

Dorset CPRE Response - Proposed reforms to the National Planning Policy Framework and other changes to the planning system.

Introduction

This response has been prepared by Dorset CPRE (Campaign to Protect Rural England) we take an active interest in planning related matters in the BCP (Bournemouth, Christchurch and Poole) and Dorset Local Planning Authority Areas. We have prepared responses to selected questions.

The overall theme of the National Planning Policy Framework (NPPF) is the achievement of sustainable development as defined by the United Nations. This is to be achieved through balancing economic, social and environmental objectives. Given that we are in the midst of a global climate crisis with biodiversity in decline and at further at risk, never has the achievement of truly/genuinely sustainable development been more important. We are concerned that the emphasis of the proposed new NPPF has shifted in favour of economic development at the expense of meeting social and environmental objectives.

Local communities have an important role to play in ensuring that local development proposals are truly sustainable and are able to meet their needs. We are concerned about the centralisation of policy and decision making, and the absence of encouragement for public participation.

Office for National Statistics figures indicate that nationally our population is in decline with fertility levels well below replacement questioning the validity of the current approach for calculating housing need and the allocating ever more valuable farmland for housing.

As grassroots campaigners we are concerned therefore that the new NPPF, in failing to serve wider social and environment objectives, is not wholly in the public interest.

Responses to Selected Consultation Questions

Chapter 2: Plan-making policies

PM13: Setting standards

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

Strongly Disagree

Dorset CPRE strongly opposes the implementation of Section 43 of the Deregulation Act 2015 which will restrict local planning authorities in England from requiring higher energy efficiency standards for new dwellings than those set out in national building regulations.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

In the face of the climate emergency, it is essential that local authorities have the freedom to be able set ambitious targets, where justified, that go beyond national building standards, as currently facilitated by **Part 1** of the **Planning and Energy Act 2008**. Some local authorities, for example Bath and North East Somerset, have ambitious energy efficiency policies requiring all new buildings to be Net Zero in Terms of Operating Energy, this ensures that homes built today are fit for the future and hugely benefit their residents through reduced energy bills. The Government should be encouraging more local authorities to step up to the plate and demand that all new homes are built to be net zero both in terms of operational energy but also embodied carbon, not putting a ceiling on their ambitions.

In Dorset we would like to set these higher standards through a county-wide Design Code as has been done by other councils (e.g. Kensington and Chelsea). In particular, we would like to address inconsistencies in planning regulations that prevent temporary solar panels being installed in conservation areas (in a recent example Dorchester Town Council was prevented in installing panels on a roof that was invisible from the road); and preventing the installation of double glazed windows in listed buildings. Neither of these issues add to the heritage value but send a highly inappropriate message about priorities for reducing energy wastage and decarbonising our communities. This is a way in which local communities can pave the way for higher standards when governments move too slowly or inefficiently.

Chapter 3: Decision Making Policies

DM5: Development Viability

Policy DM5 – Development Viability

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

Partly agree

Policy DM5 represents a positive step towards reducing unnecessary and repeated negotiation of developer contributions by reinforcing the principle that development which complies with an up-to-date local plan should be assumed viable. This should help ensure that affordable housing and infrastructure requirements are known in advance and reflected in land values at the point of acquisition.

However, its effectiveness will depend on how tightly the circumstances allowing deviation from plan policies are defined. To genuinely prevent unnecessary negotiation, the policy must make clear that viability assessments should be the exception rather than the norm, and that land price paid or market fluctuations alone should not be grounds for reducing contributions.

Flexibility should be limited to clearly evidenced and genuinely exceptional circumstances, such as unforeseen abnormal costs or schemes that are materially different from the typologies tested at plan-making stage. Without this clarity, there is a risk that negotiation will continue under a different label, undermining the policy's intent.

With these safeguards, DM5 has the potential to both improve certainty and protect policy-compliant developer contributions while still allowing appropriate flexibility for development to proceed.

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

Policy DM5 has the potential to significantly improve confidence in the plan-led system by reinforcing the principle that development which complies with an up-to-date local plan should be assumed viable. This should reduce speculative land pricing, discourage routine viability challenges at application stage, and provide greater certainty that affordable housing

The policy should also improve transparency by narrowing the circumstances in which viability assessments are acceptable and by requiring any such assessments to be clearly justified and publicly available. This will help communities and decision-makers to better understand how conclusions on viability have been reached.

However, the effectiveness of DM5 will depend on clear guidance on what constitutes genuinely exceptional circumstances. If these are not tightly defined, there is a risk that viability negotiations will continue in practice, undermining the objective of simplicity and up-front clarity.

To maximise its impact, DM5 should be supported by:

- robust and up-to-date plan-making viability evidence,
- standardised assumptions on costs and developer returns, and
- a strong presumption against reducing policy-compliant developer contributions based on land price or normal market fluctuations.

Overall, Dorset CPRE supports the direction of travel of Policy DM5 but considers that its success will rely on disciplined implementation to ensure that flexibility is used only where strictly necessary and does not weaken the delivery of affordable housing and infrastructure.

Chapter 4: Achieving sustainable development

S3: Presumption in favour of Sustainable Development

36) Do you agree with the revised approach to the presumption in favour of Sustainable Development?

Disagree

Dorset CPRE are concerned that the proposed changes to the presumption in favour of (potentially un-) "Sustainable" Development and removal of footnote 7, significantly shifts the NPPF away from ensuring that planning decisions meet the stated economic, social and environmental objectives of truly sustainable development. Application of the current 'tilt' in favour of sustainable development contained within 11(d) of the current Framework has seen speculative development proposals granted planning consent on sites that do not fully meet the criteria to be considered truly sustainable often due to lack of transport and environmental issues. Extending the application of the presumption in favour of sustainable development as proposed in Policy S3 risks further opening the door to granting planning consent for development proposals on sites that do not fully meet the criteria to be considered sustainable.

