

Response ID ANON-1R1Y-UKTG-8

Submitted to Levelling-up and Regeneration Bill: Reforms to National Planning Policy
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Introduction

A Personal dataThe following is to explain your rights and give you the information you are be entitled to under the Data Protection Act 2018.Note that this section only refers to your personal data (your name address and anything that could be used to identify you personally) not the content of your response to the consultation.1. The identity of the data controller and contact details of our Data Protection Officer The Department for Levelling Up, Housing and Communities (DLUHC) is the data controller. The Data Protection Officer can be contacted at dataprotection@communities.gov.uk 2. Why we are collecting your personal data Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.3. Our legal basis for processing your personal dataThe Data Protection Act 2018 states that, as a government department, DLUHC may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.4. With whom we will be sharing your personal dataDLUHC may share your personal data with external organisations, for purposes relating to this consultation, including analysis of responses. Any data shared with organisations outside of DLUHC will be anonymised where possible.5. For how long we will keep your personal data, or criteria used to determine the retention period.Your personal data will be held for two years from the closure of the consultation.6. Your rights, e.g. access, rectification, erasure The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:a. to see what data we have about youb. to ask us to stop using your data, but keep it on recordc. to ask to have all or some of your data deleted or correctedd. to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law. You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113.7. Your personal data will not be sent overseas.8. Your personal data will not be used for any automated decision making. 9. We use a third-party system, Citizen Space, to collect consultation responses. In the first instance your personal data will be stored on their secure UK-based server. Your personal data will remain on the Citizen Space server and/or be transferred to our secure government IT system for two years of retention before it is deleted. Please confirm that you have read and agree to the privacy notice

Please tick to confirm:

Yes

B What is your name?

Name:

Rosie Pearson

C What is your email address?

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D What is your organisation?

Organisation:

Community Planning Alliance

E What type of organisation are you representing?

Interest group or voluntary organisation

If you answered "other" please provide further details:

Chapter 3

1 Do you agree that local planning authorities should not have to continually demonstrate a deliverable five year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than five years old?

Yes

Please set out the reasons for your answer:

This is an important move to protect communities from speculative development and to reinforce local plans.

2 Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

Yes

Please set out the reasons for your answer:

This is an important move to prevent speculative development

3 Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on?

Yes

Please set out the reasons for your answer:

This is an essential change. Councils which over-deliver should not be forced to permit additional homes when they are already over-delivering. Furthermore any historic oversupply in previous plan periods will feed back into the current Standard Method, leading to even greater potential oversupply being "required" by the equation based on an increase in households. This feedback loop should be removed.

Or is there an alternative approach that is preferable?:

4 What should any planning guidance dealing with oversupply and undersupply say?

Answer:

The question of oversupply depends so much on the original calculation of "need,, which comes back to having a much more sensible Standard Method with constraints included at the start, and using uptodate projections. Many local authorities will appear to have underdelivered against the 2014 projections with no constraints, but will be shown to have oversupplied if the uptodate projections were used with Green Belt, National Parks and other constraints taken into account.

5 Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

Answer:

"Neighbourhood Plans take many years to prepare, many hours of volunteer time, and usually financial grants. There should be a presumption in favour of Neighbourhood Plans. It is a very good first move to see that paragraphs 14c and d are to be removed. We recommend that paragraphs a and b are also removed. There should be no caveats or ifs and buts. If there is a NP, it should count. An emerging Neighbourhood Plan should also be given weight, requiring a change to paragraph 50 in the NPPF so that instead of ""Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan."" it becomes, ""will be supported."" Trust in the planning system is very low, as demonstrated by the 70% of the 900 respondents to our Trust in Planning survey last autumn saying they did NOT trust their council when it comes to planning decisions. Giving NP's a greater standing would be a great help in regaining some of that trust in the planning system. "

Chapter 4

6 Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

Yes

Please set out the reasons for your answer:

