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## **Re: National Planning Policy Framework consultation (July-September 2025).**

Lewes District Council (the council) welcomes the opportunity to comment on the government's consultation on the National Planning Policy Framework published on 30<sup>th</sup> July 2024. The council has set out its detailed response to each consultation question in Appendix 1 to this letter, but we would like to draw your attention to a few key points within our fuller response.

### **Background to Lewes District**

Lewes District covers an area of 292 sq. km and has, according to the 2021 Census, a population of 99,905. It is estimated that around 75% of the population resides outside of the National Park in the main urban areas of Newhaven, Peacehaven, Seaford and Telscombe Cliffs/East Saltdean along the English Channel coast. The area of the district to the north of the National Park differs and is typified by a gently undulating low weald landscape, abundant woodland and river valleys, interspersed by small rural villages. Ringmer and Newick are the two largest villages in this area. The South Downs National Park covers just over half of our geographic area, including the town of Lewes which exerts a strong influence on the district alongside the city of Brighton. The towns of Haywards Heath and Burgess Hill in Mid Sussex also exert an influence, albeit to a lesser extent. The South Downs National Park Authority is the responsible local planning authority for the areas of the district within its boundary and will be submitting a separate response to this consultation.

### **Local Plan Housing Target**

While there is reference in the NPPF to National Parks, it is not clear whether the 'automatic' exceptional circumstance will be given the same level of consideration for the local plans of planning authorities hosting a National Park. Much like many other authorities, the revisions proposed to the Standard Method, introduced in 2018, result in a further increase in the housing need for the district. Meeting this need will be a challenge for both planning authorities and we would welcome the opportunity to discuss with you how national policy can support our approach to disaggregating this need between our district and the South Downs National Park Authority. We have set out our approach in our paper published in May 2021(attached to this response see Appendix 2). We suggest that this should be considered for inclusion in national planning policy for local plan areas where data used in the Standard Method does not align with plan making areas.

### **Changes to Affordable Housing**

The council welcome the announcements of measures to support social and affordable housing. Increasing provision of affordable housing, including social housing, will not only provide homes for those most in need, but it will also relieve the financial pressures on local authority budgets, which are increasingly becoming difficult to balance.

### **Reforms to the NPPF, planning**

Lewes District Council commenced work on a new local plan in 2020 having adopted its Plan in 2016 (Part 2 in 2020). However, in this time the NPPF has been revised constantly, leading to delays in our local plan's progress. I am asking that you consider through the reforms to national policy how you can provide certainty and stability to local planning authorities. In turn, this will provide local planning authorities, and more importantly their communities the control over what development takes place without undermining the 'plan-led' system within England.

Finally, the council would the opportunity to meet with officials from the Ministry to discuss the points that we raise both within this letter and in our detailed response to the consultation. We would be more than willing to host you in our district, so that you are able to enjoy the beauty of our part of England but also to see firsthand for yourself the challenge that you are setting for us.

Yours faithfully,

Nadeem Din

Head of Planning Policy

Lewes & Eastbourne Councils.

## Appendix 1: Lewes District Council, Response to National Planning Policy Framework consultation (July-September 2025).

24 September 2024

### National Planning Policy Framework Response by LDC

Questions	Draft Response
Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?	Removing reference to the outcome of the standard method being an 'advisory starting point' is not supported. Any assessment of housing need based on an arithmetical increase in housing stock is opposed, particularly where further increases to that need figure will be based on the affordability of current homes. Building substantially more homes in the South-East of England, in places such as Lewes District, in an effort to address affordability is challenging in view of the capacity of the natural environment and infrastructure constraints. Instead, mandatory top-down targets should be removed in favour of providing the means, to deliver much needed social housing, especially for councils that have established a track record in such delivery
Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?	<p>This is not supported. Local authorities should be able to establish their own housing need figures based on the characteristics of the plan area. This means that for local authorities whose planning boundaries do not accord with their administrative boundaries, exceptional circumstances should be accepted as default when setting the housing requirement through their plan and PINS at examination must give greater consideration to this.</p> <p>LDC has set out its approach to local housing need in May 2021 and we request that the government uses this as a starting point for discussions with us and other authorities to develop a planning system that will truly help to deliver the housing that is needed in our plan areas.</p>
Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?	Local authorities should be able to establish their own housing need figures based on the characteristics of the plan area. Inherently need is most generated from, and best met, in urban areas. Urban areas are also the most sustainable locations for delivering housing and therefore the removal of the uplift should not detrimentally result in rural areas having to deliver a higher level of housing because of the decrease of supply from such places.

