



# NPPF CONSULTATION RESPONSE,

## MARCH 2026

### INTRODUCTION

The Community Land Trust Network is the official charity supporting Community Land Trusts (CLTs) in England and Wales. We are a membership body and represent 315 CLTs with over 2,200 affordable homes and other assets, and which have plans to deliver 7,000 more homes and community assets.

The key government policies that community-led development can assist with include:

- **Increasing social house building.** Three quarters of CLT homes built, and in the pipeline, are let for social or affordable rent, and are protected from the Right to Buy and Right to Shared Ownership. CLTs have been adept at providing additional supply in rural areas and on smaller urban sites overlooked by other providers; winning community support in sensitive locations such as the Green Belt and National Parks; and increasing the proportion of social rent homes on larger schemes initiated by others.
- **Building community wealth.** Community-led development gives local communities new tools to play a part in our national renewal. They can build assets, but also agency, capability and wealth. CLTs are overrepresented in the most deprived parts of each region of England. One in four have developed other infrastructure alongside housing including community centres, workspace and renewable energy generation.
- **Diversifying the housebuilding industry and improving build-out.** The potential for community-led development has been recognised by ministers, by the Radix Housing Commission chaired by Kate Barker, and in recent years by the Bacon Review and the Building Better Building Beautiful Commission. A more diverse and competitive industry, with a greater focus on quality, will be essential to build 1.5 million homes in this Parliament.

## RESPONSES TO CONSULTATION QUESTIONS

**12) Do you agree with the approach to initiating plan-making in PM7? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree**

Please see answer to question 14.

**13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

Please see answer to question 14.

**14) Do you agree with the approach to identifying land for development in PM9? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

PM6(1)d states that plan-makers should “Engage positively with communities and other key stakeholders, at appropriate points during their preparation and using a range of methods, so that relevant issues are identified and addressed as early as possible during the plan-making process”.

We suggest that the government could connect this with its emerging approach to neighbourhood governance, through the English Devolution and Community Empowerment Bill, to enhance and streamline community input. In particular, this could strengthen the role of the planning system in meeting the need for community facilities and other community priorities such as affordable housing and workspace, and it would support the role of community-led organisations in developing or being partners in the development of this infrastructure.

So:

PM7(1)a could include points at which the neighbourhood governance bodies within the geographic area of the plan will be engaged. Those points could include...

PM8(1) obtaining baseline information on neighbourhood-level needs, particularly on matters such as community facilities and affordable housing.

PM9(2)a inviting neighbourhood governance bodies to propose sites, and PM9(2)c to propose specific local priorities that could be met, including community facilities (which footnote 16 does not explicitly mention, “infrastructure” being unlikely to be interpreted as including community facilities)

PM10(1) could include neighbourhood governance bodies where those neighbourhoods cross the boundaries of more than one plan-making authority.

This could be made explicit in the NPPF, or in guidance documents. For example, the draft guidance on stage 1, identifying sites<sup>1</sup> also suggests issuing a call for sites to parish and town councils, neighbourhood planning forums, local residents and the wider public, but this is not framed as an opportunity to identify needs and propose ways to meet them with potential sites; there is no guidance on engaging the community and considering neighbourhood needs such as community facilities in stages 2 and 3 (assessing and identifying sites), and nothing in setting out how those community proposals were evaluated in recording decisions at stage 4.

The process could also explicitly mention the possibility of allocating sites for community-led development. To our knowledge this has been done once, to date, in a neighbourhood plan which allocated a site outside of the village envelope and specified that it should be taken forward as community-led development<sup>2</sup>. This assuaged local concern about a sensitive site. It doesn't specify the developer, but sets down the principle that anybody developing it should meet the definition of a community-led developer, or be partnering with one. Community-led developers have also been included in s106 agreements, taking on stewardship of important neighbourhood assets. We think that allocating sites with a presumption that they are community-led developments could strengthen local engagement and trust in the planning system, for

---

1

<https://www.gov.uk/guidance/identifying-sites-for-local-plans-stage-1#who-to-target-with-a-call-for-sites>

2

<https://eastcamb.gov.uk/planning-and-building-control/planning-policy-and-guidance/neighbourhood-planning/neighbourhood-7>

example, where there are sites with local sensitivities, or where there is a well established community-led organisation in the neighbourhood that would be ideally placed to co-develop and steward assets.