Yes. The new emphasis on sufficient housing, sustainability, and local plans is to be welcomed. We would like to see more on what the homes that communities 'need' actually means. There must be a mechanism to ensure that a local plan delivers for need instead for a notional national target. While, we are pleased to see many of the changes proposed, it is imperative that councils are held to delivering on the findings of their Strategic Housing Market Assessments - and not to the whims of developers. In addition, given the welcome emphasis placed on communities in the accompanying NPPF 'prospectus' (which has 121 mentions of community/communities) we would like to see wording in the NPPF, or in guidance, which notes that a local plan must be prepared under a system of 'Engage Deliberate Decide'. This will lead to faster and less acrimonious adoption of local plans which do what the NPPF requires them to do: reflect the views of the community. At the moment, 94% of respondents to our Trust in Planning survey felt that instead their planning authority operates the Decide Announce Defend model - which leads to protracted battles instead of co-planning. Local plans should be made WITH local people.

7 What are your views on the implications these changes may have on plan making and housing supply?

Answer:

The development sector has become a little hysterical and it will be worth reading their responses with a pinch of salt. Plan-making will not stop because of the current consultation. If councils are pausing their plans, it is generally because of the uncertainty, not because they do not wish to have a plan. Local Plans are still essential. What the changes will do, is give councils time to focus on plan-making, instead of defending appeals. And they will be able to plan for the right number, not an arbitrary number imposed from above. That said, what the changes will not do is address the acute problem of need for those in the sub-market, for whom planning policy and the planning system do nothing. The problem of housing waiting lists remains unaddressed - and that, in our view, is where the focus needs to be. There is no issue with the supply of market homes

8 Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs?

Yes

Please set out the reasons for your answer:

The policy should allow local authorities to set out what they believe the constraints to be and should allow room for manoeuvre. If councils seek to build more housing than their Standard Method starting point requires, they must provide evidence of how this is sustainable and demonstrate that it will not cause harm to the environment and lead to more unsustainable development under the presumption (para 11). Braintree District Council is a good example. It chose a number nearly twice the required number and is now facing numerous appeals because it is unable to meet its five year supply target. That was predicted and, in future, should be tested. There is no point having a local plan if the target is undeliverable. In addition, it must be noted that areas outside a Green Belt can become the target of 'leap frogging' developers and, whilst being often more beautiful and ecologically important, do not receive protection. This leapfrogging would be minimised if the so-called housing need was lowered due to the constraints of the Green Belt, rather than just passed on to a neighbouring authority as is currently the situation. National Parks should be also specified in the body of the text to clarify that they are absolved from meeting market housing need, and that the Standard Method housing need should be lowered accordingly, rather than passed on to any part of the district outside the Park boundaries. This is particularly relevant as the affordability multiplier in the Standard Method is increased by the very presence of a National Park, erroneously inflating the so-called need even further.

Are there other issues we should consider alongside those set out above?:

9 Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out-of-character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

No

Please set out the reasons for your answer:

Yes to the Green Belt review; Yes to past over-supply and Maybe to density. The wording around densities perhaps needs finessing or explaining. Gentle density or 'Goldilocks' density MUST be encouraged. It reduces land take and creates critical mass for services and public transport, whilst also ensuring that an development is walkable or good for cycling. It is our understanding that its inclusion at this point of the NPPF is a reaction to inappropriate tower blocks being built in suburbs. Clarification would be good. CPA chairman's blog on 'Goldilocks' density can be read here: <https://www.linkedin.com/pulse/seeking-goldilocks-density-rosie-pearson>

10 Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out-of-character with the existing area?

Please set out the reasons for your answer:

This is perhaps best addressed through design codes, neighbourhood plans and consultations

11 Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?

No

Please set out the reasons for your answer:

Definitely not. It is imperative that plans are justified. There needs to be a basic sense check and evidence to support a plan, plus the ability for other stakeholders to challenge a strategy

12 Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation?

Indifferent

Please set out the reasons for your answer:

If no, which if any, plans should the revised tests apply to?:

13 Do you agree that we should make a change to the Framework on the application of the urban uplift?

Not Answered

Please set out the reasons for your answer:

The desire for brownfield first and greater densities is one that should be applied across the entire NPPF. The urban uplift is problematic, being a) arbitrary and b) likely undeliverable. If the right housing need starting point was applied in the first place (i.e based on latest ONS/Census statistics and not using the Standard Method, which is created on the false myth that higher targets make housing affordable) then the urban uplift would not be required in the first place. At the very least the Standard Method should be updated to the latest projections, ground truthed by the Census 2021 when available. This would demonstrate that the so-called need is lower and the urban uplift (on those newer figures) more achievable.