S4: Principle of Development Within Settlements

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

Partly agree

Dorset CPRE support the Government's aim of maximising growth in urban areas. We believe that there are strong reasons why the UK should increasingly plan to live within its existing settlement footprint. Information published by the ONS shows that both the Number of live births and the total fertility rate are in decline, should immigration rates also reduce the UK population may well start to contract in the medium term. In other European countries this is already presenting challenges, as some settlements begin to contract or are abandoned particularly in rural areas. Therefore, in our opinion it is essential that the UK adopts a planning framework and principles which focuses development sustainably within settlements, prioritising the re-use of previously developed/brownfield sites. Within the Bournemouth Christchurch and Poole local authority there are number of consented brownfield sites for example, the site of the former Poole Power Station, that have the capacity to make a significant contribution towards meeting the conurbations housing requirement. These sites have been vacant for numerous years without any sign of construction commencing, whilst precious agricultural land is built on instead.

We welcome the weight given to protecting open space, sport and recreation facilities and designated wildlife habitats within settlements provided for in S4 para 2 it is essential that settlements contain quality environments incorporating greenspace and access to nature.

Adopting now any national planning framework which allows or encourages a significant expansion in settlement footprints along with development beyond settlement boundaries, would only lead to more severe problems in the future. We urge the government to avoid this and to show a lead in setting a new, sustainable course for future planning policy.

S5: Principle of Development Outside Settlements

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

Partially Disagree

We welcome the Government's stated aim of limiting development away from settlements and the need to safeguard the intrinsic character and beauty of the countryside. It is vital that the decision making process for development proposals in the countryside takes into consideration the impact on the landscape (designated/undesignated), farmland and the wider environment and that this is attributed significant weight. The application of the 'tilted balance' in favour of development as set out in policy S5 is not supported, the forms of development proposed have the potential to have significant impact on the countryside.

In principle we support the introduction of Policy S5h (development within reasonable walking distance of a railway station) this should include stations in existing towns/villages that are on a well-established rail network. In assessing development proposals consideration must be given to the impact on landscape, historic assets, and the environment.

The introduction of policy S5J (development which would meet an unmet need) is strongly opposed, this gives excessive weight to an unmet 5 year housing land supply and unfairly penalises local authorities who are unable to meet their housing delivery test, a matter which is outside of their control. Should this policy be introduced it will result in a significant loss of valuable farmland and consent being granted on sites that do not fully meet the criteria for sustainable development.

Chapter 5: Meeting the challenge of climate change.

CC2: Mitigation of Climate Change

43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2?

Partially agree

The Climate Change Commission has reported that the UK's approach to tackling climate risks is currently inadequate. The planning system has a significant role to play in reversing this and ensuring that the nation is fully prepared to meet the challenges of climate change and that climate targets are met.

Dorset CPRE fully agrees with the considerations for decision making set out in CC2, however we would like to see a more ambitious and pro-active approach. This should include requiring that all new buildings are Net Zero both in terms of their operational carbon and their embodied carbon. It is essential that measures are put in place to support an accelerated roll out of these homes. In our opinion the best/ most sustainable location for new homes is within the footprint of existing settlements, ensuring that green spaces in towns and villages and the transport infrastructure is properly planned, maintained and not eroded.

We support the establishment of district/local energy networks where locally generated energy is used locally, this benefits local communities with lower bills, energy security and a reduced carbon footprint.

CC3: Adaptation to climate change

44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3?

Partially Agree - especially that building on flood plains and potential flood risk areas is banned.

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

Agree

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

The most recent report from the Climate Change Commission (April 2025) reported that 6.3 million properties are situated in areas at risk of flooding from rivers, the sea and surface water. With rainfall increasing it is essential that we stop building on land at risk of flooding, or in the vicinity of flood plains. From an environmental perspective this reduces the capacity of the flood plain to store water resulting in increased flood risk elsewhere.

The UK is one of the most nature depleted countries in the world, if the UK is to meet its 30 by 30 targets, it is essential that climate change policy also encompasses measures that protects the natural world from further biodiversity decline resulting from climate change and enables nature to thrive. This should take the form of establishing greater areas that are protected for nature, linked by wildlife corridors. As outlined in Wildlife and Countryside Link's 2024 Report, [Improving Green Belt, for nature, climate and people](#), in addition to its statutory purpose of preventing urban sprawl, the Green Belt, has the potential to play a significant role in nature recovery whilst providing access to nature. We ask that the Green Belt purposes are updated to reflect this valuable role.

Chapter 6: Delivering a sufficient supply of Homes

HO5: Meeting the needs of different groups

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

Strongly agree

CPRE's State of Rural Affordable Housing report in 2023 showed a strong need for more genuinely affordable housing in rural areas, which is not being met by current planning policies. CPRE also showed that only about half of rural England can be considered a 'designated rural area' in terms set in this question, but the need for affordable housing is acute everywhere. If the change is brought in, it will help address the problem by making clear to landowners and developers that they should include affordable housing within the smallest sites of 10 homes or less, which isn't the case in half of rural areas at present.

60) Do you agree with our proposals to ask authorities to set out requirements for a broader mix of tenures to be provided on sites of 150 homes or more?

Partly agree

a) Please provide your reasons and indicate if an alternative site size threshold would be preferable?

Dorset CPRE strongly agree with the principle of requiring a broader mix of housing tenures (such as social rent and low cost ownership) on large housing sites being set out in national planning policy. Sir Oliver Letwin's review in 2018 made a powerful case for just this kind of policy. Currently, too many developments in rural areas simply consist of large expensive 4 and 5 bedroom houses for sale which are out of reach for most average wage earners. CPRE research has also shown that only 14% of new housing in rural areas can be classed as social housing for example, despite the particular need for this kind of housing in rural areas due to average incomes being lower than in urban areas.

Our main concern is that the policy doesn't go far enough because it relies too heavily on local plans being in place. CPRE research also found that most current plans in rural areas are inadequate with only 1 in 5 having any kind of policy seeking more new social housing, and many supporting housing market assessments being out of date or (in the case of Cornwall) absent entirely. The NPPF should therefore set minimum expectations for at least 10% social housing in all major new housing developments of more than 100 homes until plans are updated, indeed the threshold can be set much lower, indeed as low as 50 units.

HO7: Meeting the need for homes

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

Yes

The NPPF should set minimum expectations for at least 40% social housing in all major new housing developments of more than 100 homes until plans are updated, we also believe that the threshold

can be set much lower, indeed as low as 50 units

65) Would requiring a minimum proportion of social rent, unless otherwise specified in development plans, support the delivery of greater number of social rent homes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If so, what would be an appropriate minimum proportion and development size threshold taking into account development viability?