The government could go further with the English Devolution and Community Empowerment Bill, enabling community organisations to exercise the Community Right to Buy on any sites allocated through this process. This would arguably be a more effective way of achieving the aims of the ACV/CRTB mechanisms that would be a more strategic and planned approach to building community ownership of key assets to further their local social, economic and environmental interests.

As a side note, we would also suggest that the NPPF definition of community facilities could be strengthened with reference to use classes. We have heard experiences of applications defining these widely and sometimes inappropriately. We would suggest that, in the main, community facilities would be those fitting within the use classes F1 and F2.

**18) Do you agree with policy PM13 on setting local standards, including the proposal to commence s.43 of the Deregulation Act 2015? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

We would suggest that PM13(1) includes community facilities. This might include quantitative requirements for facilities and standards for them (a common issue is, for example, poor quality community centres being built and missing basic requirements like storage space and kitchen facilities).

**22) Do you agree with the policy DM2 on information requirements for planning applications? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree**

We strongly agree with reducing unnecessary requirements.

We surveyed our members two years ago and found that the average cost of planning applications for their projects (with a median size of 15 homes) had risen to over £10,000 per home, possibly as high as £15,000. Much of this is due to the growth of

information requirements and the consultants required to produce information on such a wide range of topics.

Our members strongly support high standards, and routinely place affordability and the environment as their top two priorities. But we often hear exasperated comments from CLTs and their advisers about communities being asked to spend tens or even hundreds of thousands of pounds on work to survey and protect a tree or hedge or deal with nutrient run-off, putting at risk vital social homes, while they are surrounded by thousands of acres of intensively managed existing land uses and industrial-scale pollution.

We strongly support more matters being dealt with strategically by Local Plans (and the NPPF and building regulations etc), leading to clear rules and requirements that applications can meet without requiring expensive surveys, studies and design work. We would urge that further guidance makes clear how information requirements for medium and minor development can be minimised.

**25) Do you agree that policy DM5 would prevent unnecessary negotiation of developer contributions, whilst also providing sufficient flexibility for development to proceed? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

We support the principle, and in particular taking the statement from the NPPG that the price paid for land should not be a reason for submitting a non-compliant application and making this clear in the development management policy in the NPPF.

**29) Do you agree with the approach for planning conditions and obligations set out in policy DM6, especially the use of model conditions and obligations? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

We would support measures to reduce the cost and length of negotiations over s106 agreements. We would propose that the government endorse a suite of model s106 agreements covering a range of circumstances, including separate model documents for rural exception sites and community-led exception sites.

Some practitioners in our sector have sought to get buy-in from local planning authorities to a template s106 agreement for CLT-housing association partnerships, usually on rural/community-led exception sites. Adopting this, or an equivalent that equally addressed these circumstances, nationally could introduce more consistency and reduce cost and delay.

**48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

The list of different groups in HO1(2) doesn't mention community-led development.

We appreciate that there is a risk that this list becomes overly long. However, there is clear evidence of demand for this which is not being provided by the planning system currently. The government has supported community-led approaches to development elsewhere — for example making it a priority in the Social and Affordable Homes Programme – and it is a part of the ministerial priority for market diversification. The need to meeting demand for these models was reflected in the the current NPPF in paragraph 73(b). We would therefore suggest community-led development be added to the list, encouraging planning authorities to take into account an assessment of the need for this.

It may be argued that community-led development is not a specific housing need group, but rather a mechanism for meeting the needs of those groups noted in HO1(2). But while many community-led developments will tick off some of the needs mentioned, there are others not well captured by it. For example, the need (or demand) for people to live together in a community such as a co-operative or cohousing community; the ambition of many communities to ensure that affordable and other rented homes are owned and controlled locally, or by their tenants. Just as self and custom build is identified in (j), which might be said to simply be a means to meet the needs identified in the preceding nine points (as well as general market housing). We think adding community-led development would provide further hooks to encourage planning authorities to cater to a wider unmet demand for diversified forms of housing.

We would also note – as there is no question specifically addressing the definition of community-led development – that we would not support a weakening of the definition, as proposed by some other housing sector bodies. In particular, we oppose suggestions

that organisations that are not owned and controlled by residents, but are charitable and paternalistic in nature, be defined as community-led. They are led by community-minded, or community-centred, organisations, but not by communities themselves. We are very supportive of the full range of forms of affordable housing provision, including housing associations, almshouses and other charities, but think the current definition provides important and helpful clarity to planners and applicants about what “community-led” means.

**49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

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

We think planning authorities would benefit from clear guidance on how to assess the need for community-led development, and self and custom build. On the latter we support representations made by NaCSBA about the lack of consistency between authorities, and the tendency for some to abuse self and custom build registers (who are often policed with excessive fees) to misinterpret need for self and custom build. The position for community-led development is worse, with little existing practice in considering or engaging with communities to understand the appetite for these approaches. We set out in response to earlier questions a structured process by which this need could be assessed, which doesn't need legislation or significant changes to the NPPF text and could be reflected in guidance.

We would also suggest that the NPPF should specify that needs should be assessed at appropriate geographic scales, so that neighbourhood and parish-level needs are adequately assessed. Evidence of need at this level will support policies and decision making for the kinds of schemes community-led developers typically promote, many of which have a strong emphasis on localised need at a more granular level than the whole authority.

**55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.**

We would propose that HO4(1)a reference community facilities.

We also propose that HO4(2)c reference community-led development as another type of specific group whose needs might be met, noting that these needs may relate to the housing mix (the thrust of this paragraph) but also community facilities and other needs. There are examples of CLTs, cohousing communities and cooperatives being incorporated into large-scale residential and mixed-use development, and in each case those needs and opportunities were identified as land was being disposed, developers procured, or s106 agreements were being negotiated. It would be better practice for such opportunities to be identified in Local Plan allocations, drawing on the processes we propose above in response to questions 12, 13 and 14.

We note that in a letter to our CEO, dated 6th January (reference MC2025/28017) the Housing Minister confirmed that, in relation to new towns, "I remain of the view that community-led housing and community-led stewardship have an important role in delivering high quality places through our New Towns programme". We have discussed with him how this principle could equally apply to all large-scale residential development, and suggest this change to the NPPF could open up significant opportunities for market diversification.

We would also again note that the current NPPF, in paragraph 73(b), requires local planning authorities to "seek opportunities, through policies and decisions, to support small sites to come forward for community-led development", but that currently there is no equivalent requirement or encouragement in the new draft NPPF, either in HO4 or HO5. This should be reintroduced, along with references to large sites, and to assessing need as mentioned in response to question 48.

**56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

We are pleased to see the definition broadened, and understand that this definition will now cover around 91% of rural settlements with a population of 3,000 or fewer, and so

will be able to seek affordable housing contributions from minor development. Minor and medium-sized development is the mainstay of these communities, so this approach will increase the supply of rural affordable housing in a plan-led way.

**59) Do you agree the proposals to support the needs of different groups, through requiring authorities to identify sites or set requirements for parts of allocated sites are proportionate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

As with question 55, we propose that community-led developers be added to the list of needs for specific types of housing (and mixed-use development) that can be met with sites, or setting requirements for parts of allocated sites.

**67) Do you agree that applicants should have discretion to deliver social and affordable housing requirements via cash payments in lieu of on-site delivery on medium sites? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**68) What risks and benefits would you expect this policy to have? Please explain your answer. The government is particularly interested in views on the potential impact on SME housing delivery, overall housing delivery, land values, build out rates, overall social and affordable housing delivery, and Registered Providers (including SME providers).**

Currently the vast majority of community-led development takes place on medium sites, and in almost every case these are mixed-tenure developments with considerable emphasis on the affordability of the homes. We have three concerns with this proposed addition.

First, there are a considerable number of community-led developments in which CLTs and others are purchasing homes off developers on medium sites, enshrined in s106 agreements. This opportunity would be considerably reduced. The impact of this would be most keenly felt in places where most development is either minor development or on medium sites, particularly in market towns, villages, and urban neighbourhoods with few or no opportunities for large-scale development.

Second, we are concerned that cash payments in lieu of on-site delivery may inflate land value expectations. It will be important that the policy requires an equivalent cash value to be provided for off-site provision for the same mix of tenures and types of homes. It may be more cost effective to provide the same number of homes as part of a larger development, meaning the developer of the medium site can provide a smaller commuted sum than the cost of building on-site. This would then mean either a higher profit margin to the developer or a higher price paid to the landowner.

Third, in rural areas there is a risk that 'nearby' is interpreted as another parish or urban centre at a considerable distance from the community where the development is taking place. In rural communities it is rare for medium-sized sites to come forward, and when they do it would not help that community to have affordable housing provided at considerable distance away. This should be reflected in the wording or guidance, for example to take a 'cascade' approach in which priority is given to on-site provision, and then to off-site provision within the community in which the money is raised (which might for example support a rural exception site in the community), and only then to support affordable housing elsewhere if both those options are exhausted.

If the provision of homes on site is genuinely a barrier, we would argue that policy HO8(1)b provides sufficient grounds to robustly make that case.

We would also note that one problem for developers is the erosion, over recent years, of Registered Providers interested in taking on allocations of affordable homes on medium sites. In our view there are three general reasons for this, each with a better prescription than weakening planning policy:

- 1) The general financial challenges faced by RPs due to inflation, fire safety, consumer standards, sales values, etc. These are cyclical or one-off factors that other government policy aims to ease.
- 2) The trend, driven by RPs and the Regulator of Social Housing, towards mergers, meaning the loss of smaller locally-based providers and a more streamlined approach focused on larger-scale development. The government should do more to incentivise RPs to take on smaller allocations, and support the growth of smaller providers – including in the community-led housing sector – to backfill gaps left by merged RPs.
- 3) Problems of quality and communication between developers and RPs, which apply as much or possibly more to SMEs as to national housebuilders, leading to a lack of appetite for homes by RPs and community-led providers. We have heard numerous reports from CLTs, for example, of discussions with developers building to a quality that they deem to be too low, where an early discussion

might lead the developer to acquire land and then plan and build something that is both financially viable and of interest to the CLT (and other providers).

We would also urge that the government again reviews the ability for affordable housing grant to be used on market sites in areas with significant viability pressures, and where there is a significant and unmet need. We recognise the risk of inflating land value expectations by signalling that policy-compliant development might attract grant. But particularly at the present time we are seeing many schemes falter or fail because it simply isn't viable, especially in low market areas with significant housing affordability pressures such as parts of Cornwall.

**Q72 Do you agree the with the criteria set out regarding the locations of specialist housing for older people? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.**

Quite a few community-led developments aim to enable older people to rightsize and/or remain in their communities, in some cases (especially with cohousing) within a supportive community and with access to community facilities. We would suggest adding to HO9(1)(a)(i) "... including through on-site provision where applicable; or where the homes will allow residents to remain in their communities and able to benefit from the continuing informally provided support and care."

**75) Do you agree the proposals provide adequate additional support for rural exception sites? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Policy HO10 in conjunction with the glossary does provide a clearer guidance on RES and will help bring consistency and greater take up of this route for CLH groups in rural areas. However, the take up of rural exception sites could be considerably strengthened by the following steps.

Regarding the rural exception site policy, we call for the government to amend the Town and Country Planning (Permission in Principle) Order 2017 to include an exception site Permission in Principle (PiP) that requires the applicant to state the location, number of dwellings and proposed tenure mix. Or to enable PiPs to state these in circumstances such as an exception site. This would enable wider use of PiP for exception sites,

enabling applicants like CLTs to establish the principle at an early stage and at low cost, and reducing the planning risk for the remaining work to obtain a full consent. Planning risk is a significant barrier for CLTs and enablers accessing pre-development finance, so this could unlock more finance for community-led development on exception sites.

We are aware of at least two cases where planning authorities considered PiP applications. One was refused, and enabled the CLT to test the principle of a challenging site at just 5% of the cost of a full application. A second is at an earlier stage. In both, officers gave weight to the number and tenure of dwellings, in spite of the fact that these would need to be secured later through the Technical Consent Stage and s106 agreement. So it is possible, but is not clearly supported by national policy.

We think HO10 could be clearer by splitting out into sub-paragraphs the different types of exception site development and their requirements. Currently the distinction between RES and CLES is unclear, in particular the circumstances in which a site would be suitable but “which would not qualify as a rural exception site”.

When we originally proposed this policy, leading to its introduction in 2023, we envisaged it as a means by which community-led developers could bring forward development that might be mixed-use, or of a larger scale than a rural exception site, or with a more balanced housing mix. All three (mixed-use, scale, tenure mix) are how the East Cambridgeshire Local Plan policy and SPD have been used to permit – for example – a 75 home scheme with 40% affordable housing, a new village green, woodland walk and GP surgery. Forms of CLD like cohousing often seek to develop a mixed tenure community with a significant portion of market housing, and amenities like a common house and shared gardens. These examples illustrate the ambitions of many communities across England, which go beyond the types of needs traditionally met by rural exception sites.

The government reflected the point about scale in the amendment, in the 2024 version, with the footnote enabling Local Plans to raise the size cap for these exception sites. This has been applied now to all types of exception sites, which we don't think is right as we are not aware of any demand for RES sites to be larger than the current size cap. It has never reflected the point about other land uses, though it was acknowledged in the Government's response to the previous consultation in December 2023, in which it stated that in the context of this policy *'we recognise that the development may include other supporting land uses'*. A further distinction was indicated in that December 2023 response, suggesting that the policy was introduced to *'address the concerns of respondents who felt that it should be more straightforward for community groups to bring*

*forward affordable housing in urban areas'*, but with the changes to the presumption in favour of sustainable development within settlements that is now more of a moot point.

The only clear difference we can discern, in the draft NPPF, is that the glossary specifies rural exception sites should “address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection”, and this isn't applied to community-led exception sites. Is it implied that it should? Applicants and planning authorities must guess. It is also an incredibly limited difference, and may be an incorrect interpretation on our part. Planners and applicants are left with no clarity.

On the size cap, we also have evidence of inconsistency as to whether “1 hectare/5%” is interpreted as “whichever is larger” or “whichever is smaller”. We have seen three confidential pre-apps for CLEs which we can share with officials, two of which interpret it as “larger” and one “smaller”. There is further ambiguity where there are other supporting land uses - is it the entire area in the application, or just the developed area, or just the housing? For example a CLT scheme in Stretham, East Cambridgeshire, which was assessed under the Local Plan's CLES policy, had a total site area of 5.62ha but most of the land was for a new village green and publicly accessible woodland walk, and the housing only represented 2.7% of the existing household population. Should this be permitted or refused under the national policy? The draft NPPF is ambiguous. We would argue it should be permitted, because the application is not substantially developing the land with housing beyond the 1ha/5% threshold, and the other land uses turn agricultural land into publicly accessible open space. We have many other examples of CLTs similarly developing homes plus orchards, allotments, gardens and other amenities of the sort recognised in policy GB(f)(vi) as appropriate for these kinds of circumstances. The current NPPF acts as a constraint on this kind of development.

We therefore propose splitting HO10 to cover the different types of exception sites and to clarify their differences. For community led exception sites, the definition would state:

“x. Sites which comprise community-led development which would not qualify as a rural exception site, but which include one or more types of affordable housing as defined in the glossary of this Framework **and which may include other supporting land uses**”

“x. Be no larger than 1 hectare in size, or exceed 5% of the size of the existing settlement, **whichever is larger, unless specific provision to exceed these limits is made in the development plan;**”

The text could then incorporate 2c into a new 1a that specifically related to rural exception sites. This would clarify that this criterion, are already in the glossary definition of rural exception sites, applies to rural exception sites but not to community-led exception sites

**76) Do you agree with proposals to remove First Homes exception sites as a discrete form of exception site? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

Yes. We don't think the First Homes exception site policy serves any purpose that cannot be achieved with the other affordable housing and exception site policies, which can deliver this and other forms of evidenced affordable housing need in a community.

**77) Do you agree proposals for a benchmark land value for rural exception sites will help to bring forward more rural affordable homes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) If so, which approach and value as set out in the narrative for policy HO10 of the consultation document is the most beneficial for government to set out?**

We welcome these proposals. In our experience, landowners - encouraged by agents - are prone to exploiting a perceived ambiguity in current policy regarding the inclusion of market housing in rural exception sites. It would avoid delays and difficulties securing sites because of 'hope value', ensure the land price means the scheme can viably deliver a RES policy compliant affordable housing scheme, and that the scheme meets the value for money criteria for Homes England grant funding.

We have previously proposed that local planning authorities set a Benchmark Land Value for exception sites, and that guidance could indicate a starting point of £10,000 per plot, or up to five times agricultural value or Existing Use Value, whichever is higher. This would provide flexibility for planning authorities to use this in a way that is responsive to variations in local housing and land markets.

**Q136 Do you agree policies GB6 and GB7 set out appropriate tests for considering development on Green Belt land? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

GB7(1)d references rural exception sites, and GB7(1)f(iv) references Community Right to Build Orders and Neighbourhood Development Order.

We would suggest that community-led development and/or community-led exception sites are referenced in this policy in either or both of those places. As such development comes from the local community it is similar in nature to CRBOs and NDOs. As it meets local community needs, including affordable housing but also (as we note in response to question 75) non-housing needs such as community facilities, it complements and adds to the possibility of a rural exception site.

Inclusion of community-led development in the policy would support a rules-based approach and give clarity and policy tools to communities in the Green Belt bringing forward development to meet their local needs.

**158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

We support everything in the current policy, and are pleased to see community facilities and opportunities to support social interaction included. However, the policy is missing an opportunity to also reflect the strong evidence base for social and economic determinants of health, in particular to do with community life and social connections, which go beyond the physical assets set out in spatial strategies and site allocations.

For example, a Public Health England guide to community-centred approaches for health and wellbeing published in 2015 stated that 'community life, social connections and having a voice in local decisions are all factors that underpin good health'. It defines

confident and connected communities in terms of three core concepts - equity, voice and control, and social connectedness<sup>3</sup>.

The Quality of Life Framework referenced by, among others, the LGA also includes 'a sense of control' as one of its six overriding themes<sup>4</sup>, but in the Quality of Life Foundation's evaluations of new communities this is an area that consistently scores poorly, with people feeling just as powerless as in wider society. This matches research by We're Right Here which found that three-quarters of people say they feel they have 'not very much' or 'no control' over decisions that affect their neighbourhood or local community. This evidence suggests that the planning system is having a negative impact on public health.

But there are opportunities to explicitly address this in the NPPF. We set out, in response to questions 12-14, how the plan-making process could more clearly provide opportunities for equity and voice.

Insofar as the NPPF promotes empowered forms of development such as self and custom build housing, and community-led development, it can also further provide opportunities for equity, voice, control and social connectedness in planning and development.

There is strong evidence that community-led development approaches contribute to health in this way. A literature review by UWE in 2019 found that community-led housing can support healthy ageing, social inclusion, improved physical health, tackling multiple disadvantages and meeting additional support needs<sup>5</sup>. A study commissioned by the ministry and published in 2021 found that community-led housing strengthens social connections and social cohesion, and reduces feelings of isolation and loneliness<sup>6</sup>. This is both by the design of homes and buildings; by the tendency to provide shared facilities such as gardens and common houses; by the social relations created within the groups themselves and through volunteering; and the sense of agency, control, voice and influence they have in the community organisation that designs, owns, manages, stewards the assets.

---

3

[https://assets.publishing.service.gov.uk/media/5c2f65d3e5274a6599225de9/A\\_guide\\_to\\_community-centred\\_approaches\\_for\\_health\\_and\\_wellbeing\\_full\\_report.pdf](https://assets.publishing.service.gov.uk/media/5c2f65d3e5274a6599225de9/A_guide_to_community-centred_approaches_for_health_and_wellbeing_full_report.pdf)

<sup>4</sup> <https://www.qolf.org/framework/>

5

<https://www.youngfoundation.org/institute-for-community-studies/repository/community-led-housing-and-health-a-comprehensive-literature-review/>

<sup>6</sup> <https://www.gov.uk/government/publications/community-led-housing-and-loneliness>

The NPPF could therefore promote community-led approaches being woven into approaches to planning and development, so that we build not only homes but healthy, connected, confident communities. Mainstream examples include the recent provision by Homes England of a site for TOWN to develop cohousing in Northstowe, Cambridgeshire; the role of Kennett CLT as a co-designer of the masterplan, development partner, and ultimately asset owner in Kennett Garden Village, East Cambridgeshire; and the allocation of 58 homes to a new BME housing co-operative in the regeneration of St Ann's hospital in Haringey.

Policy HC1 could weave some of this into the existing text. For example to add to HC1(1)e, "...social interaction through their spatial strategy and land allocations, including through... walking and cycling, ~~and~~ promoting mixed-use developments, providing opportunities for local community voice in the plan-making process, and providing opportunities for community-led development."

Policy HC1(2) could also make clear that authorities should "engage proactively with local communities" in a way that builds voice and influence, which is itself a means to better public health. If the NPPF were to incorporate our proposals to engage with neighbourhood governance bodies in response to questions 12-14 were incorporated, that could also be cross-referenced to show how authorities could be working in partnership with communities at the neighbourhood level to ensure development leads to more confident, socially connected communities with suitable community facilities and socially-connected housing and other developments.

**182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

One of the government's objectives is to clarify and bring consistency to the interpretation of "weight". But we have experience of a conflict between the weight given to the protection of protected landscapes and the often-pressing need for housing and community facilities in rural settlements in these landscapes. We don't think the current policy offers guidance on how to reconcile and balance these.

Our members care deeply about protecting the landscapes they live in. But they take the view that if a local community living in a protected landscape is bringing forward a major development to provide homes and community facilities that ensure the

sustainability of the settlement, and meet existing needs of people with a connection to the settlement, this should generally be permitted.

In part the problem is that National Parks and National Landscapes have different statutory duties and roles, and so respond to housing proposals differently. National Parks and the Broads Authority have strong statutory duties to protect their landscapes, but they also have duties to foster the social and economic wellbeing of the local communities. Policy N4 references the “statutory purposes” of Protected Landscape bodies, but not their “duties” which would provide this broader context.

National Landscape authorities have no equivalent social or economic duties, and while some (such as in North Devon) have generally recognised the social and economic needs of those communities, others have at times objected to much-needed social housing on the grounds of landscape impact alone. Communities have had to rely on planning officers or committees giving the view of the National Landscape body less weight than local housing need, which Policy N4 risks making more difficult as drafted.

The Government’s vision and circular on National Parks and the Broads makes clear that affordable housing should be supported in these areas, and states the Government’s “expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services”<sup>7</sup>. This is precisely the kind of development that community-led applicants propose, led by and supported by the local community, to meet existing local needs and secure the sustainability of their settlement. But the NPPF protection sometimes leads to planning officers recommending against community-led development of this kind because of the weight given to landscape protection.

So policy N4 should refer to National Park Authorities’ statutory duty to foster the social and economic well-being of their communities, and make clear this must be considered in the balance.

This would be further enhanced by adding, to the list under N4(2), an assessment of the need for affordable housing and community facilities within the settlement, and a consideration of the sustainability of that settlement. Perhaps this is where reference to those statutory duties could be brought in. These would both be clear public interest tests, and give clearer guidance to authorities on how to weigh these and other important considerations.

---

7

<https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010>

Policy N4(2) could be amended to state that it doesn't apply to exception sites as defined in HO10. This would enable communities and affordable housing providers to bring forward 100% affordable housing projects without opening the door to inappropriate speculative development.

Alternatively, or in addition, the policy could cross-reference, or borrow from, the list of acceptable green belt development in GB7, which includes "limited affordable housing for local community needs".

**213) Do you agree that a 2.5 hectare threshold is appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

We partly agree, but think the housing number threshold is most useful, and that the site area may need clarification.

One point we think it would be helpful to clarify is how to treat an application which may cover an area of land above 2.5 hectares, but where only part of the site is being developed for housing, and the number of homes is therefore fewer than 50. For example, a CLT development slightly above this threshold involved building 75 homes, and the total area in the planning application was 5.62 hectares. But most of that area was to provide a new village green and woodland walk. Other CLT developments are similarly seeking to create new open space, or land for allotments, or other uses. We think they should still be considered as medium-sized developments, even if their land area may exceed 2.5 hectares.

**214) Do you agree that a unit threshold of between 10 and 49 units is appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree**

Yes

**222) Do you agree with the proposal to extend the Permission in Principle application route to medium development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.**

**a) Please provide your reasons, particularly if you disagree.**

Yes. Almost all community-led developments are for 10+ homes, and most would fit in the new medium category. We think our sector would benefit from making more use of permission in principle. In particular, it could improve project certainty and reduce risk and so improve access to finance at a stage where we suffer an acute and chronic shortage of financing options.

As with our proposals relating to Rural Exception Sites, we would also suggest communities and planning authorities would have more confidence in PiPs if the Town and Country Planning (Permission in Principle) Order 2017 were amended to require exception site PiPs to state the location, number of dwellings and proposed tenure mix; and if these could also be stated in non-exception site PiPs as conditions to be carried forward. This would reduce the caution we have seen from some local authorities in granting PiPs.