14 What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

Please set out the reasons for your answer:

Sell the benefits of density - what does it mean, what does it look like, why is it better than car-dependent sprawl, why it doesn't mean tower blocks, why it still allows green space (in fact more public green space than in urban sprawl), why it creates communities, why it provides critical mass for public transport, why it is better not to have to drive everywhere etc etc. Density is very misunderstood. Lots more positive examples are required, such as Victorian or Georgian terraces, all with gardens, yet with very high density.

15 How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

Please set out the reasons for your answer:

If the urban uplift is to remain then neighbouring authorities will have to understand what impact that has on commuter flows, use of services etc The urban uplift should NOT be passed onto neighbouring rural authorities, as this completely undermines the case for regeneration and development centred around transit and facilities.

16 Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply?

No

Please set out the reasons for your answer:

There should be no land supply requirement for two years to incentivise planning authorities to adopt a plan and give them breathing space to do so

If no, what approach should be taken, if any?:

17 Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

Indifferent

Please set out the reasons for your answer:

No comment

18 Do you support adding an additional permissions-based test that will 'switch off' the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

Yes

Please set out the reasons for your answer:

Yes, because this reflects the fact that local authorities have no control over development once a site has been allocated in a plan. It could be stretched even further and it could count allocations, not just permissions. Local authorities have no control over developers putting in applications.

19 Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

No

Please set out the reasons for your answer:

Better still - the 'switch-off' should apply at 100%.

20 Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

Please set out the reasons for your answer:

We suggest counting allocations, not just permissioned. If you just count permissions, then developers will argue that some are not deliverable and they need ever more permissions in locations of their choosing, and not in accordance with the Local Plan. Sites should be deemed to be deliverable to be included as an allocation in the first place.

21 What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

Please set out the reasons for your answer:

no comment

Chapter 5

22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions?

Yes

Please set out the reasons for your answer:

Yes. We welcome the Levelling Up White Paper commitment: "increase the amount of social housing available over time to provide the most affordable housing to those who need it" Social rent must be given the highest possible focus in policy. We would recommend the discontinuing of 'First Homes' and instead an insistence in policy that social rent homes are provided in all developments as a first priority, before other types of 'affordable homes', which are generally not!! Preventing developer viability renegotiations is essential and we await the Single Infrastructure Levy consultation with interest.

If yes, do you have any specific suggestions on the best mechanisms for doing this?:

23 Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

Indifferent

Please set out the reasons for your answer:

Demographic changes suggest that the largest increase in population is in older age groups. Downsizing options could be encouraged in the Framework.

24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

Answer:

We believe it is essential to encourage small sites to be brought forward and for SME builders to be supported

25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

Answer:

Ask LPAs for their evidence about how paragraph 70 is being applied (or whether it is being applied). Make annual reporting about para 70 mandatory

26 Should the definition of "affordable housing for rent" in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

Yes

Please set out the reasons for your answer:

Yes. We welcome the fact that almshouses are mentioned. Almshouses are the ultimate social home! Genuinely affordable, meeting local need and held in perpetuity

27 Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

Answer:

The main blocker for exception sites is land value. Land owners do not wish to put forward a site at existing use - and why should they? As a first step, it would be interesting to look at the viability of some case studies, to understand what can and cannot be delivered. In addition, community groups will likely need 'seed funding' or technical support - perhaps something that Homes England can provide?

28 Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

Answer:

Access to consultants and training. As above, seed funding for consultants and/or advice from e.g Homes England or local authority. Case studies also beneficial to explain what can and cannot be achieved

29 Is there anything else national planning policy could do to support community-led developments?

Answer:

For truly, community-led developments, the plan-making system will have to change. Firstly, we need to shift, as above, from Decide Announce Defend to Engage Deliberate Decide. Secondly, there should be no call for sites until after the Deliberate phase of engagement. Thirdly, communities must be asked what sites they might put forward for development BEFORE a formal call for sites

30 Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?