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<p>Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?</p>	<p>While the increased focus on density is supported as one way in which housing needs can be met, there needs to be a nuanced approach to how density is set. Higher densities can be achieved best where there is a higher degree of public service infrastructure provision such as a choice of means to travel. In rural areas there is often insufficient infrastructure provision, especially public transport. Appropriate higher density development in rural locations may complement the existing character. However, without improving the public transport infrastructure, either ahead or alongside development, this will result in a continued reliance on the private vehicle and the problems this creates for our achievement of climate change objectives.</p>
<p>Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?</p>	<p>Yes. The change in characteristics across an authority area mean that authority-wide design codes are likely to be ineffectual as they cannot provide sufficient detail to be appropriate across wide areas. Design codes could be an important tool in helping to deliver local plan strategies, so focusing design coding on individual sites and areas of change would be more efficient and effective.</p>

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<p>Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?</p>	<p>Neither the presumption in favour of sustainable development nor the proposed amendments are supported. The presumption in favour of sustainable development, when coupled with the unachievable timescales proposed for the review of plans, means that local authorities have insufficient time to be able to plan for their areas, especially with regards to achieving protection and enhancement for the natural environment, due to the pressures to meet their development needs. Many planning authorities are presented with high numbers of applications for speculative development which it is not possible to co-ordinate in a way which addresses their cumulative infrastructure requirements. This piecemeal approach is unsustainable and undermines a genuinely plan led system of development.</p> <p>Modifications are required to the NPPF so that it is clear that, while a plan may be considered to be ‘out of date’ due to the lack of five-year housing land supply, the overall spatial strategy should still be given weight in decision making. We suggest that where a local plan has been adopted within 5 years, then the requirement to demonstrate a five-year supply should not apply, as otherwise the local plan would become ‘out of date’ ahead of the five-year review period. The new footnote 8, is welcomed as a helpful clarification, however footnote 9 should be amended to address our suggestion above.</p> <p>Furthermore, consideration in decision-making, to the location of proposed speculative development outside of defined planning boundaries should be given greater weight, especially, where such proposals would develop land that is currently being used or has been identified for climate mitigation or nature recovery for instance through a Local Nature Recovery Strategy. Where proposals would result in increased populations in private car dependent communities, such as are found in many villages, this should also be given great weight in decision making in an effort to reduce carbon emissions. The principle of extending villages outside of established adopted settlement boundaries should only be agreed through the local plan process unless it is for affordable housing through a rural exception site policy.</p>
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<p>Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?</p>	<p>The need for local authorities to be able to demonstrate a five-year housing land supply against their adopted plan requirement has our qualified support, as long as further reforms to the NPPF do not ‘cancel’ the adopted requirement. The adopted requirement should not be substituted for an alternative housing requirement figure while a replacement local plan is being developed in a timely manner. Nor should the demonstration of supply be required for the first five years post adoption of a local plan.</p> <p>In addition, local authorities should not be penalised for the deliverability of the sites that make up their land supply. The measurement should be the amount of consented development in the plan area. Granting more permissions does little to impact on the deliverable supply, nor bring sites forward. Where authorities have consented to sufficient development to meet their adopted housing requirements, further development should not be given de-facto permission by reason of the presumption in favour of sustainable development. The deliverability of sites is largely in the hands of developers and further incentives to encourage developers to implement permissions should be introduced such as adjustments to the time period for which permissions are valid or through adjustments to S106 terms. The consideration of the developer’s previous delivery record should also be a valid material consideration in decision making.</p>
<p>Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?</p>	<p>The approach is supported. The existing wording in Paragraph 77 brings unnecessary complications into the establishment of an authority's land supply position and does little to address the issue that the delivery of sites is market led and outside the control of a local planning authority.</p>
<p>Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?</p>	<p>No. The buffer should be removed as it only serves to undermine the plan-making system and enable 'unplanned' development to come forward.</p>
<p>Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?</p>	<p>See response to Q9.</p>

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<p>Question 11: Do you agree with the removal of policy on Annual Position Statements?</p>	<p>The approach is supported. The existing approach to position statements brings unnecessary complications into the establishment of an authority's land supply position. They are resource intensive and by the time they are given consideration by the Planning Inspectorate, the position on the ground is likely to have changed.</p>
<p>Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?</p>	<p>Yes. Effective co-operation on cross boundary and strategic planning matters is of vital importance as issues do not stop at local authority boundaries. However, the duty to co-operate has proved to be an ineffective tool in addressing 'wider than local' issues outside of city regions. It has also made local plan examinations more complex, difficult and expensive. More efficient tools and processes to address cross boundary and strategic issues need to be considered by Government. Both national and sub-national plans are required to ensure effective cross boundary co-ordination on strategic planning matters, without which the delivery of such matters is difficult. There is a need for a meaningful national land use strategy, rather than solely relying on adopted local plans. This should address issues of national importance such as food security, climate change mitigation and adaptation, biodiversity and nature recovery.</p>
<p>Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?</p>	<p>Yes. Tests of soundness for local plans may not be appropriate for strategic plans, as strategic plans are likely to cover a longer period and therefore deliverability is likely to be more difficult to demonstrate. We would expect government to consult on the text of any proposed soundness tests and have meaningful engagement with local planning authorities ahead of implementation brought in for strategic scale plans.</p>
<p>Question 14: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No comment.</p>
<p>Question 15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?</p>	<p>Any assessment of housing need based on an arithmetical increase in housing stock is opposed, particularly where further increases to that need figure will be based on the affordability of current homes. Building substantially more homes in the South-East of England, in places such as Lewes District, in an effort to address affordability is challenging in view of the capacity of the natural environment and infrastructure constraints. Instead, mandatory top-down targets should be removed in favour of targets for, and the means to deliver, much needed social housing.</p>

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<p>Question 16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?</p>	<p>Mandatory top-down targets should be removed in favour of targets for, and the means to deliver, much needed social housing. Covid-19 has had a consequential impact on working practices. Many more people are choosing to work in a more flexible way, away from offices either in their homes or in shared affordable workspaces closer to where they live. We would welcome flexibility within the method for local planning authorities to either use the work-based or residence-based affordability ratios to better reflect their local circumstances based on robust evidence.</p>
<p>Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?</p>	<p>We do not agree with the increased weighting that is being given to affordability. The affordability of homes has largely remained unaffected by increases to housebuilding targets or improved effectively the delivery of housing on the ground. Further increasing house building targets in an effort to increase affordability is highly unlikely to increase supply nor decrease house prices, especially in the South-East of England, where house prices are some of the highest in the country. The high housebuilding targets being assigned to local planning authorities merely result in unmet needs which local planning authorities are currently required to negotiate to meet with their neighbours through the duty to co-operate. This not only leads to delays in plan making but also results in increasing costs for under-resourced local authorities when preparing local plans.</p>
<p>Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?</p>	<p>We support the need to deliver the much needed social housing. The focus should be on delivering homes for rent at prices that people in the local area can afford. Should targets for the delivery of social housing be required, then rental affordability should be included within these.</p>



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<p>Question 19: Do you have any additional comments on the proposed method for assessing housing needs?</p>	<p>We would welcome further guidance coming forward that will provide clarity with regard to disaggregating local housing need. We would welcome inclusion within the NPPF of text to support the approach that we have set in our May 2021 paper for disaggregating the Lewes District local housing need between the South Downs National Park and the LDC . This will mean, that Lewes District Council, alongside other local planning authorities which host a National Park are only planning for the need that is arising within the plan area boundary, rather than for the areas of the district for which the National Park is the responsible local planning authority. It is right that given that the primary purpose of National Park authorities is the safeguarding of this important National Landscape, that any exceptional circumstances resulting in not using the Standard Method within the park boundary are acknowledged through the housing need identified in the Standard Method as applied to the hosting district’s plan area.</p>
<p>Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?</p>	<p>The emphasis on brownfield land within settlements is supported. However, brownfield sites in rural areas are not necessarily in good locations for development and therefore changes to the paragraph should not apply to these locations. Clarification should be included in the NPPF that previously developed land within adopted settlement boundaries is the target of the policy approach being.</p>
<p>Question 21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?</p>	<p>The emphasis on brownfield development is supported where sites of significant biodiversity value are not compromised within the countryside as a whole and not just in the Green Belt. LDC is not a Green Belt authority and would support greater clarity and direction on PDL within the countryside through the NPPF.</p>
<p>Question 22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?</p>	<p>The emphasis on brownfield development is supported, where this is within defined settlement boundaries. Outside of defined settlement boundaries, i.e. in the open countryside it would be inappropriate and open to potential ‘gaming’ in order to build housing in unsuitable locations.</p> <p>In areas of the countryside where there is scope, it needs to be balanced with supporting food production, not only to ensure domestic food security but also to meet targets for net zero.</p>

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<p>Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</p>	<p>LDC is not a Green Belt authority and therefore are not directly impacted on by this proposed change. However, we would observe that many areas currently designated as Green Belt are within the most sustainable locations for development in the country. The focus on land being defined as ‘grey belt’ is welcomed so long as it maintains a separation of individual settlements. This should be accompanied by a comprehensive review of designation across the appropriate sub-region to ensure biodiversity and climate mitigation functions are not adversely impacted as well as giving support to Local Nature Recovery strategies.</p>
<p>Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this. Nevertheless, the issue of land degradation is not only limited to Green Belt but is applicable to agricultural or other land in the countryside. We would encourage government to consider setting out additional measures to ensure that high performing agricultural land is safeguarded (in particular where it may be at risk of being lost to renewable energy development such as solar farms).</p>
<p>Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?</p>	<p>A strategic approach to Green Belt review across the appropriate sub-region is supported. This is one way in which the national housing need may be accommodated in the most sustainable locations.</p>
<p>Question 26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>
<p>Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>

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<p>Question 28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?</p>	<p>The sequential approach and the emphasis on brownfield development is supported so long as sites of significant biodiversity value are not compromised.</p>
<p>Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>
<p>Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>
<p>Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this. However, to create sustainable communities, development has to be more than just housing. We would suggest that this would only be applicable in appropriate locations, for example on the edge of established settlements.</p>
<p>Question 32: Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this. However, we would welcome government setting out its rationale for taking a different approach and ensuring its fairness under public sector equalities duty.</p>
<p>Question 33: Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>
<p>Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?</p>	<p>Local authorities should be able to establish their own housing mix proportions based on the characteristics of the plan area.</p>

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<p>Question 35: Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this. We do note that remedial costs associated with brownfield development will affect viability of developments and therefore this should be reflected in any target setting within the system.</p>
<p>Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this. We do note that opportunities to support higher levels of BNG should be explored within Green Belts.</p>
<p>Question 37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>
<p>Question 38: How and at what level should Government set benchmark land values?</p>	<p>The setting of benchmark land values at a national level is supported. This will help in assessing viability, provide greater certainty to developers and communities, and ensure greater community benefit from development. However, this should be undertaken nationally across all areas, and not just for Green Belt land. While we do not have strong views on the level at which it should be set, it does need to take into consideration the differing priorities of stakeholders and respond by not inadvertently hindering development.</p>
<p>Question 39: To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?</p>	<p>The approach to setting out benchmark land values and the setting of "Golden Rules" should be extended to all greenfield development and not just Green Belt land. This will support the delivery of much needed infrastructure in order to deliver the greatest level of benefits to local communities.</p>
<p>Question 40: It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?</p>	<p>The approach is supported, however, where a high level of unmet affordable housing need has been identified, we would welcome flexibility within the system to explore with development proponents any additional contributions.</p>

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<p>Question 41: Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?</p>	<p>The approach is supported. However, all developments should be subject to late-stage viability reviews when contributions below policy compliant level are initially agreed, not just those on Green Belt land. An independent government service for assessing viability proposals could lead to cost savings for local authorities and could support timely implementation of permissions, since very few local authorities retain such expertise in house, nor have the resources to commission such support. If government was not minded to pursue our above suggestion, then the costs of independent assessment of late-stage reviews should be borne by the developers.</p>
<p>Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered ‘not inappropriate’ in the Green Belt?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>
<p>Question 43: Do you have a view on whether the golden rules should apply only to ‘new’ Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>
<p>Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>
<p>Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?</p>	<p>We do not have any specific comments on this and would suggest that Green Belt authorities are best placed to answer this.</p>
<p>Question 46: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>As LDC is not a Green Belt authority, we have no further specific comments to add on this chapter. We are, though, making an observation that there is not the same level of focus and detail on land within the countryside which is not designated as Green Belt. Over half of our district’s area is covered by the South Downs National Park with vast amounts of the landscape outside the national park boundary contributing to the setting of the national park which is arguably is more ‘sensitive’ than Green Belt land which may no longer service its original purpose as it is re-designated as ‘grey belt’</p>

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Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?	Yes. The additional emphasis on social rent need is welcomed. It would be helpful for local plans to identify need and targets for the delivery of all affordable homes and include mechanisms to ensure the timely build out of schemes.
Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?	Yes. The removal of the 10% requirement is welcomed. Local authorities should be able to determine the housing mix appropriate for their communities. A clear definition of 'affordable' housing in the NPPF is required. Affordability should reflect average local incomes and support those on lower incomes to be able to rent or buy a home.
Question 49: Do you agree with removing the minimum 25% First Homes requirement?	Yes. The removal of the requirement is supported and welcomed. Local authorities should be able to determine the housing mix appropriate for their communities and should not be required to provide a standardised ownership product, particularly one that is unaffordable to those in need of affordable rented homes.
Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?	It is appropriate for the NPPF to retain this flexibility where it is an appropriate product.
Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	Yes, the benefits from mix tenure developments are well known, and this is supported.

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<p>Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?</p>	<p>Where authorities demonstrate a need for social rented homes through their evidence, the requirement for social rented homes should be specified in policy. Since the provision of socially rented homes has the highest impact on development viability, these should be prioritised in the affordable housing mix with all other tenure proportions delivered subsequently. The policy requirements for the provision of affordable housing could also be exempt from re-negotiation to avoid inadvertently increasing the perceived value of permissioned sites.</p> <p>The conflation of social rent and affordable rent should also be avoided. Where socially rented homes are secured through S106 it is often difficult to find a registered provider willing to bid for them due to the lack of grant funding for S106 purchases offered by Homes England. This needs to be remedied through the appropriate funding of affordable delivery, including that undertaken by local authorities.</p>
<p>Question 53: What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?</p>	<p>Large single tenure affordable schemes should not be supported as there is a risk that these could become the "sink estates" of the future. The need for a mix of tenures in all schemes is supported with a limit on the size of single tenure affordable schemes. The location and limit should be locally determined as local authorities hold the data on the need for affordable housing.</p> <p>Additionally, LDC urges this Government to end 'Right to Buy' as it continues to reduce the supply within the affordable housing stock.</p>

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<p>Question 54: What measures should we consider to better support and increase rural affordable housing?</p>	<p>The perennial question - as per the 2008 Taylor Review. There is no blanket approach for "rural areas". There are similarities in terms of poor access to infrastructure and public transport but there is a real difference between remote rural areas with poor road connectivity and long travel times to the nearest town and the settled countryside with good rail or road links in place. The approaches to both need to be distinct, rather than set out in national policy.</p> <p>The continued use of exception sites for affordable delivery in rural areas is supported. Locally, community land trusts are a popular vehicle to support such delivery. A national modest single plot self-build exception policy for those in affordable housing need could also be considered rather than the application of the rather cumbersome self-build register (see Shropshire Council or Mendip District Council LPP2).</p>
<p>Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?</p>	<p>Yes. The approach identifying the level of need for 'looked after children' should be set out in the NPPG.</p>
<p>Question 56: Do you agree with these changes?</p>	<p>Yes. The strengthening of support for community led development is welcomed.</p>
<p>Question 57: Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?</p>	<p>The widening of the definition to encompass other groups delivering affordable housing is supported. However, a clear definition of affordable rent is required. The level being set at a discount against market rents is often insufficient to make the rent affordable. The definition should reflect average local incomes and support those on lower incomes to be able to rent or buy.</p> <p>However, LDC does believe that more powers and funding should be made available to local authorities to deliver the affordable housing that local communities need in conjunction with increasing the emphasis on supply of affordable housing by other organisations.</p>



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<p>Question 58: Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?</p>	<p>Within rural authorities very few small sites are promoted to local authorities and site searches by officers over the past twenty years of land availability assessment requirements, mean that the supply of them has dwindled. The constant focus on PDL development has meant that the supply of these types of sites has also dwindled with only the toughest to bring forward remaining. Funds for CPO are not available, so these difficult sites continue not to come forward. There is very little that authorities can do to identify small sites where they don't exist, and inspectors are often sympathetic to authorities who are unable to demonstrate the existing 10% allocation criteria despite best efforts. Allocations need to be deliverable, and an unwilling landowner is a major barrier to delivery.</p> <p>The policy may perhaps be best applied to urban areas where there are more likely to be smaller sites, however the principle of development is likely to have already been established within these areas and the allocation process may be an overly resource intensive approach to securing such a land supply for SME builders.</p>
<p>Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?</p>	<p>Yes, we agree with removing reference to 'beauty' as this is subjective. However, well designed buildings also need to meet the highest achievable energy efficiency standards and be supported by the integration of low carbon approaches to energy generation. These requirements need to be made essential requirements in the national design code to ensure that new homes address climate change and can be heated and cooled at a cost that is affordable to the occupants.</p>
<p>Question 60: Do you agree with proposed changes to policy for upwards extensions?</p>	<p>The proposed changes are supported. However, this must be considered alongside the approach to density to ensure that infrastructure is able to support the number of new homes created.</p>
<p>Question 61: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No comment.</p>

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<p>Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?</p>	<p>In the absence of continued funding for Local Enterprise Partnerships and continued absence of national and regional planning, we are concerned that the changes proposed will require local plans to allocate sites for specific types of development that will be based on analysis of newly emerging markets for which trend data is not available, to be able to understand where that type of development may be required in the future. Without an overarching strategy to understand where this type of development is expected to be located, local authorities are unlikely to be in a position to justify such allocations at examination. There is no indication at this stage that Local Industrial Strategies will offer universal coverage of the country.</p>
<p>Question 63: Are there other sectors you think need particular support via these changes? What are they and why?</p>	<p>We would welcome further guidance on how the needs of low carbon and renewable energy generation and sustainable tourism can be supported.</p>
<p>Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?</p>	<p>The approach is supported in principle subject to the definition of the appropriate scale and appropriate consultation on the criteria against which such schemes would be considered under the NSIP regime.</p>
<p>Question 65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?</p>	<p>A direction may be appropriate in the cases of schemes of regional importance.</p>
<p>Question 66: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No comment.</p>

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<p>Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?</p>	<p>Yes. Reference to significant weight being placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development is supported. While LDC works with infrastructure providers to assess future infrastructure requirements through the Infrastructure Delivery Plan, the council does experience some difficulties obtaining appropriate information from some public service infrastructure providers. Delivery of housing at the levels expected will require infrastructure being in place either ahead or at the same time as the housing is delivered. This will require forward funding in most cases, as developer contributions cannot achieve it under the existing business models.</p> <p>In addition, the Environmental Audit Committee has recommended within the 2022 “Water Quality in Rivers” report, that Schedule 3 to the Flood and Water Management Act 2010 be enacted. Implementation would end the current automatic right to connect to sewerage systems and mitigate the accompanying risks of overloading sewer capacity. This change would allow the capacity of the waste-water system to be considered as a material consideration in planning decision making.</p>
<p>Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?</p>	<p>Yes. The added reference to post-16 places to support the delivery of this type of education provision is supported. Further reference to those with Special Educational Needs could also be included.</p>
<p>Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?</p>	<p>Yes. LDC strongly supports the principle of a 'vision-led' approach that would lead to significantly better outcomes than a 'predict and provide' approach, particularly as there is a need to plan development to better influence travel behaviours in light of climate change. Transport interventions that support and increase active travel options (beyond walking and cycling) are an important part of tackling the climate emergency, improving air quality and supporting healthy and active lifestyles.</p> <p>It is unclear from the text that has been added to paragraph 115 (new paragraph 113) what is meant by ‘in all tested scenarios’ and clarity on this would be welcomed. The vagueness of this could mean drawn out hearings at examination as parties seek to demonstrate that not all scenarios were tested. Consequently, this will potentially delay local plans.</p>

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<p>Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</p>	<p>LDC has strong links with East Sussex County Council's Healthy Places team and is working on local plan policies and planning approaches to better influence the creation of healthy communities. The inclusion of requirements for Health Impact Assessments for new development within the NPPF would be a relatively simple way for national planning policy to better support local authorities in creating health places.</p> <p>b) While there is evidence nationally demonstrating that hot food takeaways can be found in greater numbers in deprived areas, it is nevertheless easily challenged in court, and the focus on the location of HFTs is narrow and does not take into consideration sectors of the economy which have emerged to meet changing societal eating patterns, i.e. the emergence/proliferation of meal delivery companies such as Deliveroo, Uber Eats, etc as well as access to these by a tech savvy younger population.</p>
<p>Question 71: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>No comment.</p>
<p>Question 72: Do you agree that large onshore wind projects should be reintegrated into the s NSIP regime?</p>	<p>Yes. However, the term 'large' should be defined, and in decision making, the concerns of local communities should be acknowledged alongside local environmental considerations.</p>
<p>Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?</p>	<p>Yes, especially in instances where a climate emergency has been declared and a pathway to net zero needs to be achieved. Allocating sites or suitable broad locations, through the local plan, will give certainty to developers as to what is likely to be granted permission and where consent will be less likely to be looked on favourably. However, the removal of Paragraph 161 and substitution with “community led” in Paragraph 164b appears to give less support for community projects.</p>
<p>Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?</p>	<p>Yes. The council supports the restrictions on habitats being used for renewable energy development where the harm (through release of carbon) outweighs the benefits. Compensatory mechanisms should not be supported as an alternative to the restriction of development of these sites.</p>

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<p>Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?</p>	<p>Yes, for the reasons set out in the NPPF consultation documents. Smaller scale proposals should continue to be considered locally as they will be less costly with potentially faster delivery timescales which will help with meeting net zero targets.</p>
<p>Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?</p>	<p>Yes. The council supports this change so that smaller scale proposals can continue to be considered locally as they will be less costly with potentially faster delivery timescales which will help with meeting net zero targets.</p>
<p>Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?</p>	<p>The threshold should be set with regard to the energy generated rather than size/area covered by the scheme.</p>

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<p>Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?</p>	<p>We would welcome clarification as to whether this is an issue that should be considered locally or whether national policy should be relied upon. National standardisation of requirements, including submission requirements would improve submissions and speed up decision making.</p> <p>National policy should be used to require that all new build homes are provided with solar panels for renewable energy generation and energy security. In addition, the introduction of higher building fabric standards, approaches to on-site energy generation, water efficiency and surface water flooding through changes to building regulations as envisioned by the Future Home Standard should not be delayed beyond 2025. These standards could then be reviewed on a national basis to encompass the approach to climate mitigation and adaptation rather than requiring individual local authorities to justify more ambitious requirements in their local plans.</p> <p>We would also support the incorporation of the relevant aspects of the TCPA Healthy Homes Principles into an updated Future Home Standard in an effort to ensure that homes are built in a way that addresses climate mitigation and adaptation requirements and supports the health of occupants.</p> <p>An indication of the weight to be accorded to local nature recovery strategies in the decision-making process would also be a welcome addition to national policy.</p>
<p>Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?</p>	<p>There is a requirement for national standardisation to ensure decisions can be made in a timely manner which avoids duplication of effort across multiple local authorities and a proliferation of standards</p>

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<p>Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?</p>	<p>Yes. Footnote 7 in para 11 of the NPPF refers to 'areas at risk of flooding or coastal change' as 'a strong reason for restricting the overall scale, type or distribution of development in the plan area'. It would be helpful for greater clarification to be provided on how this relates to present-day and future flood zones to provide greater certainty around how flood risk is used to 'justify a lower housing requirement than the figure the method sets on the basis of local constraints on land and delivery', as identified in this consultation and as the basis for considering planning applications. This may require additional consideration around the policy and guidance on exception testing for flood risk.</p> <p>There is also a need for greater emphasis on the ability of local hydrological conditions to meet the challenges of climate change and the impact that additional development is having on natural drainage systems. This is likely to require policy changes in accordance with the recommendations of the Environmental Audit Committee in the 2022 "Water Quality in Rivers" report in order to future proof homes from localised flooding and to enhance riparian law.</p> <p>In addition, additional resource is required for the Environment Agency, as currently they are not able to provide appropriate and timely advice on flood risk issues to assist the speeding up of the plan-making process.</p>
<p>Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?</p>	<ol style="list-style-type: none"> <li>1. A long-term national strategy for relocation of affected coastal communities is needed in response to climate change.</li> <li>2. Any structure through which strategic planning is reintroduced in England should ensure that mitigations for climate change are a key delivery objective.</li> <li>3. Taking a stronger cross boundary approach to climate changes mitigation as is taken to unmet housing need. For example, solutions to flood risk may be better suited in places outside a local authority's boundary.</li> </ol>

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<p>Question 82: Do you agree with removal of this text from the footnote?</p>	<p>Yes, the first part of the footnote introduces a sequential approach to the development of agricultural land, promoting areas of poorer quality to those of a higher quality, thereby considering the poorest areas available first. The availability of agricultural land should not be considered on a local level. The need for food security is a national issue and availability of agricultural land should therefore be considered at the national level. A national exemption of Grade 1 and 2 BMV agricultural land from development should be set out in national policy with perhaps local determination of where development of Grade 3a agricultural land is appropriate.</p> <p>There is a need for a meaningful national land use strategy for issues of national importance such as food security, climate change mitigation and adaptation, biodiversity and nature recovery.</p> <p>The availability of data with regard to the Agricultural Land Classification is poor and may require verification if an exemption from development were to be enacted in national policy.</p>
<p>Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?</p>	<p>Availability of agricultural land should not be considered on a local level. Food production is a national issue and availability of agricultural land should be considered on the national level. A national exemption of Grade 1 and 2 BMV agricultural land from development should be set out in national policy with perhaps local determination of where development of Grade 3a agricultural land is appropriate.</p> <p>Opportunities for local communities to grow their own food through allotments should be expanded as well as encouraging the development of community gardens for food production.</p>
<p>Question 84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?</p>	<p>Yes - water infrastructure should be considered to be national infrastructure. The benefits often traverse local authority boundaries, and such infrastructure should be placed in the most appropriate strategic locations.</p>



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<p>Question 85: Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?</p>	<p>The Environmental Audit Committee has recommended within the 2022 “Water Quality in Rivers” report, that Schedule 3 to the Flood and Water Management Act 2010 be enacted. Implementation would end the current automatic right to connect to sewerage systems and mitigate the accompanying risks of overloading sewer capacity. This change would allow the capacity of the waste-water system to be considered as a material consideration in planning decision making.</p>
<p>Question 86: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>Provisions should apply to both wastewater infrastructure and water supply infrastructure.</p>
<p>Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?</p>	<p>Yes, we support the proposed changes. Setting out clear intervention criteria is welcomed. In addition, the proposal to give planning authorities an opportunity to put forward any exceptional circumstances is important as is setting criteria for the end of any designation which could include the LPA making satisfactory progress towards adopting their plan as well as actual adoption.</p>
<p>Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?</p>	<p>No. Including clear intervention policy criteria would assist the process.</p>
<p>Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?</p>	<p>The approach to planning fees is welcomed. We suggest that government should also be looking ahead to considering when to trigger net zero contributions to household changes/improvements.</p>
<p>Question 90: If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387. If Yes, please explain in the text box what you consider an appropriate fee increase would be.</p>	<p>The increase in planning fees is supported. Government should signal its intent to proceed to full cost recovery and move to that point in pre-announced stages. Research is required to demonstrate the "average range of actual costs". This approach could be supported through collaborative work with the RTPI, Planning Officers Society and the LGA.</p>
<p>Question 91: If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?</p>	<p>The increase in planning fees is supported. Government should signal its intent to proceed to full cost recovery and move to that point in pre-announced stages. Research is required to demonstrate the "average range of actual costs". This approach could be supported through collaborative work with the RTPI, Planning Officers Society and the LGA.</p>

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Yes	
No – it should be higher than £528	
No – it should be lower than £528	
no - there should be no fee increase	
Don't know	
If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.	
Question 92: Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.	<p>Applications for prior approval – these should attract the same fees as standard applications as they require a similar level of scrutiny.</p> <p>Administration of invalid applications – the entire fee is currently returned to applicants despite the resource that is required to scrutinise the applications for validity.</p> <p>Discharge of conditions – the current flat rate fee is wholly inadequate and does not cover the administrative costs associated with discharging conditions. The cost would need to increase substantially to reflect the level of planning officer and technical expertise input required to discharge individual conditions.</p> <p>S73 applications to vary consent - it is difficult to determine the level of resource needed which is officer time dependent. The complexity of the change increases the resource costs and fees need to reflect this. We suggest that a percentage of the original fee should be charged.</p>

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<p>Question 93: Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.</p>	<p>All types of application requiring consent under the planning system should attract a fee related to the cost of determining that application. All applications involve assessment, consultation and negotiation. If this assessment, consultation and negotiation were not required then the regulations should remove the need for unnecessary applications. This approach needs to ensure that the fees are set at a level that does not discourage applications for Listed Building or TPO works, reflecting the degree of custodianship involved for applicants.</p> <p>Fees should be set at a level which supports costs recovery.</p>
<p>Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?</p>	<p>Yes. This is a sensible approach to decentralisation that could take account of the circumstances within each planning making area.</p>
<p>Please give your reasons in the text box below.</p>	
<p>Question 95: What would be your preferred model for localisation of planning fees?</p>	<p>The Local Variation approach is supported provided the option to set all fees locally is included.</p>
<p>Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.</p>	
<p>Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.</p>	
<p>Neither</p>	
<p>Don't Know</p>	
<p>Please give your reasons in the text box below.</p>	

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<p>Question 96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?</p>	<p>The increase in planning fees is supported. Government should signal its intent to proceed to full cost recovery and move to that point in pre-announced stages. Research is required to demonstrate the "average range of actual costs". This approach could be supported through collaborative work with the RTP, Planning Officers Society and the LGA. The implementation of a fee setting regime that reflects full cost recover nationally but is able to be amended by planning authorities to reflect local circumstances, is supported. The full costs include the expertise of specialists in, for example, design, ecology, conservation, transport, water/flood managements and those that produce the local plan. There are also costs associated with democratic processes and procedures.</p>
<p>If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?</p>	
<p>Question 97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?</p>	<p>Costs associated with the democratic process and procedures related to the operation of the planning service.</p> <p>Enforcement and Breach of Condition – both the administration and processes involved are resource intensive.</p>
<p>Question 98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?</p>	<p>In accordance with our response to Question 93 all types of application requiring consent under the planning system should attract a fee related to the cost of determining that application.</p>

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Question 99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.	The recovery of full costs for host authorities is supported in accordance with our response to Question 93. The scope to waive fees is also supported.
Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?	No comment.
Question 101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.	No comment.
Question 102: Do you have any other suggestions relating to the proposals in this chapter?	No comment.
Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?	Please see response to Question 104.

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<p>Question 104: Do you agree with the proposed transitional arrangements?</p>	<p>While we welcome the new draft guidance on brownfield first development and including homes for looked after children, council tenants and increasing density, the current changes being consulted upon will be the fourth time that the NPPF has changed since work on preparing our local plan started. This has inevitably impacted on our timeline for preparing the local plan and delayed giving certainty and clarity to both our local communities and to the development sector. The delays, mean that we are exposed to a longer period of speculative development.</p> <p>Our communities have already faced massive housing growth in the last 10 years, they have given their views to us on our policies and on the housing need loudly and clearly. The proposed changes to the Standard Method resulting in a higher need means that we are having to revisit our spatial strategy and sites and delay our Regulation 19 consultation to undertake a further Regulation 18 consultation. This is contrary to the governments stated objective of having local plans delivered quickly under a universal plan coverage system by end of December 2026.</p> <p>We would welcome the expansion of the offer of financial assistance to all local authorities which have undertaken Regulation 18 consultations though which they have identified their housing need and housing requirement, rather than restricting it to only those authorities that have reached Regulation 19 stage.</p>
<p>Question 105: Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>The draft NPPF consultation makes no changes to infrastructure provision, we know our public transport is poor in our rural areas, our roads are already too busy and unsafe, concrete surface run-off during heavy downpours is already a major challenge creating downstream flooding and sewage back-up and our doctors and dentists surgeries and schools are all full: more houses without the infrastructure first is no longer acceptable.</p>

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Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

No comment.