires any grey belt development consented outside of the local plan process to be in 'sustainable locations', however this is a vague judgement call and does not offer LPAs a strong argument to refuse development. All applicants will argue their development is 'sustainably located' and in the face of increased housing targets and the more frequent application of the 'tilted balance' an unsustainable location may not outweigh other planning benefits.

This has an impact on recognised ecological sites (SSSI, SAC, NNR, RAMSAR etc), as currently drafted, plots adjacent to these areas could be defined as grey belt and therefore granted permission via paragraph 152. However, it has wider implications for the plan led system as a whole and has the potential to undermine the spatial strategy put forward in the local plan. To counter this, the City Corporation would like to see a standardisation of the criteria for sustainability, so consistent decisions can be made, and decision makers know which types of sustainability the government is most concerned about in the green belt (transport, employment, environmental, cultural or heritage, industrial/logistics).

### **Question 31**

*Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?*

No comment

### **Question 32**

*Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?*

No comment.

### **Question 33**

*Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?*

No comment

#### **Question 34**

*Do you agree with our proposed approach to the affordable housing tenure mix?*

Yes – empowering local authorities to decide on the affordable tenure mix for land released from the green belt is welcome. The appropriate tenure mix will vary based on location and it is not appropriate for the government to prescribe a tenure mix at the national scale.

#### **Question 35**

*Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?*

Yes the 50% target is subject to viability and therefore this would factor in the land value at the determination stage. There is no need to authorities to set a lower target at the plan making stage, for this to then be viability tested on a site by site basis at application stage.

#### **Question 36**

*Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?*

In general, the City Corporation agrees with the reasoning that if green/grey belt land is developed, this must include improvements to nature and good public access to open and natural spaces. The City Corporation owns and manages a portfolio of important open spaces in the Green Belt such as Epping Forest, Hampstead Heath, Ashted Common, Burnham Beeches and Coulsdon Common. Some of these spaces are subject to additional environmental designations such as a Sites of Special Scientific Interest (SSSI) or Sites of Importance for Nature Conservation (SINCs).

The new 'golden rules' introduced at paragraph 155 go some way to ensuring green belt development would deliver benefits for nature and public access. However, the City Corporation considers that part c is overly focused on public access to natural spaces. It is not clear that the provision would guarantee improvements to nature in its pure sense, as protected by SSSI or SINC designations. Additionally, increased public access to natural spaces can have adverse impacts on the ecosystem, as shown by the recreational pressures on Epping Forest.

The City Corporation would like to see part c redrafted to explicitly recognise that improvements to nature are different, and can compete with, providing public access to green spaces. In some case they can be complimentary, but as drafted, the City Corporation thinks that the requirement to provide additional access to green spaces may cause adverse impacts to the natural environment. Any off-site accessible public green space delivered via the golden rules must not be land subject to nature

conservation designations (either statutory or non-statutory designated sites) or fall within the Local Nature Recovery Strategy's habitat maps.

Alternatively, a part D could be added that requires demonstrable improvements to the nearby natural environment over and above minimum policy levels. This could link with Local Nature Recovery Strategies, Biodiversity Net Gain, and/or Urban Greening.

Additionally, it is noted the golden rules only apply to major development. Minor development can also increase recreational pressure on open spaces, especially sensitive ecological sites. The City Corporation would like to see the green space golden rule (para 155 part c) extended to all development, ideally with the provision that minor development must provide green space on site. This is because minor development is unlikely to be of a scale or scope, or be financially viable enough, to materially benefit nearby open spaces and so must be able to wash its own face. This in contrast to large scale, 'new towns' or 'garden towns' that can bring benefits to the wider landscape on a strategic and theoretically more sustainable manner.

#### **Question 37**

*Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?*

#### **Question 38**

*How and at what level should Government set benchmark land values?*

#### **Question 39**

*To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?*

#### **Question 40**

*It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?*

#### **Question 41**

*Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?*

#### **Question 42**

*Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?*

**Question 43**

*Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?*

**Question 44**

*Do you have any comments on the proposed wording for the NPPF (Annex 4)?*

**Question 45**

*Do you have any comments on the proposed approach set out in paragraphs 31 and 32?*

**Question 46**

*Do you have any other suggestions relating to the proposals in this chapter?*

**Delivering affordable well-designed homes and places****Question 47**

*Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?*

Yes. The London Plan already takes this approach, and it is considered useful when planning for housing.

**Question 48**

*Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?*

Yes. Increasing the powers local leaders have to determine their own affordable housing provision is welcomed, especially where affordable home ownership is shown to not be viable. The City of London SHMA supplement (2024) shows that the price of newbuild housing in the City Of London makes it unlikely that First Homes and Shared Ownership properties can be delivered within the £90,000 per annum income cap in London.

**Question 49**

*Do you agree with removing the minimum 25% First Homes requirement?*

Yes. First Homes are not well suited to a central London context due to the high house prices. And requirement for a £90,000 income cap. This is particularly acute in the City, where it is extremely unlikely that a new build home is under the £420,000 threshold, even when a discount is applied. The City of London SHMA supplement (2024) shows that affordable to own products (such as First Homes and Shared Ownership) have no role to play in meeting needs.

### **Question 50**

*Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?*

No comment

### **Question 51**

*Do you agree with introducing a policy to promote developments that have a mix of tenures and types?*

In principle yes, however due to the unique character of the City, new, large mixed tenure housing only sites are unlikely to be appropriate. The City has started to see applications for new housing tenures such as Purpose Built Student Accommodation (PBSA) and Built to Rent (BtR) which can work well when combined with ground floor town centre uses.

Paragraph 69 could reference how a mix of uses also provide benefits, especially when non-traditional housing tenures (student housing, built to rent) are combined with town center uses.

The City Corporation also notes that a mixture of tenures and types works well on large scale developments, urban extensions, and new towns. It is less likely to be successful on small plots or developments that comprise a single building, that for management and logistics purposes are a single tenure.

Single tenures sites can often work well when that tenure is 100% social or affordable rent, and the City Corporation delivers a number of these types of developments on sites in central and outer London. This is alluded to in the answer to question 52 (below).

The government should note the tension between questions 51 and 52. Single tenure and multi tenures sites can both work well in different circumstances.

### **Question 52**

*What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?*

The City Corporation has delivered and managed a number of 100% social/affordable rent developments on land it owns around London. One way to encourage these types of developments is to have a policy environment that is supportive of single tenure developments, especially when the tenure is social or affordable rent.

Introducing requirements for 'mixed communities' can sometimes make developments too complex to deliver, especially on small plots in inner city locations.

### **Question 53**

*What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?*

No comment

**Question 54**

*What measures should we consider to better support and increase rural affordable housing?*

No comment

**Question 55**

*Do you agree with the changes proposed to paragraph 63 of the existing NPPF?*

**Question 56**

*Do you agree with these changes? (strengthening provisions for community led development)*

**Question 57**

*Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?*

**Question 58**

*Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?*

**Question 59**

*Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?*

Yes, as the terms beauty and beautiful are not defined in the NPPF, and there is no guidance as to how beauty differs from 'good' or 'high-quality' design. The National Design Guide and National Model Design Code clearly set out the criteria for good design and allow officers to make consistent judgements based on a set of robust principles. The concept of 'beauty' has no such equivalent guidance and therefore, in practice, is a nebulous term that is not useful when assessing planning applications, conservation areas, or writing policy.

If beauty were to be retained within the NPPF, guidance should be produced that details how the term is to be interpreted, especially with regard to established good design principles.

**Question 60**

*Do you agree with proposed changes to policy for upwards extensions?*

We agree with the deletions/alterations to the mansards' text, but we think that the word 'height' should be retained – *"where the development would be consistent with the prevailing **height** and form of neighbouring properties and the overall street scene, is well- designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers."*



**Suggested addition to the text:** In addition, the quality of the accommodation created should be taken into consideration by the LPAs before granting permission.

#### **Question 61**

*Do you have any other suggestions relating to the proposals in this chapter?*

As it stands, the NPPF treats the setting of heritage assets as being on a par with that of the assets themselves. While setting is of course important, changes to setting typically do not have the same impact as direct impacts to the fabric of an asset. Matters of setting are often highly subjective, and setting itself is an intangible, ever-changing and difficult to define concept.

The City Corporation has found that questions of setting make the delivery of growth challenging. The mix of new and old that characterises the Square Mile should be developed further to allow the City to grow in response to modern requirements, rather than the character of half the city (i.e. the old) stifling the development of the other half (i.e. the new).

Setting is of course important, but the City Corporation thinks a rebalance is required. A change to the NPPF could be made that removes mention of setting from paragraph 206 of the NPPF, with a new paragraph that sets out that matters of setting should be treated as a matter of ‘balanced judgement’, in the same way that paragraph 209 sets out the approach to considering applications that could affect the significance of non-designated heritage assets.

### **Building infrastructure to grow the economy**

#### **Question 62**

*Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?*

Large new pieces of infrastructure such as laboratories, gigafactories, digital infrastructure, and logistics hubs are unlikely to be appropriate in the City. However, the business function of the City is supported by some of the infrastructure targeted, such as data centres and logistics hubs, and therefore support for the proactive planning of these facilities is welcome.

As a business cluster of international importance, the City is constantly modernising and is a significant contributor to the national economy. However, the services offered by the City may not be fully captured by the use of the word ‘industries’ in part C of paragraph 87. While it is broadly drafted, it could be made clearer within part c that ‘industries of local, regional or national importance’ includes services, such as finance, insurance, law, and professional services. The benefits of agglomeration these services receive from clusters of high density development should be acknowledged.

#### **Question 63**

*Are there other sectors you think need particular support via these changes? What are they and why?*

Service sector professions such as finance, insurance, law, and professional services receive substantial benefits from agglomeration in high density environments. These services form the foundation of the City's business community, contribute significantly to the UK's economy, and require specific types of development to function most effectively. Beyond concentrating in high density environments, the City has recently seen a step change towards 'best in class' office space. These sectors now look for spaces that meet the highest environmental and sustainability standards, accommodate contemporary work patterns, and provide additional amenities.

At part C of paragraph 87, 'expansion and modernisation' of industries should more explicitly recognise the needs of the service sector in contrast to 'industry'. This should start with a recognition of the benefits of agglomeration, and then highlight the new patterns of working and sustainability credentials that are now looked for.

**Question 64**

*Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?*

No comment

**Question 65**

*If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?*

No comment

**Question 66**

*Do you have any other suggestions relating to the proposals in this chapter?*

No comment

**Delivering community needs**

**Question 67**

*Do you agree with the changes proposed to paragraph 100 of the existing NPPF?*

Yes, we agree with these proposed changes.

**Question 68**

*Do you agree with the changes proposed to paragraph 99 of the existing NPPF?*

Yes, we agree with the proposed changes. The workforce of the City is supported by both good quality, early years places, and a consistent flow of new employees, from post-16 education and university.

It is noted that there are different delivery models for the different age categories, as early years places are usually privately provided, compared to mostly state funded primary and secondary schools.

#### **Question 69**

*Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?*

Yes. The City Corporation has policies and targets that are designed to increase the proportion of sustainable transport modes. The proposed changes are in line with the City Corporation's already established transport strategy and the shift to a vision led approach is fully supported.

#### **Question 70**

*How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?*

Despite the current national policy context, development plans are not creating a healthy food environment. More needs to be done in national planning policy to ensure that people have access to healthy, affordable food where they live. There needs to be clearer NPPF recommendations/statements regarding healthy food environments.

The Office for Health Improvement and Disparities (OHID) outlines a number of suggestions to create a healthier food environment such as:

- ensure shops and markets that sell a diverse food offer are easy to reach by walking, cycling or public transport
- ensure development avoids over-concentration of hot food takeaways in existing town centres or high streets,
- and restrict their proximity to schools or other facilities for children and young people and families.

Further suggestions are: to more explicitly include public health teams in the formulation of plans the decision taking on planning applications; limit the amount of hot food takeaways near schools; recognise the public health benefits of food production in allotments, public, and community gardens; and further emphasise active travel and 15 minute cities from a public health perspective.

#### **Question 71**

*Do you have any other suggestions relating to the proposals in this chapter?*

Paragraph 131 should be amended to include reference to public health teams. " ....Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective

engagement between applicants, communities, local planning authorities and public health teams throughout the process."

### **Supporting green energy and the environment**

#### **Question 72**

*Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?*

No comment

#### **Question 73**

*Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?*

Agree. This should include energy storage technologies.

#### **Question 74**

*Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?*

No comment

#### **Question 75**

*Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?*

No comment

#### **Question 76**

*Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?*

No comment

#### **Question 77**

*If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?*

No comment

#### **Question 78**

*In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?*

The City Corporation has developed carbon optioneering guidance (<https://www.cityoflondon.gov.uk/assets/Services-Environment/carbon-options-guidance-planning-advice-note.pdf>) that establishes a robust methodology through which applicants can explore different options and their impacts on Whole Lifecycle Carbon (WLC) emissions. Through a consistent methodology the City Corporation can effectively judge applications, and this enables planning officers to argue for better WLC outcomes.

Decision makers are already trying to consider climate change mitigation and adaptation more holistically in their decisions, however, the NPPF does not provide an appropriate policy framework. To ensure more certainty for development, the government needs to introduce the requirement to minimise whole life-cycle carbon emissions and waste from development, through whole life-cycle carbon assessments (including optioneering) and circular economy strategies for major and strategic development proposals and the need to balance planning benefits against criteria or priorities set out by the government. Technical methodologies and tools to calculate carbon costs are advancing quickly in the industry, however, the government needs to provide guidance as to how social, economic and environmental sustainability should be weighed.

Climate change adaptation should be addressed more holistically, to include the whole range of climate risks such as urban heat island effect, overheating of buildings, water resource efficiency and biodiversity.

#### **Question 79**

*What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?*

Technologies and tools are advancing quickly, and their use to support decisions could be increased over time, starting with requiring:

1. Reporting, perhaps against the forthcoming UK net zero building standard
2. Creating a local benchmark, and encourage developments to comply with this, or justify when they cannot
3. Creating carbon targets for building types, require development to comply with them, and introduce a form of offsetting or mitigating

It is important to provide guidance on how carbon impacts are weighed against other planning benefits.

#### **Question 80**

*Are any changes needed to policy for managing flood risk to improve its effectiveness?*

Schedule 3 of the Flood and Water Management Act 2010 should be implemented. This would enable a more rigorous approach to the management of surface water flooding, which is a significant risk for urban areas.

Statutory space should be created within the planning framework to put the Thames Estuary 2100 Plan on a statutory footing, and enable future regional scale plans for managing sea level change to also have a statutory footing.

**Question 81**

*Do you have any other comments on actions that can be taken through planning to address climate change?*

No comment

**Question 82**

*Do you agree with removal of this text from the footnote?*

No comment

**Question 83**

*Are there other ways in which we can ensure that development supports and does not compromise food production?*

No comment

**Question 84**

*Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?*

No comment

**Question 85**

*Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?*

No comment

**Question 86**

*Do you have any other suggestions relating to the proposals in this chapter?*

No comment

## **Changes to local plan intervention criteria**

### **Question 87**

*Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?*

Yes, although the existing criteria are already fairly broad. The inclusion of all development needs as opposed to just housing is sensible, as while housing is often the primary development need this is not always the case.

### **Question 88**

*Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?*

The City Corporation considers that the criteria are a useful tool that give clarity to LPAs. Section 27 of the PCPA 2004 is very vague and therefore the criteria are needed to give clarity ('.. failing to do anything that it is necessary for them to do...'). While the criteria could revised, they should not be withdrawn.

## **Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects**

### **Question 89**

*Do you agree with the proposal to increase householder application fees to meet cost recovery?*

No comment.

### **Question 90**

*If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.*

*If Yes, please explain in the text box what you consider an appropriate fee increase would be.*

No comment

### **Question 91**

*If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?*

Yes

No – it should be higher than £528

No – it should be lower than £528

No - there should be no fee increase

Don't know

*If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.*

No comment

## **Question 92**

*Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.*

The City Corporation processes a high volume of extremely significant, large scale developments that have considerable application fees. The City Corporation uses Planning Performance Agreements (PPAs) to supplement the application fee income which allows it to offer pre-application services. These services are essential given the scale of development in the City and the sensitivities that come with this. Therefore, the City Corporation supports increasing the fee for the largest (and most complex) major applications, as well as increasing the fee for s73 applications.

It is agreed the S73 fee should align with the new S73b fee. S73 applications can often involve significant work – pre-application engagement, detailed technical analysis, consultation, and debate at committee – the current fee of £293 does not even cover the administration involved with these applications.

S96a applications can often also involve significant work and much like S73 applications, the application fee does not cover the cost of dealing with them. The fees for S96a applications on major development should be increased.

The current fee to discharge a condition is £145. Some conditions are simply matters that can be quickly checked by a planning officer and then discharged, and therefore £145 may be adequate (although even in this case it may not meet the cost recovery level. In other cases, a condition can involve complex analysis, with internal and/or external consultees, and the potential for meetings with the applicant to resolve difficulties. In these cases, £145 is clearly not adequate.

Major developments of the scale the City habitually processes often have a substantial number of conditions and it is likely some of these will involve complex discussions. A flat fee of £145 does not cover the costs. PPAs can be used to mitigate this risk, however, an applicant has no obligation to enter into a PPA, and often once the permission is secured applicants have less pressure to meet deadlines (for example option agreements on land are often tied to securing planning permission.)

The simplest way to solve the problem of complex conditions on large scale development is to introduce a new fee category of 'condition discharge for major applications'. This would ensure that those applications that are likely to have simple conditions are charged a lower fee, while major applications



have a higher fee to help manage costs where a select number of conditions on a permission require a significant amount of resource.

### **Question 93**

*Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.*

Listed Building Consent can take significant officer time as well as significant costs for advertising in the press and therefore there should be a charge for these consents. The City Corporation is aware that fees are not currently charged for these applications as owners cannot opt out of listed building designations, however, in the Square Mile there are many listed buildings owned or managed large companies, rather than individuals.

Fees for Listed Building Consent could vary depending on whether they are for residential or commercial premises, if they accompany major applications, or if the work constitutes major development. This could be tailored to capture major development for commercial purposes, while excluding minor householder development most often carried out by single individuals.

### **Question 94**

*Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?*

*Please give your reasons in the text box below.*

Yes. The widespread use of PPA agreements in London means that LPAs do, *de facto*, set their own fees. Given the pressure major developers are under to secure planning permissions and the minor cost of a PPA relative to total build costs, LPAs are often in a strong position to negotiate PPAs. These agreements include the pre-application process, determination, and sometimes the discharge of conditions. Depending on the agreement reached, when the application is submitted the standard planning application fee is sometimes then paid on top of the PPA fee.

There is scope to formalise this process further, perhaps by providing a default PPA template, or advice on standard PPA costs or terms. The planning advisory service does already provide a PPA template, but this could be further endorsed by the government.

Given that there is informal acceptance of LPAs setting their own fees via PPA, and the endorsement of this approach by the development industry (as it allows LPA to guarantee an efficient service), there is a suitable context for the introduction of local varying fees.

### **Question 95**

*What would be your preferred model for localisation of planning fees?*

*Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.*

*Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.*

*Neither*

*Don't Know*

*Please give your reasons in the text box below.*

Local variation is preferred. Full localisation places too much of a burden on LPAs and would likely lead to the duplication of work. Neighbouring LPAs would have to undertake similar work which would likely result in similar outcomes and similar fee structures.

Local variation gives certainty to the users of the planning system, by guarantying fees will be roughly equal across the country, but also gives scope to LPAs where appropriate to vary their fees. It also allows for LPAs to vary select fees only, for example condition discharge or specific types of major developments. This means that LPAs could focus on the types of application they see the most often and devise the most appropriate fee, without having to calibrate fees for applications they see relatively few of.

For example, in the City Corporation receives regular Listed Building Consent for commercial developments, major applications that require significant whole life carbon and sustainability assessment, and tall buildings that require micro climate assessment.

#### **Question 96**

*Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?*

*If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?*

In recent years an increasing number of specialisms have been required to adequately assess planning applications. This is a result of the proliferation of policy goals the planning system is seen to contribute to (sustainability, circular economy and whole life carbon; heritage, design, and design coding; ecology and biodiversity net gain; digital planning).

Funding should be provided to allow LPAs to resource these highly specialized roles, either through the increase of planning fees, or through additional devolution of funding to local or regional levels. In recognition of the cross cutting nature of planning services, funding from other sources should also be considered (eg money for climate adaption and resilience)

#### **Question 97**

*What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?*

No comment

**Question 98**

*Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?*

Full cost recovery is appropriate.

**Question 99**

*If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.*

No comment.

**Question 100**

*What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?*

No comment.

**Question 101**

*Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.*

No comment.

**Question 102**

*Do you have any other suggestions relating to the proposals in this chapter?*

No comment.

**The future of planning policy and plan making****Question 103**

*Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?*

Yes. The City Corporation submitted its new Local Plan (City Plan 2040) to the Planning Inspectorate on Thursday 29<sup>th</sup> August 2024 and agrees that the plan should be examined under the existing NPPF. It is

noted that contrary to paragraph 4 of this part of the consultation, the planning system is not singularly focused on the delivery of housing. The transitional arrangements should be more general, or holistic, rather than taking the housing target as the only relevant factor.

Clear and definitive information on the new plan making system and National Development Management Policies needs to be shared with LPAs as soon as possible.

**Question 104**

*Do you agree with the proposed transitional arrangements?*

Yes

**Question 105**

*Do you have any other suggestions relating to the proposals in this chapter?*

No comment

The City of London Corporation supports the implementation of the LURA's digital reforms, as well as embedding common data standards and the use of digital platforms. It further supports the production of digital local plans, and it further supports the initiative of national policies being in a format which enabled the integration thereof, particularly National Development Management Policies, in a digital way.

It will be critical in the development of these digital approaches that the digital publication of national policies provides clear versioning, including date of publication and any superseding policy. Web-based national policies should allow for Local Planning Authorities to embed elements thereof into their own Digital Local Plans, as required. This data therefore needs to be accessed both in a way to allow the Local Planning Authority to access, extract, and embed most recent versions of a policy, as well as policies that were in place at a specific moment in time. Clear documentation should be created in terms of how to access, use and, and embed these web-based policies. Should National Development Management Policies have any relevant geospatial attribution these should be made available through [planning.data.gov.uk](http://planning.data.gov.uk), including relevant

**Question 106**

*Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?*

Overall, the City Corporation sees significant opportunities to improve the inclusivity of the Framework. We would be very interested to know how the published draft was reviewed by relevant user groups, including disabled people, and what the accompanying EqIA said about this. Please see below for detailed comments on these matters:

- The Public Sector Equality Duty is quite clear about the duty to eliminate unlawful discrimination, advance equality of opportunity between people who do/don't share a protected characteristic and foster/encourage good relations between those who do/don't share protected characteristics. I have not identified much at all about **advancing** equality of opportunity, particularly in respect of disability, nor how these policies will **foster/encourage** good relations between people who do/don't share protected characteristics
- The document talks about 'people with disabilities'. Whilst this is the language of the 2010 Equality Act, the language around disability has changed significantly since then and the government's own guidance on [Inclusive language](#) says that 'disabled people' should be used in preference to 'people with disabilities'. Suggest changing all references to 'people with disabilities' to 'disabled people' and include explanatory footnote with reference to the Act
- The glossary on p.77 includes the following sentence under 'people with disabilities' :
  - **These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs'.**

This part-list appears to fail to meet the PSED because it:

- excludes any reference to D/deaf people
- uses language that is significantly out-of-date and is not favoured by relevant groups e.g. 'ambulatory difficulties' instead of 'mobility impairments' or 'people with blindness' instead of 'blind and partially sighted people' or 'people with autism' instead of 'autistic people'
- perpetuates a discourse of inadequacy e.g. ambulatory and learning '**difficulties**'
- perpetuates a discourse of dependency e.g. 'mental health **needs**'
- p.80 glossary definition of 'Transport statement' has no reference to 'wheeling' or other inclusive transport
- Comments on particular paragraphs:
  - 94(b) suggest revise from 'safe and accessible' to 'safe, inclusive and accessible'
  - 109(a) suggest revise to add 'including for disabled people' to end of first sentence
  - 114 (b) suggest redraft with reference to the above
  - 1149 e) suggest add provision for accessible charging

- 132(f) add 'without disabling barriers' after the word 'accessible'

155( c) insert 'inclusive and' before accessible