Yes

Please set out the reasons for your answer:

Yes, in principle, although it will be difficult to enforce and to prevent developers presenting applications under subsidiary companies names to evade the test. A positive approach as well as a negative approach should be taken - examples of good development taken into account. Councils should be allowed to veto developments when a developer has previously not delivered on promises or required enforcement action

If yes, what past behaviour should be in scope?:

Not delivering on policy commitments eg affordable. Cases where enforcement action has been needed e.g wildlife crimes, hedgerows or trees removed.

31 Of the two options above, what would be the most effective mechanism?

Option 2

Please set out the reasons for your answer:

No comment - one for the lawyers! Although for consistency with the question below, option 2 may be better

Are there any alternative mechanisms?:

32 Do you agree that the three build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly?

Yes

Please set out the reasons for your answer:

Yes, agree. Might be worth ensuring that developers tie their answer in to the Authority's SHMA so that the right mix for local needs is delivered, rather than a diverse mix that suits the developer.

Do you have any comments on the design of these policy measures?:

Chapter 6

33 Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

Yes

Please set out the reasons for your answer:

Very simple - we need to be proud of our towns and villages as they grow. At the moment, the vast majority of developments are bolt-on, unattractive and, to be frank, stick out like a sore thumb.

Placemaking must be emphasised - fifteen minute neighbourhoods etc

34 Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places' to further encourage well-designed and beautiful development?

Yes

Please set out the reasons for your answer:

35 Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

Yes

Please set out the reasons for your answer:

Yes - and design requirements must go beyond just the visual look of the dwellings proposed and include gentle/goldilocks density, place-making, health outcomes and active/public transport outcomes

36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing Framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes?

No

Please set out the reasons for your answer:

It is extremely unhelpful and should be dropped. Density is much more than a mansard roof. The entire density debate needs to be a national one. As we have set out in previous questions: density brings many, many benefits. <https://www.linkedin.com/pulse/seeking-goldilocks-density-rosie-pearson>

If no, how else might we achieve this objective?:

By including mansard roofs as just one of many tools in a new Density Toolkit for local planning authorities.

Chapter 7

37 How do you think national policy on small scale nature interventions could be strengthened? For example in relation to the use of artificial grass by developers in new development?

Answer:

Specifically, there should be an outright ban on the sale of artificial grass, full stop. And it must certainly be banned in all public areas of a development.

More generally, small-scale nature interventions will require a PR campaign to shift the mentality that nature is scruffy.

Could the planning system mandate nature zones in EVERY garden, with developer marketing materials explaining why there is a wildflower corner or a bee patch or a bird box.

Policy must do more to protect existing trees, ponds and hedgerows.

38 Do you agree that this is the right approach to making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best and most versatile agricultural land?

No

Please set out the reasons for your answer:

It is good to see recognition of this important topic BUT it needs to be given far greater emphasis. The food production value of high value farm land needs to be contained within the body text of the NPPF as a footnote and needs to be a heavily weighted policy - presumption in favour of refusal on best and most versatile land, with applicant needing to demonstrate why the land can be used for development rather than the other way round.

39 What method and actions could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

Answer, including any supporting information:

We very much welcome this question.

Local plans must be evidence-based and this must particularly apply to Sustainability Appraisals. Professional judgement must not be allowed to over-ride this need for evidence.

There must be base level measurements for ALL relevant parameters and modelling of different outcomes under different scenarios.

Gtr Cambs went a little way towards doing this: Greater Cambridge Local Plan strategic spatial options assessment Implications for carbon emissions Nov2020 (greatercambridgeplanning.org)

40 Do you have any views on how planning policy could support climate change adaptation further, including through the use of nature-based solutions which provide multi-functional benefits?

Answer:

The NPPF and 2023 DEFRA Land Use Framework must integrate, and the NPPF must recognise the LUF when complete. The single biggest impact on reducing emissions (rather than just mitigating for their effects) is to choose sustainable locations for development in the first instance. By requiring higher density and by reducing car use, more land will be available for nature-based solutions.