Strongly agree.

Requiring a minimum proportion of social rent homes (unless otherwise specified in development plans) would clearly support the delivery of a greater number of social rent homes. Without a mandatory requirement, social rent is often squeezed out by higher “affordable” tenures such as shared ownership or affordable rent, which are more financially attractive to developers but do not meet the needs of the lowest-income households.

A clear national expectation would:

- Give local planning authorities stronger leverage in negotiations.
- Create consistency and certainty for developers and housing associations.
- Prevent social rent being downgraded or removed on viability grounds as a default.
- Better align housing delivery with actual housing need evidenced in local housing registers.

a) What would be an appropriate minimum proportion and development size threshold taking into account development viability?

Minimum proportion:

- **At least 40% of all affordable housing as Social Rent**, with a long-term ambition to move towards **50%**, where viability allows.

This reflects:

- The acute shortage of genuinely affordable homes.
- Evidence that most households in housing need cannot afford Affordable Rent or shared ownership.
- Existing good practice in some local plans and mayoral strategies (e.g. London).

Development size threshold:

- Apply the requirement to developments of **10 dwellings or more**, or **0.5 hectares and above**, consistent with current affordable housing thresholds.
- Local authorities should retain flexibility to set lower thresholds in high-need areas (e.g. 5+ dwellings in rural or high-pressure markets).

On viability

To take account of development viability:

- Viability assessments should be **transparent, standardised, and independently reviewed**.
- Land value should be based on **Existing Use Value plus a reasonable premium**, not inflated hope value.
- Public land should lead by example with **higher proportions of social rent**.

- Where full compliance is genuinely unviable, commuted sums should be ringfenced specifically for social rent delivery.

Chapter10: Securing Clean Energy and Water

W1:Planning for Energy and Water

96) Do you agree with the approach to planning for energy and water infrastructure in policy W1?

Strongly agree

All developments must clearly show that there is a secure supply of energy and water to meet the needs of the development that is planned to be built. Interestingly, the chapter heading uses the term “clean” energy and yet the question does not specify that the source of energy should be “clean” (“power from sources with minimal or zero greenhouse gas [GHG] emissions, encompassing renewables (wind, solar, hydro, bioenergy), nuclear, and low-carbon sources like hydrogen and gas with Carbon Capture and Storage [CCS]”).

W3: Renewable and Low Carbon Energy Development and Electricity Network Infrastructure

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

Partly agree.

Dorset CPRE welcome the recognition of the important role that small scale community led developments can make towards meeting energy requirements. Our preference is for community energy projects, where schemes are owned/part owned by the community, ensuring that as much value as possible from the local energy infrastructure (generation and storage) is retained for the local community. We would like to see policies that give preference to, and for support solar schemes over car parks and roof tops. We would like to see policies in place that prevent prime agricultural land which is vital for the Nation's food security from being used for the production of solar energy. We welcome the introduction of the requirement for applications for temporary schemes to be accompanied by a decommissioning and site restoration plan.

W4: Water Infrastructure

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

Strongly agree,

Given the poor condition of our waters (rivers, lakes, seas), it is particularly important, that measures are in place to ensure that the discharge of water from any development, either from Water Recycling Plants (sewage treatment plants) or from surface water run-off helps to improve the quality of our waters and to reduce water borne pollution.

Chapter 11: Facilitating the sustainable use of minerals

CPRE supports the proposed changes to the policy on exploration for onshore oil and gas, aligning it with the policy for coal and peat. In particular, the development plan should NOT identify new sites

for oil and gas or for peat and coal extraction; and that the policy no longer provides that “great weight” should be given to the benefits of oil and gas extraction. This is an excellent opportunity to support the transition to green energy and to reduce the climate impacts associated with fossil fuel extraction.

We also support the greater emphasis on critical minerals (such as lithium and transitional metals) but all mineral extraction should be subject to consideration of its downstream emissions with the UK’s statutory carbon budgets and in alignment with the requirements of the Supreme Court’s Finch Judgement.

M1: Planning for a Sufficient Supply of Minerals

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

Strongly Agree.

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

Strongly Agree

Dorset CPRE strongly agrees with the proposal that the development plan distinguishes the three phases of oil and gas development and that this should only take place within existing licences.

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

Strongly Agree

Dorset CPRE strongly agrees that critical and growth minerals should be considered of national importance although there is a potential conflict if these minerals occur within protected landscapes and other sensitive areas.

M2: Safeguarding Mineral Resources and Infrastructure through Plan Making

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

Strongly Agree.

M3: Assessing the Benefits of Mineral Development

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

Strongly Agree.

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

Strongly Agree.

The primary reason levels of carbon dioxide in the atmosphere have soared is because of burning hydrocarbons – primarily Coal, Oil and Gas. As this country increases its renewable energy generation, so we become less dependent on high-carbon fuels. An essential step to help us

decarbonise and mitigate against climate change, is refusing to issue new extraction licences for oil, gas, coal (and peat).

Q107: Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply?

Strongly Agree.

It is clear that the impact of mineral extraction should be better managed and extraction sites should be properly restored at the end of their life to ensure minimal damage to the environment. One exception is that some extraction sites may become viable for low carbon energy generation (solar and wind for example). In this case, the ultimate need for site restoration should not prevent the re-use of the site for renewable energy generation.

M5: Development involving Peat, Coal or Onshore Oil and Gas

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

Strongly Agree.

We strongly agree that new sites for peat, coal, oil and gas extraction should be refused and that there should be support for underground gas storage (especially CO₂ and H₂) where appropriate. However, we disagree with the exceptions in Note 2 for coal extraction. Exceptions should only be made for public safety or for other “clean energy” schemes for example using old coal mines for geothermal energy and heat storage. The exceptions for coal mining to facilitate extraction of oil and gas (sounds like fracking) or for capture of methane from coal mines (which also sounds like fracking) should be removed along with any proposals for extraction of fireclay which are now redundant

Q110) Any other exceptional circumstances in which coal extraction should be permitted.

No

M6: Safeguarding Mineral Resources and Infrastructure through decision-making.

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

Strongly Agree

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

Strongly Agree.

M6 appears to contain sensible conditions to ensure flexibility in the system for future provision. These particularly apply to Minerals Consultation Areas.

Chapter 12: Making effective use of land

L2: Making effective use of land

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

Strongly Agree

Dorset CPRE supports the changes made in Policy L2 that give substantial weight to re-using previously developed land and emphasise the importance of supporting urban densification. However, this needs to be coupled with further incentives/measures to ensure that development occurs in the first instance on previously developed land. In far too many cases, planning consent is granted for schemes that do not proceed to completion, so it is essential that measures are put in place that require developers to complete their schemes within a given timeframe. As has been mentioned previously within the conurbation of Bournemouth Christchurch and Poole there are a number of consented brownfield sites, for example the site of the former Poole Power Station, where the long consented schemes are yet to be started, whilst precious farmland is released for development instead.

Chapter 13: Protecting Green Belt Land

Dorset CPRE object to the Government's proposed changes to Green Belt Policy as they seriously undermine the primary objective of Green Belt Policy of preventing urban sprawl by keeping land permanently open.

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

Partly disagree

The primary functions of the Green Belt are to ensure that urban sprawl is resisted, and development is focused on previously developed land in urban centres, sites that are less attractive to developers due to the increased costs associated with their development. Opening the door to the development of land around stations could reduce the incentive for developers to use previously developed land in the urban centres. This will result in un-necessary loss of valuable farmland/greenspace. As mentioned earlier there are a number of consented previously developed sites within the Bournemouth Christchurch and Poole conurbation, including the site of the former Power Station which have the capacity to make a significant contribution to the conurbation's unmet need. However, whilst these remain vacant, precious farmland is released and developed in their stead.

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

Strongly agree

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

Partly disagree

GB6: Control of development in the Green Belt

Dorset CPRE supports the control of development in the Green Belt. With regards to proposals for renewable energy schemes within the Green belt it is our opinion there is much untapped potential to meet this need through placing panels on rooftops and over carparks and this should be

prioritised over schemes utilising farmland in the Green Belt. Where it is absolutely necessary to use agricultural land for solar schemes, these should be designed to be dual purpose allowing agricultural activities to take place alongside energy generation.

GB7: Development which is not inappropriate in the Green Belt

We agree with changes to GB7(1a) with reference to "development" for agriculture rather than buildings. With regards to GB7 (b) we agree with the introduction of the new foot note 49, relating to the reuse of buildings, however, it is important that the requirement that the re-use of buildings must preserve the openness of the Green Belt and conflict with the purposes of including land within it should be retained, this protects against erosion of the Green Belt.

In principle Dorset CPRE support the appropriate re-use of previously developed land. However, the Government's definition of Grey Belt Land introduced in the December 2024 NPPF expanded the definition to go beyond the advertised previously developed land and to incorporate land that does not strongly contribute to any of purposes (a), (b), or, (d). This has undermined the effectiveness of Green Belt policy to restrict urban sprawl and encourage regeneration of our urban centres. It is also resulting in loss of valuable farmland and wildlife sites. Should this policy be retained it is essential that the definition is tightened up to ensure that high quality farmland and local wildlife sites are protected from being designated as grey belt, and grey belt development should not be allowed on appeal against local refusals of planning permission.

We strongly oppose the inclusion of GB 7 g ii and footnote 50. Land should not be released from the Green Belt for development where local authorities are unable to demonstrate a five-year housing land supply/ fail the housing delivery test, in this scenario an examination of why consented schemes are not being delivered should take place. Measures should then be taken to bring these schemes to completion.

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

Strongly disagree

We do not support the introduction of policy GB7 (h) which specifies that housing and mixed use development on Green Belt land is not inappropriate where it is near a well-connected station. As stated in response to question 133, this will undermine the five purposes of the Green Belt, in particular its function of assisting urban regeneration by encouraging the recycling of derelict and other urban land and safeguarding the countryside from encroachment.

GB8: Golden Rules

Q139) Do you agree that site-specific viability assessment should be permitted?

Partly agree

Site-specific viability assessments should only be permitted in genuinely exceptional circumstances and must not become a routine mechanism to undermine the Golden Rules or affordable housing delivery.

While there may be limited cases where abnormal costs or complex remediation justify a bespoke assessment (for example, genuinely previously developed land with contamination or infrastructure constraints), experience shows that site-specific viability assessments are frequently used to erode policy requirements after land has been acquired at inflated values.

This undermines:

- Plan-led decision making
- Community trust
- Delivery of affordable housing and infrastructure

Any permitted site-specific viability assessment must therefore:

- Be tightly defined
- Be independently audited
- Use standardised assumptions
- Be fully transparent and published

Without these safeguards, the policy risks perpetuating viability gaming rather than supporting genuine deliverability.

Q140) With regards to previously developed land, are there further changes to policy or guidance that could be made to help ensure site-specific viability assessments are used only used for genuinely previously developed land, and not predominantly on greenfield sites?

Yes. Further policy and guidance should:

1. Tighten the definition of “previously developed land”

Excluding:

- Agricultural buildings
- Garden land
- Temporary structures
- Land with minimal prior development

2. Require clear evidence of brownfield status

Including historic land use mapping and independent verification.

3. Apply a presumption against viability claims on predominantly greenfield sites, even if a small element is previously developed.

4. Introduce a threshold test

For example: at least 80% of the site must be genuinely previously developed before site-specific viability can be considered.

5. Standardise abnormal cost allowances

To prevent exaggerated remediation or infrastructure costs being used to justify reduced affordable housing.

Affordable Housing Floor

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

Strongly Agree

142) Explain your approach

Explain your answer and preferred approach

An affordable housing “floor” is essential to ensure that development on Green Belt land delivers tangible public benefit and does not result in schemes with little or no affordable housing due to viability negotiations.

A national minimum floor provides clarity, certainty and consistency and prevents a race to the bottom between authorities.

The preferred approach is:

Option (b): locally reflective floor linked to plan policy, with a national minimum safeguard

For example:

- The affordable housing floor should meet or exceed equivalent policy requirements for:
 - Brownfield land
 - Similar development types outside the Green Belt
- With a **national minimum of at least 40% Social Rent** as a safeguard where plans are out of date.

Anything lower risks legitimising Green Belt release without meaningful community benefit.

The purpose of the Golden Rules must be to secure:

- Social Rent homes
- Infrastructure
- Environmental enhancement

not simply to enable development viability.

Benchmark Land Values

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

Strongly Disagree

Reasons: 10×EUV risks undermining Social Rent delivery

Under previous guidance, Benchmark Land Value was typically calculated as:

- Existing Use Value (EUV) + a landowner premium (commonly around 20%)
- For agricultural land valued at £10,000 per acre:
- $EUV + 20\% = £12,000$ per acre

While imperfect, this approach at least attempted to keep land values anchored to current use and allowed the majority of development value uplift to be captured for:

- affordable housing (especially Social Rent)
- infrastructure
- environmental mitigation

Moving to a standardised benchmark of 10 × EUV would **substantially** raise the assumed land value in plan-making viability tests to:

£100,000 per acre (in the same example)

This represents an uplift of over 700% compared to the previous benchmark, dramatically increasing the residual land value that must be paid to landowners before any policy requirements are met.

This risks:

- Normalising inflated land expectations
- Reducing the surplus available headroom for Social Rent homes
- Locking in lower affordable housing delivery at the plan stage
- Undermining the stated purpose of the Golden Rules

Why a maximum of 3 × EUV is more appropriate: -

A benchmark of up to 3 × Existing Use Value would still represent a very substantial premium over current practice:

For agricultural land at £10,000 per acre:

3 × EUV = £30,000 per acre

This is:

- 150% higher than the previous EUV + 20% benchmark
- A clear and meaningful incentive for landowners
- High enough to encourage land release
- Low enough to preserve development value for public benefit

It strikes a more proportionate balance between landowner incentive, scheme deliverability and community benefit

The purpose of Benchmark Land Value at plan-making stage should be to answer, what level of land value allows policy-compliant development to be delivered? Not, what level of land value maximises landowner return?

A 10×EUV benchmark risks reversing this logic by embedding excessive land uplift into viability testing before affordable housing and infrastructure requirements are even considered

Guidance and Glossary

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

Strongly disagree

It is essential that footnote 7 is retained and that Green Belt land falling within high value environmental and heritage areas is protected from being designated as Grey Belt. The proposed changes to the grey belt definition coupled with other reforms to Green Belt policy will result in a significant increase in speculative planning applications on greenfield sites in the open countryside and loss of productive farmland.

Chapter 15: Promoting sustainable transport

In general, Dorset CPRE agrees with the vision-based approach to infrastructure planning and the overall desire to create sustainable transport routes which support active travel and public transport and suppress unnecessary private car usage. We live in a world with significant and difficult transport challenges which include safety, pollution, CO2 emissions and congestion whilst also recognising the impact of transport on quality of life and freedom to choose. This is not an easy area, and it often comes to a head in new developments where conflicting viewpoints bring neighbours into conflict with each other. A few principles are helpful including:

- New developments must be planned with sufficient and sustainable transport infrastructure both within the development and connecting to neighbouring areas.
- New developments need to take into account the impact on people in surrounding areas
- Ideally the transport infrastructure should be part of a long-term development plan which is in place long before the housing developments themselves are built.
- Housing must not be sited in locations where a car-based culture is the only option
- Public and active travel infrastructure needs to be in place when the first house is built not the last

TR1: Vision-led approach to Planning for Transport

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

Partly Agree.

The principles of a vision-led transport policy set a desired future, such as reduced car dependency and net-zero emissions, and works backward to create infrastructure that supports this, shifting away from traditional "predict and provide" models. This is a great basis for sustainable transport provision. However, despite fine words, the lack of suitable transport infrastructure continues to be one of the weakest areas of the NPPF. Many developments are built without due consideration of the impact they have on new residents nor the communities that live around them. Therefore, a "vision-led approach" should not be used as an excuse for governments to underfund basic infrastructure or to fail to carry out proper long-term planning of development and infrastructure which is essential to prevent long-term problems with congestion and lack of facilities leading to poor outcomes. In this respect, in the UK we are a long way behind our colleagues in many other European countries.

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

Partly Agree.

The wording of TR2 is encouraging to sustainable transport but is still very much geared towards car-based developments. There is nothing in the policy to suggest the aspiration of car-free neighbourhoods with high quality public transport and active travel provision. Parking standards should always be set locally and in urban environments they should often discourage private cars through a reduction or elimination of car parking spaces and an increase in parking charges. Instead, residents are encouraged to use public transport, active travel or car clubs. Greenfield developments are usually car-led from day one which is a tragedy. It is essential that the full public transport provision should be available once the first house is built otherwise car-dependent habits form early

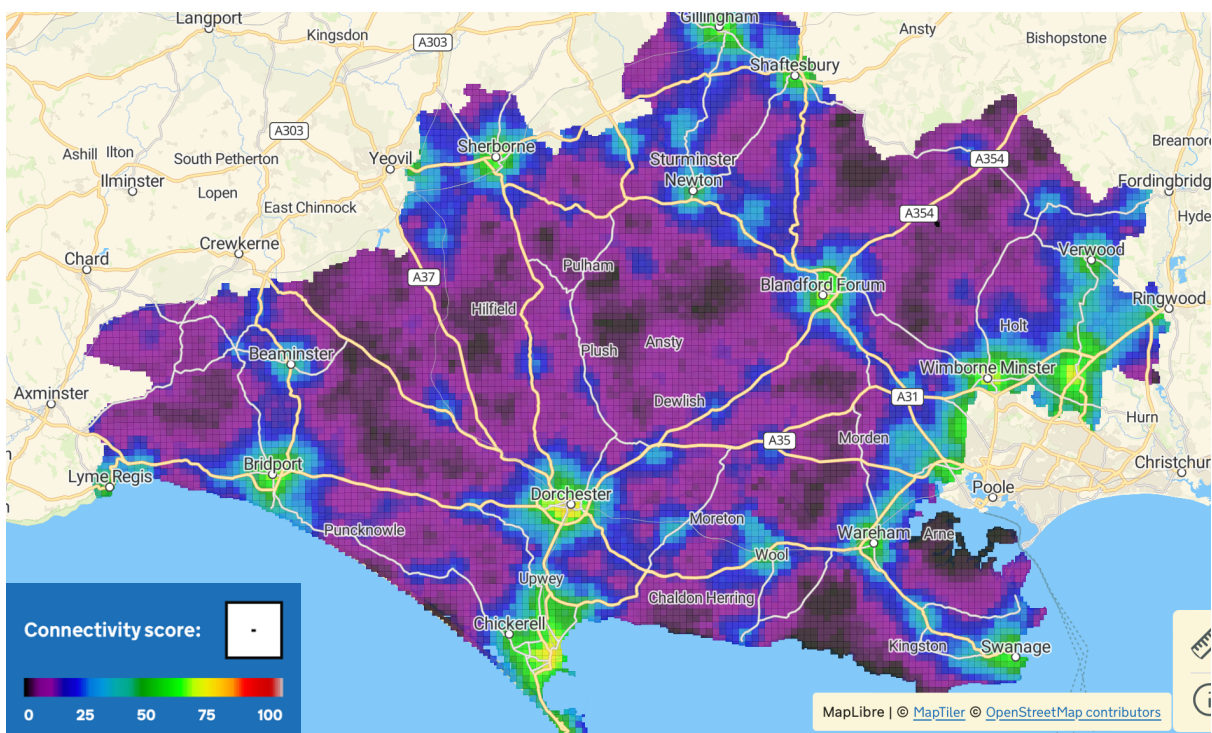
and can never be changed. This is one of many reasons why CPRE supports brownfield developments (often in urban environments) first.

TR3: Locating Development in Sustainable Locations

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

Strongly Agree

Dorset CPRE strongly agree with the need to limit the need to travel by offering a genuine choice of transport modes. In practice this is rarely the case in many greenfield developments. The connectivity tool may have its uses but it appears to provide little more in the way of insights than those we already know - that most of Dorset is a public transport desert !



Transport Connectivity map for overall transport (except driving) using the [government connectivity tool light](#).

TR4: Street Design, Access and Parking

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

Partly agree.

The considerations for street design, access and parking are sufficient for the development area itself but insufficient to evaluate the impact of the development on the surrounding communities. Unfortunately, Britain's transport system is full to capacity in many parts of the country. The cumulative impact of many small historic developments without investing in long-term infrastructure has often been catastrophic as regards congestion, pollution, impact on business and quality of life. As a result, even small new developments can now have a big impact on increasing travel misery for thousands.

TR5: Roadside Facilities

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

Partly Agree.

TR5 correctly identifies the need for roadside facilities for car and lorry drivers including electric vehicle charging, lorry parking, driver welfare, safety, and (although unstated) access to petrol pumps. However, this is a uniquely driver-centred policy. There is no equivalent policy to support the needs of public transport users or active travel users . . .

TR6: Assessing Transport Impacts

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

Partially Agree.

The key words here are in TR6 point 3 which states: “All development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts).” These are indeed fine words but in practice they are rarely properly considered so we are sceptical that a mere change of wording will be enough.

TR7: Marine Ports, Airports and General Aviation Facilities

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

Strongly Agree.

Good transport links to airports and ports is essential in a modern economy. At the same time these transport links must not compromise the environment through unacceptable noise, air quality, carbon emissions, visual impact, landscape and more. Defining “satisfactory” levels of such impacts that need to be adhered to is much more difficult to achieve than just saying the words.

TR8: Public Rights of Way

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

Strongly Agree

Existing Rights of Way need protecting and new ones to be formed in response to the evolving pattern of housing and industrial developments.

Chapter 18: Managing Flood Risk and Coastal Change

F3: Managing Coastal Change

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

Strongly agree

Anything which can be done to reduce the risk of development taking place on areas at risk of flooding and or coastal/estuary/tidal river bank erosion should be done.

F5: The Sequential Test

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

Strongly agree.

Current planning policy requires surface water flooding to be dealt with in exactly the same way as flooding from rivers. Surface water flooding is of an entirely different character caused by drainage systems failing to cope with the sheer volume of rainfall. The solution is to upgrade the drainage system, often achieved by installing a variety of mitigation measures such as SuDs (sustainable drainage systems).

However, in late 2024 a court judgement revealed everyone had been misunderstanding policy all along (<https://www.bailii.org/ew/cases/EWCA/Civ/2025/32.html>). Rather than recognising that the new drainage scheme would address any potential flooding issues, the result was that surface water flooding was to be treated in exactly the same way as flooding from rivers. This was having a very real impact on the delivery of new homes. Planning applications and appeals were being refused for failing to deal with the policy correctly.

Introducing the changes proposed in Policy F5 would make it clear the sequential test is not required for sites which are only subject to surface water flood risk, and where the surface water drainage scheme takes that into account.

No further comment on the “further addition to the policy”.

F6: Development in areas at risk of flooding from rivers or the sea

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

Strongly agree

F8: Sustainable Drainage Systems and Watercourses

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

Strongly agree

We would strongly agree with Policy F8. New sustainable drainage systems (SuDS) standards were introduced by the government (July 2025). DEFRA issued the first updated guidance in a decade for housebuilders, which would require them to create rainwater management systems that replicate the natural environment as part of their schemes. Housebuilders are to be encouraged to include features that collect and filter rainwater, as well as introduce materials to absorb water to ensure developments are better protected against flooding.

The SuDS guidance features two types of standard; the hierarchy standard which relates to the choice of final runoff destination, and fixed standards which relate to the minimum design criteria for surface water drainage systems and how they should be built and operated.

Other features of the updated standards include a requirement for housebuilders to improve water quality before it enters rivers and streams, encourage water efficiency at schemes and provide community benefits through the creation of “attractive and resilient places to live and work”.

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

Strongly agree.

De-culverting helps to reduce flood risk, enhances biodiversity, improves water quality, and can provide additional recreational amenities.

F9:Development in Coastal Change Management Areas

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

Strongly agree,

We agree particularly with the aim to prevent new residential development being built in areas at risk of being flooded, especially in this case from the threat from coastal erosion.

Annex F: Managing Flood Risk and Coastal Change

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

Strongly agree

Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.

I would expand the use of the term “Data Centres” to “Data storage centres”.

Chapter 19: Conserving and enhancing the natural environment

N1:Identifying environmental opportunities and safeguards

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

Partly disagree

Dorset CPRE welcomes certain strategic initiatives, including the introduction of Local Nature Recovery Strategies [LNRS] and the long-overdue Duty on relevant authorities to seek to further the purposes of Protected Landscapes, enacted in the Levelling Up and Regeneration Act [LURA] 2023. We also welcome the new NPPF’s proposed stronger focus on green infrastructure and nature-based solutions.

However, we have some serious concerns about national policy regarding the balance between development and the natural environment. We share the concerns of the Wildlife Trusts and others

about the weakening or potential weakening of environmental and nature protections, and about the real uncertainties surrounding both the impacts and effectiveness of new approaches, for example to securing Biodiversity Net Gain, and whether such schemes will deliver their expected benefits. For example, while schemes for promoting “off-site” BNG may create some opportunities for benefits to the natural environment and biodiversity, there are also risks of negative impacts and losses associated with this approach.

By way of background, we point out the following.

At the 2022 UN Biodiversity Summit (COP 15) the UK committed to support the global target to protect 30% of Land and Sea for Nature by 2030 (30by30). The Government’s recently published report [Global Biodiversity Loss, Ecosystem Collapse and National Security](#), together with the quinquennial national and local State of Nature reports, illustrate how far Britain is from achieving this commitment. As the National Trust observed in a recent interview with the Prime Minister: “we are only at 6%”.

The reports cited above provide clear pointers to what the UK and other nations need to do, not least:

- Implement the 30x30 commitment, i.e. to protect 30% of terrestrial and marine areas for nature by 2030,
- And additionally, actively have 30% of biodiversity under restoration and recovery by 2030.

Realistically, there seems no chance of this being achieved. Moreover, it is one thing to designate areas, but something else entirely to take the actions necessary to see nature demonstrably on a path to recovery.

The last “State of Nature” report for the UK, and the report for Dorset, showed both terrestrial and aquatic/marine biodiversity continuing in decline. Even in Dorset nature continues to decline, despite our outstanding environment, including two National Landscapes, the UNESCO-designated World Heritage Jurassic Coast, unique Lowland Heath habitats and Britain’s first Super NNR with the greatest biodiversity in the UK, Poole harbour [the second largest natural harbour in the world], Marine Conservation Areas, etc.

The next State of Nature reports, nationally and for Dorset, will show whether experts assess that we have yet turned the corner on decades-long nature decline and habitat degradation country- and county-wide.

Dorset and BCP are well-placed “naturally” to contribute to meeting the 30x30 commitment but struggle to protect our sensitive natural habitats and landscapes whilst meeting housing needs. Housing schemes repeatedly fall short on biodiversity enhancement, landscape protection, sustainable drainage, nature connectivity, tree cover, ecological mitigation, and the provision and quality of green infrastructure.

Will the new changes, enacted in the Planning & Infrastructure Act, and proposed in the new NPPF, help England and Dorset to achieve the 30 x 30 commitment and to achieve positive nature recovery? We are encouraged by the potential which could be offered by some initiatives, including strategic, landscape-scale interventions in Environmental Improvement Areas [the first round of which includes Poole Harbour EIA] and the funding for these.

However, we remain to be convinced that projected Biodiversity Net Gain schemes, whether overseen by Local Authorities or others on their behalf, will have sufficient rigour, including arrangements for both short and long-term monitoring and enforcement, to ensure delivery of the schemes’ much-publicised aspirations.

Above all, we share the concerns expressed by the Wildlife Trusts, Wildlife and Countryside Link [of which CPRE is a member] and others that the “lazy narrative” of nature/environment vs growth and the erosion of environmental protections are deeply disappointing, especially from the Party which enacted such post-war legislation as the National Parks and Access to the Countryside Act 1949, described by the then government as “the natural health service,” complementing the new NHS, and the Town & Country Planning Act 1947.

These and subsequent legislation laid the foundations of a system of environmental and nature protections which we wish to see strengthened and enhanced, not weakened, not least to help Britain to address the existential challenges of the climate and nature emergencies. Any government moves to weaken such protections involve great risks - for nature, climate, the economy, and for present and future generations

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

See reply to 179

N2: Improving the natural environment

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

Partly agree

Dorset CPRE are concerned that the new policy N2 will be insufficient to protect valued aspects of our rural landscapes, especially those outside nationally protected landscapes which are covered by Policy N4. Valued aspects of landscapes are currently protected under paragraph 187 of the current NPPF. I therefore ask for N2 paragraph 1(a) to be amended to refer to 'landscape character and value.'

We do not believe that protection for our highest quality farmland is strong enough. 2022 CPRE research found that in the past 12 years we lost over 14,000 hectares of prime agricultural land to development including 287,864 houses - equivalent to the productive loss of around 250,000 tonnes of vegetables and enough to provide nearly two million people with their 5 a day for an entire year. I call for policy N2 paragraph 1(b) to be changed to state a firm presumption against development of the highest quality (grades 1-3) farmland.

We welcome the new policy protections for established trees and hedgerows in policy N2 paragraph (1) (d) but call for the words 'wherever possible' to be removed as this will encourage non-compliance. CPRE is contributing towards the Environmental Improvement Plan's hedgerow planting target through our Hedgerow Heroes campaign. It is important that this work is backed up by commitments on developers to retain hedgerows where new development takes place.

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?

Partly disagree.

The Levelling Up and Regeneration Act introduced the requirement for relevant authorities to 'seek to further' the statutory purposes of protected landscapes, reflecting the important place that protected landscapes have in the nation's heart. These landscapes are our national jewels and deserve the greatest protection not only because of their natural beauty but also because they contain vitally important natural habitats. Dorset has two National Landscapes, the Cranborne Chase National Landscape, and the Dorset National Landscape which includes the UNESCO World Heritage Jurassic Coast. These play a key role in a thriving economy, as well as in helping ecosystems and communities to thrive. The Glover Review recommended that Dorset's exceptional, internationally important landscapes, biodiversity and heritage be seriously considered for National Park Status.

We are concerned that the phrase, 'which have the highest status of protection,' has been removed particularly in light of the weakening of protections in N4 2.

190 of the current NPPF states that, "When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development." this has been changed in N4 2 to read, "Proposals for major development within protected landscapes should only be supported in exceptional circumstances." This change of wording is particularly relevant, when considered in conjunction with policy S5 1 J which facilitates development outside settlements where there is evidence of unmet need. This weakens the protection afforded to protected landscapes and would allow major development that would currently be considered inappropriate.

N4 3 introduces a requirement for major development proposals to take steps to mitigate potential adverse impacts of major development with the associated footnote 71 allowing for compensation where significant harm cannot be mitigated. Whilst we support mitigation of potential adverse impacts of development, in those instances where significant harm cannot be mitigated, the application should be refused.

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

Strongly agree

Chapter 20: Conserving and enhancing the historic environment.

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

Partly agree.

Dorset CPRE would welcome the implementation of the LURA 2023 provision to extend special regard duties to other heritage assets including World Heritage Sites, registered parks and gardens, etc. We provisionally support the countenancing of proposals for the sustainable redevelopment of heritage assets, such as vacant, deteriorating, neglected and at risk listed buildings, where such proposals could help ensure a sustainable future for such assets.

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

Strongly agree

HE5: Assessing Effects on Heritage Assets

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

Strongly agree.

HE6: Proposals Affecting Designated Heritage Assets

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

Neither agree nor disagree.

Dorset CPRE prefers the retention of the concept of "optimum viable use" and of "great weight" in relation to the protection of heritage assets in the NPPF.

HE7: Decisions on Non-Designated Heritage Assets; HE 8: World Heritage Sites; HE9: Conservation Areas; HE 10 Archaeological Assets

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

Strongly agree.

Annex B – Questions on Standardised Inputs in Viability Assessment

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

Answer: **Strongly agree.**

Rationale:

Growth testing can help ensure that assumptions about costs and revenues over long build-out periods are explicit and transparent. However, it must be carefully defined to avoid complexity and delay. For Dorset, with limited large strategic sites, this can particularly aid clarity and avoid ad-hoc renegotiation of contributions mid-scheme. CPRE Dorset supports growth testing only where it improves clarity and plan compliance, not as a loophole to dilute contributions. Growth testing should be used only for genuinely large, long-term, multi-phase developments where it improves transparency and **supports the capture of future value uplift**. It should not be mandatory for smaller schemes, nor used to justify reducing or deferring policy-compliant up-front contributions.

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

Answer: **Partly agree.**

Rationale:

Regeneration schemes may benefit from growth testing where there is long lead-in time or complex phasing. But this should remain optional and used only with clear justification to avoid undermining front-loaded developer contributions. Growth testing should not be used as a general "escape route" to negotiate down planning obligations.

202) Do you agree greater specificity, including single figures, which local planning authorities could choose to diverge from where there is evidence for doing so, would improve speed and certainty?

Answer: **Partly agree**

Greater specificity would improve consistency and reduce negotiation, provided that figures are treated as a default rather than rigid rules and can be adjusted where robust evidence exists. A single industry-wide figure risks oversimplifying different risk profiles across tenures and development types. Rather than a single blended figure (e.g. 17.5%), developer returns should be explicitly linked to differential risk across Gross Development Value (GDV) streams.

203) Are there any site types, tenures, or development models to which alternative, lower figures to 15-20% of Gross Development Value might reasonably apply?

Yes

Affordable housing and there is a known buyer where 6% is a reasonable GDV stream return.

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

Yes

- Require profit assumptions to be applied separately to different Gross Development Value (GDV) streams, distinguishing between market housing and affordable housing tenures. Affordable housing typically carries significantly lower risk where values are fixed and purchasers identified in advance, and therefore justifies a lower profit margin.
- Provide nationally defined default ranges for different development types and tenures, with clear justification required for any departure. This would reduce subjective negotiation while retaining flexibility where robust evidence exists.
- Clarify that foreseeable site costs and risks should be reflected in land value, not in elevated profit expectations, reinforcing the principle of policy-compliant benchmark land value.
- Require viability assessments to include a transparent summary of profit assumptions, explaining how they relate to risk, tenure mix and delivery model.
- Encourage alignment between plan-making viability evidence and decision-taking viability assessments, so that profit expectations are consistent and predictable from the outset and can be priced into land transactions.

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

See answer to 204

206) Do you agree there are circumstances in which metrics other than profit on gross development value would support more or faster housing delivery, or help to maximise compliance with plan policy?

Answer: **Partly agree**

Alternative metrics such as Internal Rate of Return or Return on Capital Employed may be useful for long-term investment models or large phased schemes. However, they are more complex and volatile and risk reducing transparency for decision-makers and communities. Profit on GDV should remain the primary metric for most housing development.

207) Are there types of development where alternative metrics should be routinely accepted?

Answer: **Yes, in limited circumstances**

Alternative metrics may be appropriate for: Strategic multi-phase schemes, Build-to-rent developments, Public-private regeneration projects. They should not be routinely used for standard market housing developments.

208) Do you agree that guidance should be updated to reflect the fact a premium may not be required in all circumstances?

Answer: **Strongly agree**

Circumstances where premium may not be required include; public sector land, land held for regeneration or public benefit, land that is a liability (e.g. contaminated or vacant sites), Where landowners have non-financial objectives. This would improve realism in benchmark land values and prevent inflated premiums from undermining policy compliance. It would support regeneration and affordable housing delivery without discouraging land supply where markets are functioning normally.

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

Answer: **Strongly agree**

An extant consent does not necessarily reflect real-world land value if market demand has changed or if the consent is no longer viable. Automatic reliance on extant consents risks inflating benchmark land values and reducing developer contributions.

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

Answer: **Decision-maker discretion**

Local planning authorities are best placed to assess whether an extant consent has realistic market relevance, informed by local evidence. A rigid national metric (such as time elapsed) would be too blunt and may produce perverse outcomes.

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

Require market evidence to be drawn only from policy-compliant developments. Mandate transparent adjustments where evidence is not policy-compliant. Prohibit use of historic transactions that did not include affordable housing or infrastructure contributions. Require independent verification of benchmark land values. This would prevent inflation of land values over time and protect plan-led development.

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

Answer: **Strongly agree**

Cross-checking residual land values against comparable schemes would:

- Identify unrealistic assumptions
- Expose inconsistencies where high land prices contradict claims of non-viability
- Improve scrutiny and confidence in viability assessments