Chapter 8

41 Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

Indifferent

Please set out the reasons for your answer, including any views on specific wording changes to the existing paragraph:

No comment but we believe that solar must be enforced on all new rooftops (domestic, public and commercial) and on car parks (as in France). We support community energy schemes, and believe that energy is best produced on a small-scale near where it is needed.

42 Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

Indifferent

Please set out the reasons for your answer, including any views on specific wording changes to the existing paragraph:

Community support will need defining and local authority support must not be considered community support. Parish councils must be asked their opinion and a majority of supportive consultation or planning application responses be required. With regards to paragraph c, any original conditions for return of the site to previous use must be honoured, unless there is community support (see above) for renewal of/continuation of the planning application

43 Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework?

Not Answered

Please set out the reasons for your answer, including any views on specific wording changes to existing footnote 54:

Is the footnote reference incorrect? Nevertheless, the changes are fine. Community support will need to be carefully defined and local authority support must not be considered community support. Parish councils must be asked their opinion and a majority of supportive consultation or planning application responses be required.

Do you have any views on specific wording for new footnote 62?:

44 Do you agree with our proposed new Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

Yes

Please set out the reasons for your answer, including any views on specific wording changes to the proposed new paragraph:

Add wording to give weight to same in new buildings

Chapter 9

45 Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system?

Yes

Please set out the reasons for your answer:

If no, what alternative timeline would you propose?:

46 Do you agree with the proposed transitional arrangements for plans under the future system?

Yes

Please set out the reasons for your answer:

If no, what alternative arrangements would you propose?:

47 Do you agree with the proposed timeline for preparing neighbourhood plans under the future system?

No

Please set out the reasons for your answer:

ALL caveats should be removed. If there is an emerging NP it should be given weight and if there is an adopted local plan it should not matter about the local authorities five year supply or whether a NP is new or old. For NP's to be trusted and of use, the rules must be very simple and must favour NP's: a presumption in favour of NP's, please!

If no, what alternative timeline would you propose?:

48 Do you agree with the proposed transitional arrangements for supplementary planning documents?

Indifferent

Please set out the reasons for your answer:

If no, what alternative arrangements would you propose?:

Chapter 10

49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

Yes

Please set out the reason for your answer:

As community groups, there are many benefits to a more standardised system of policies in some situations. It will be much simpler and easier in the plan-making process. By way of example, when our Chairman was campaigning in north Essex, there were four, linked local plans under broadly the same examination process, yet each had separate wording. It would be much easier as a starting point if local authorities were obliged to start a local plan based around the NPPF, so long as they are allowed to diverge from it where they want to above and beyond. Examples of best practice and/or model policies would be another method. There needs to be some control over NDMPs just being changed by the SoS, or some criteria which must underpin any changes.

50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

Answer:

See q 49

51 Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

Yes

Please set out the reason for your answer:

52 Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

Answer:

It would help to enforce net zero commitments and other climate & environment positive policies if these were set as standard, with LPAs' allowed to diverge if they wish to go above and beyond.

Chapter 11

53 What, if any, planning policies do you think could be included in a new Framework to help achieve the twelve levelling up missions in the Levelling Up White Paper?

Answer:

Policies that prioritise public and active travel and deprioritise cars. Policies that reduce pollution (air and water). And housing policies that prioritise need over demand - by changing the Standard Method for a new approach (including using up-to-date projections and constraints)

54 How do you think the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?

Answer:

55 Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

Not Answered

Please set out the reason for your answer:

Yes, see answers re density above. The government should change the VAT rules that encourage greenfield over brownfield.

56 Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups feel safe in our public spaces, including for example policies on lighting/street lighting?

Indifferent

Please set out the reason for your answer:

Chapter 13

57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

Answer:

It would always be helpful if local authorities have to refer to how a local plan or a planning application meets with (or does not meet with) NPPF policy in a standard format. In addition, Community Planning Alliance is involved with the Quality of Life Foundation's panel that is looking at creating a code of conduct for community engagement.

58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

Answer: