	Question	Response
1	Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?	Yes - agree that LPA should not have to continuously demonstrate a deliverable 5-year HLS for up-to-date plans. However, regardless of the age of the local plan, demonstrating the 5 y HLS should only be used as a positive monitoring tool that actually addresses the issue of housing delivery and supply and does not punish local communities. This is because plan making, strategic scale developments and infrastructure may take significantly more time that the 5 years rolling period - many plans are already within the first 5 years or more on adoption. Local planning authorities have limited market intervention tools (if any) to boost housing delivery rates other than ensuring that planning permission has been approved and infrastructure is being delivered. The first 5 to 10 years of plan making often involves strategic scale sites which require longer lead times to ensure necessary strategic infrastructure and phasing is joined up. Arun's adopted local plan (adopted in 2018 covering 2011-2031) portfolio of strategic sites first started to obtain outline consents in 2017 (8 years into the plan period) and has only recently achieved outline or detailed consents across all strategic sites in 2022 (some 12 years into the plan period). As a consequence, Arun's 5-year housing land supply failed in 2019 when the plan was only 2 years old. The assumption is that lead times - from site allocation to outline, reserved matters consent and discharge of conditions - is a key barrier to deliverable housing. Whilst local authority resource capacity may sometimes slow the consents regime, rather than adding to the burden with bringing forward an additional housing buffer, more resources should be provided. Arun has significantly supplied significant housing permissions. While monitoring 5-year housing supply is, indeed, important – a more effective policy approach the Government may wish to consider is to use a 5 y HLS monitoring requirement to establish a league table – in order to identify the need for positive intervention in those areas struggling to unlock local delivery issues. Such interventions might include positive enabling mechanisms e.g. setting up a local delivery agency to tackle the issues, streamlining financial grants and forward funding and setting spatial

		priorities for agencies and providers such as Homes England and National Highways. There are a number of reasons for this:- • A Local Plan quickly becomes redundant / out of date <u>even when less than 5 years old</u> - but the local plan is setting a sustainable framework with supporting infrastructure, for the next 15-20 years; • For example at Arun DC, the Local Plan adopted 7 years into its housing trajectory, is less than five years old but due to the housing land supply issues it is deemed out of date prematurely due to not delivering as many homes per annum that was in the housing requirement • In Arun there are deliverable consents for over 4,100 deliverable dwellings (over 6,000 in total) yet around 550 dwellings per annum over the last 20 years i.e. running at 50% of the annualised Local Plan requirement) and more recently, modest (rising to around 620 dpa since 2016 partly explained by delivery of older strategic sites in the past, and via enabling affordable housing delivery in some years). In only two of the past 20 years has delivery exceeded 700 dwellings/year. • The above compares to an annualised Local Plan requirement of 1,000 dpa. • The rolling 5 yr HLS metric is a punitive measure and does not address the housing supply issues. • A buffer and NPPF para 11d and 14 actually make the delivery and supply matters worse. • This undermines sustainable development and the reputation of the plan making system. • This leads to pressure for intensification on existing allocations and the infrastructure deficit becomes a 'vicious circle'. • LPAs are not generally housing providers and while planning consents are put in place – some with long lead times (particularly, Strategic Development) authorities can do little to control the development market or developers with land banks and unimplemented consents. • Even where plans are more than 5 years old there may be long lead times for strategic development and the 5 yr HLS metric penalties will continue to undermine strategic delivery and sustainable development. As long as the housing requirement set out in its strategic policies has been rigorously tested and passed examination and is found sound - this should be the only litmus test, while monitoring a rolling 5 yr HLS will be important to signal need for positive intervention.

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 – adding a significant buffer in each test is not addressing the issue but adding to it - for the reasons included in answer to Q1 above – buffers should not be required as part of 5YHLS calculations because it increases unnecessary requirements on LPAs to deliver unrealistic and unsustainable numbers of housing beyond planned infrastructure – and is just a punishment for persistent under delivery. This results in greater difficulty for a LPA to catch up with supply delivery as the requirements get greater every year - if the Sedgefield approach is used due to the need to add on the previous years under delivery since the adoption of the plan. The barriers to delivery may hinge on the ability of the local market and number of provider outlets to compete for sales from the local market, forming a natural absorption rate of housing sales. In addition the build out rates may be dependent on the delivery of infrastructure which has been matched to the planned housing rates/trajectories. Adding a buffer only adds to the difficulty and does not address the real problems of housing delivery and risks unsustainable development and community resistance. Climate change is now too important to let this continue.
3	Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?	Yes – the role of the Local Plan is to look at the totality and distribution of development and to match it to the necessary supporting infrastructure that can be afforded by developers and to achieve a sustainable development strategy. If there is an oversupply early in the plan period – a result of planned development and windfall – this will need to be addressed later in the plan period to ensure that infrastructure mitigates development individually and cumulatively (see answer to Question 6 below). If however, the government retains the 5 yr HLS (as proposed to be amended) with the ‘presumption’ – further clarity would be helpful over the role of under supply (i.e. the backlog) or over supply and the application of the SHM for plans that are less than 5 years old but which material policies are deemed out of date where unable to demonstrate a 5 yr-HLS or as a result of local policy triggers (i.e. Paragraph 031 Reference ID: 68-031-20190722).

4	What should any planning guidance dealing with oversupply and undersupply say?	That any local plan update needs to be based on sound monitoring and managing approach to supply and delivery across a 15 - 20-year period i.e. not just a rolling 5 year HLS - because of the need to match development to phased infrastructure planning and to ensure that development is sustainable across the economic cycle. Undersupply should be seen in this context and a rolling 5 year monitoring metric should only be used to identify need for intervention and positive policies to try to recover delivery – not penalties that make delivery more difficult and unsustainable. Oversupply may help with the Duty to Cooperate with other neighbouring authorities offering scope for oversupply to count towards unmet needs from neighbouring authorities. However, the Standard Housing Methodology uses the housing affordability uplift to factor in under delivery of housing – this is a more effective way to address local underperformance of the economy and housing delivery because it is used to set the plan requirement (subject to any constraints that may apply) and this in turn is used to test the sustainability credentials of development as well as the necessary supporting infrastructure and viability of development to deliver it.
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?	Yes – This is very much welcomed and will provide greater certainty for neighbourhood planning and will in turn strengthen the development plan. Neighbourhood Development plans are part of the statutory development plan and should be treated equally with the Local Plan in terms of housing delivery and supply. As set out under Q1 above – local communities and authorities should not be punished for under delivery.
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	Yes - agree that additional text is needed to provide clarity that homes should be provided “sufficiently” and in a “sustainable manner” via “up-to-date plans” (paragraph 1). This should be a ‘golden thread’ throughout the document (where appropriate) and should include reference to the fact that climate change is here and there is a ‘Climate Emergency ‘also at the forefront of the NPPF as an important context for delivering housing supply sustainably. This is now too important and issue to allow perceived short term supply issues to override the sound policies in a statutory

	and other development our communities need?	development plan purely based not having a 5-year HLS. Applying penalties and buffers just makes delivery worse (particularly for Strategic developments that have long lead times which then find the planned infrastructure capacity has been taken up and therefore additional design and costs are incurred with significant delays to delivery as statutory bodies and agencies may object) or unstainable developments are permitted on appeal. The emphasis in plan making should be on:- • A realistic housing trajectory supported by necessary infrastructure within climate and environmental constraints • The range of site sizes and categories of need to address market delivery should be more rigorously applied though Local Plan examination and recognising that strategic scale development takes time to deliver • A stronger windfall allowance should be made in any trajectory at the beginning, to ensure that infrastructure is planned to meet all cumulative needs that will arise over the plan period.
7	What are your views on the implications these changes may have on plan-making and housing supply?	The clarifications are helpful concerning the weight to be given to the status of the SHM as a starting point and how it may be tested. However, it should also be clear that it remains the starting point for consistency (being based on published ONS population and HH projections) and that any alternative needs forecasts are derivatives from this otherwise comparative evidence from neighbouring authorities will become more complex and lead to debate and delay – which the SHM was introduced to remove. Clarification of exceptional circumstances will be necessary. The tempering of projections using latest Census 2021 data is welcome.
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? Are there	There is a distinction between testing exceptional demographic components of housing need for authorities with demographic profiles that differ from the norm, compared to testing exceptional environmental and infrastructure (including viability) capacity constraints. Both of these considerations may, however, impose limits on setting a housing requirement. For example. Arun has an exceptional ageing demographic (i.e. 36% of residents are aged over 60 compared to other areas) with a large retirement population, many attracted from elsewhere, as house

	other issues we should consider alongside those set out above?	prices are lower in Arun compared to neighbour areas. However, Arun has acute local affordability issues, especially for younger earners because of low average wages such that these residents are unable to compete for market housing with more affluent households (trading down) coming from elsewhere. Providing more market housing will simply exacerbate this issue and fuel migration. Breaking down the housing need into specific tenures that benefit local residents in a fairer and more balanced way is therefore welcome. Other criteria may therefore need to consider local economic strength or weakness and affordability issues, levels of in migration, relative land and house prices and evidence on housing absorption rates – including any national collated research. Once need is established, in setting an appropriate target there may be other exceptional circumstances.
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. Green Belt is a policy instrument aimed at delivering the 5 specific purposes of designation. Climate change and sustainable development are not explicitly included. The national policy position should be reviewed to ensure that this omission is addressed because there is a climate emergency and need to reduce carbon emissions – the considerations of which may in certain circumstances, override the 5 current purposes of the Green Belt.
10	Do you have views on what evidence local planning authorities	Considerations could include:- • Average densities and building hights within a character area

	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?	• Design codes • Appeals
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?	Yes. This may reduce the burden and complexity/extent of evidence required.
12	Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?	While it may be appropriate for some advanced plans to be subject to the revised approach – there may be contested matters that are important for stakeholders that then do not get considered - which is not supported. Further, some aspects of the changes being consulted on may need further revision in the light of consultation comments or may not be taken up in the final changes.
13	Do you agree that we should make a change to the Framework on the application of the urban uplift?	This authority is unable to answer this question as it is not one of the 20 largest towns and cities.

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?	This authority is unable to answer this question as it is not one of the 20 largest towns and cities. However, it would help to understand how the department has identified that the areas can actually accommodate such a large increase e.g. is there national collated evidence that land is actually available to accommodate the scale of development proposed e.g. Brown field Land Register etc. If no source has been used, it is not clear if the areas could potentially accommodate the figures proposed.
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?	This authority is unable to answer this question as it is not one of the 20 largest towns and cities.
16	Do you agree with the proposed 4-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? If no, what approach should be taken, if any?	A 5 year or 4 year rolling land supply is not supported as a potential test as currently applied under the 5 yr HLS but rather that this should just be a monitoring requirement and trigger for positive intervention when reviewing land supply see answer to Question 1 above. For more advanced Local Plans see answer under Q 12 above.

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?	No – see answer to Question 12 above.
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. This is more reflective of recognising that LPAs have limited tools to boost housing delivery rates other than ensure that plans are up to date and lead times for strategic and small-scale developments achieve planning permission in good time. However, adoption of the permissions-based test should not be applied as a penalty with the 'presumption' but indicate that positive interventions should be applied – see answers to Question 1 above.
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?	Yes – but see answer to Q 1 and Question 18 above. Further, the proposed threshold of 115% is arbitrary in that it does not account for the differing circumstances that will exist from authority to authority.
20	Do you have views on a robust method for	Maintain the current definitions.

	counting deliverable homes permissioned for these purposes?	
21	What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?	The HDT and 5 yr HLS tests are not supported as currently applied. These should be indicators of where positive intervention is needed - the whole premise that delivery can be improved just by adding a penalty requiring increased supply (20% buffer) or undermining the sustainable policies of development plans is flawed. It does not address the problem but adds to it – see answers to Q 1 above.
22	Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?	The components of population change, household and housing mix requirements are addressed via the Strategic Housing Market Assessment (SHMA). Any strengthening of the national policy requirement for specific needs to be addressed via appropriate tenures in Local Plan evidence and policies would be welcomed.
23	Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?	Yes, the reference to older peoples housing is welcome see also answer to Q 22 above. Agree could be amended to make clearer to support the supply of older people's housing. This is because in some areas such as Arun, there is a high demand for older peoples housing needs, and it is important to sustainably plan for their needs within the wider community. Reference could also be made in an appropriate paragraph, to the importance of inclusive and sustainable design with good access and proximity to health care provision and links to green infrastructure to enable a therapeutic environment to be utilised.
24	Do you have views on the effectiveness of the	Arun's Local Plan does not allocate small sites and is therefore reliant upon much larger, strategic allocations in order to meet the housing target. However, as the authorities current 5-year housing land

	existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?	supply (HLS) is not being met (due to sites not being delivered – even with consent), the authority has seen smaller sites permitted on appeal together with windfall developments. This undermines the delivery of strategic sites and supporting infrastructure as planned infrastructure capacity to support strategic schemes is used up requiring redesign and costs affecting viability. Whilst smaller sites can ensure that housing is delivered by developers, there are also positive elements of larger sites which will deliver substantially more infrastructure, most of it 'on site'. infrastructure is also phased as part of the delivery of larger developments. The identification and allocation of smaller sites may be problematic to a Local Plan because of complexities of small-scale sites and distribution. HELAA intelligence is frustrated because of the uncertainty over the plan making and decision-making weight being given to sites included that has recently crept in with Inspectors decisions. This may frustrate the identification of sites and potential supply as well as lead to unintended development and appeals which then undermines planned development that has been align to infrastructure Finally, it should be remembered that at present small sites are referred to as being up to 1ha. Such a site could accommodate a good number of units in certain urban or town/city centre locations and would not necessarily be classed as 'small'.
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?	There are a few options which could be considered: • Require a higher percentage of smaller sites to be allocated in a plan or • Require HELAA and BLR to focus on actively identifying smaller sites – this would help a LPA to ensure that sites are available and therefore suitable for allocation • Link the number of small sites identified in the BLR or HELAA and the housing target…. i.e. if an LPA has a high housing target and a good number of sites in the BLR/HELAA then they should be required to allocate more smaller sites. • Require smaller urban sites – 1ha is quite large and could in certain circumstances accommodate a good number of units • Clarify the high level plan making status of sites in HELAA studies as opposed to decision making and appeals which is unhelpful.

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, the definition should be amended to make it easier for organisations to deliver affordable rent housing. Government website details ‘Of those who begin the application process most – around 80% – do not become a registered provider.’ If the description was amended to make it easier for non-registered providers such as community led development, to benefit from affordable housing then it is likely to lead to an increase in the number of providers that can deliver affordable properties thus contributing to their overall delivery
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?	Perhaps including reference that these must be brought forward via a NDP or Community Land Trust (CLT)?
28	Is there anything else that you think would help community groups in delivering affordable housing on exception sites?	By referencing community led development specifically within local policy, it will help assist with the delivery of these developments.
29	Is there anything else national planning policy could do to support community-led developments?	By referencing it in policy and including a definition within the glossary this will ensure that its inclusion has more emphasis.

30	Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?	The implementation of this and ongoing monitoring of developer performance/behaviour would place additional burden on already stretched LPA resources. Practically it is very unlikely to be able to be properly implemented.
31	Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?	Unless there is a requirement for developers to provide details of their delivery performance as part of the application it is unlikely that either option 1 or option 2 will be workable or implementable given LPA resources. However, if these measures can be implemented in a manner which does not place unnecessary burden on LPAs to monitor performance then option 1 would be preferable.
32	Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?	It should first be highlighted that an increase in planning fees to enable the prompt determination and discharge of conditions whilst welcomed, fails to take into account the challenges faced by LPAs with recruitment. However, the proposals in an ideal scenario are sensible and would likely place additional pressure on developers to build out quicker or at the very least be realistic with their delivery trajectories.
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?	We agree with making changes to emphasise the role that good design makes as this is vital to placemaking. The definition of 'beauty/beautiful' is subjective. Therefore, it may be preferable to refer to some informed and community based standard - achieving a high standard of urban and community based design.

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?	Beautiful is defined as 'pleasing the senses or mind aesthetically' which does provide further clarification as to what is expected of 'well-designed places'.
35	Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?	Yes and should cross refer to para 56
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? If no, how	No as not all LPAs are predominantly urban in nature where such an approach would be appropriate. It would be more helpful across the board if the point about greater densities to maximise housing provision was a standalone para in Chapter 11.

	else might we achieve this objective?	
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?	The general point that is being referred to is well recognised and accepted that this would be an immediate solution that could be put in place to help reduce some associated issues of climate change, especially flooding. At present there appears to be little change within the document (revised NPPF) that would address this point, so we would encourage that it is considered for inclusion in national development management policies and consider that there should also be sufficient flexibility to allow for local circumstances to be accounted for.
38	Do you agree that this is the right approach making sure that the food production value of high value farmland is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?	The wrong footnote referenced in (summary document), which mentions footnote 58. This is actually footnote 67 which appears to have had an addition made to it. The new addition however only refers to food production and not, as within the summary document the various other associated, or separate values for say flood alleviation. It is understood this is focused on increasing the protection for a specific purpose and this is appreciated in Arun due to the District being an area where this is particularly relevant. The overall issue with respect soils remains that even though work is done by various bodies, national level information recognised by Inspectors and national policy, has not been updated for over a decade. The last Soil Study was published in 2009 and referred to improvements being delivered by 2030. The Agricultural Land Classification, which is recognised as representing BMV, still dates from 1988 and there has been significant alteration of land area and soil value since including risks and changes arising from climate change. Either by directing or allowing BMV to be measured on the basis of more localised information, this may help without any updating of the ALC or importantly, associated mapping to reflect the changes over the past 35 years. Direction suggesting what other sources or documents would be accepted for these purposes, may help to address this e.g. in a national policy, before any updating occurs may begin to address this.
39	What method or measure could provide a	Fabric first being integrated in national DM policy, plus raising the basic standards in the Building Regulations (particularly Parts G and L). These would then reflect both those targets in the majority of

	proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?	company Water Resource Management Plans (WRMP) and the needed move towards reducing consumption and impacts to the environment to deliver net zero by, if not before, the challenging target set.
40	Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?	Yes. Flood alleviation, nature-based projects and Green Infrastructure may go hand in hand with the need to store water in the face of drought or indeed flooding, taking a longer-term perspective of climate change oscillations. National policy could include references to Local Plans and communities exploring long term and innovative solutions including scope for pumped water storage etc and other energy sources such as hydro and wave as well as wind. There needs to be an acceptance that when sensitively designed, potential larger sale projects such as these, may be acceptable in protected areas e.g. National Parks which may have the topography and land resource to create enhanced and new features that complement reasons for designation.
41	Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?	No comment
42	Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?	No comment

43	Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?	No comment
44	Do you agree with our proposed 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 The proposed new paragraph only seems to focus on larger non-domestic buildings and importantly seems to miss that simple alterations can be made to non-heritage assets to improve energy efficiency, although these should not be to the detriment of the character of an area. It must be remembered that it is far too easy to negatively alter the exterior of a building when making adaptations, and therefore negatively impact an area's overall character. Heritage assets both designated and non-designated outside conservation areas should not be forgotten and special attention should be paid to any reasons for designation to prevent damage to these features. It is recommended that further joint work should be undertaken between the department (DLUHC) and Historic England so that a clear agreed approach is made with regards to energy efficiency improvements and the historic environment – this information could then become part of the NPPF and/or PPG in the form of suggested DM policies or standards, as opposed to Historic England advice notes, which importantly do not currently form part of government policy, and therefore have reduced weight. This will provide greater certainty as to the type of improvements that will be considered acceptable and reduce the need for LPAs to produce their own guidance interpreting various documents from Historic England.
45	Do you agree with the proposed timeline for finalising local plans, minerals and waste plans	Yes, the timeline seems reasonable given the long lead time in working up signalled changes. Progress should not be delayed further order for authorities to make informed decisions about resourcing plan making.

	and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?	
46	Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?	Yes, as above.
47	Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?	Yes, we agree with the proposed timeline, this will of course require the sufficient resources to allow these timescales to be delivered.
48	Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?	No. Whilst the need for an end date to be given to SPD's and their use as part of the local plan is understood, the deadline proposed would be restrictive, especially for those authorities with limited resources. What would happen to the information and approaches contained within the documents if the authorities do not have resources to 'convert' them into Supplementary Plans, and they expire? In section 13 an example is provided – this is relevant to this LPA, as it relates to authorities whose plan is more than 5 years old when the new system comes into force (late 2024). The text helpfully states that the planning authority would be required to begin new-style plan-making straight away. It also states that their SPD's will also expire on the date at which they are required to adopt a new-style plan i.e. 30

		months after they commence plan preparation. This would mean that if the LPA wishes to maintain the former SPD's, it will also need to prepare supplementary plans at the same time as preparing a new local plan. At the present time, the LPA has a suite of SPD which are used in the determination of planning applications related to Open Space provision and car parking standards etc. This requirement, or deadline, would have serious resource implications on the LPA. It is not clear how most LPA's, including this one will have enough resources to prepare both the new Local Plan and any relevant Supplementary Plans at the same time. It is suggested that the end date for the SPD should be 30 months after the adoption of the new Local Plan, not at the same time.
49	Do you agree with the suggested scope and principles for guiding National Development Management Policies?	Yes
50	What other principles, if any, do you believe should inform the scope of National Development Management Policies?	None
51	Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?	Yes
52	Are there other issues which apply across all or	In the enforcement section, spell out clearly that enf investigations should at all times follow the steps set out in LPA published enf strategies. One of the examples in the table at 15 is allotments. It would

	most of England that you think should be considered as possible options for National Development Management Policies?	not seem to meet the final part of 12.3 Selective new additions to close 'gaps' where existing national policy is silent on planning considerations *that regularly affect* decision-making across the country (or significant parts of it). It is not felt that the subject regularly effects decision-making. A change to the NPPF wording would appear better than a NDMP.
53	What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?	The NPPF and the planning system have the potential to deliver the built forms of development required to achieve some of the missions of the Levelling up Bill – which are positive and optimistic. It is considered that the framework largely covers the levelling up missions, especially in terms of job creation through the provision of new employment land and facilities, a requirement for more homes etc. The policies in general could be more detailed to specifically note which levelling up mission it seeks to deliver.
54	How do you think that 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?	Every part of the country is different and has its own special characteristics and features; there is no one size fits all approach that will work. The approach for each area should be tailored so that it is specific to it. By allowing LPAs to tailor the approach to attract, maintain and grow investments in their specific area, there is a greater chance of success. This would have to be evidence based and specific to that particular area; it has to be remembered that not every district or borough will be able to attract technology companies, life sciences and all those involved in Research and Development. However, they should be able to encourage a more diverse mix of uses and provide more employment land/space that is technically required based on the amount of residential development proposed (if there is a clear justification). The framework could also better support economic growth by ensuring that development takes place in the right locations. For example, by increasing urban density it will encourage growth within areas such as local high streets which in turn can result in an increased demand for shops/businesses/services etc. There should also a stronger requirement for Local Plans to tie up with economic strategies and wider regeneration plans for a district or urban area. This could be a requirement of the revised NPPF.

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?	National policy could provide more emphasis/targets to deliver the sites recorded in the brownfield land registers. This would help bring forward development in the places that it is needed to facilitate gentle densification in the urban cores.
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 in society feel safe in our public spaces, including for example policies on lighting/street lighting?	'Secured By Design' addresses some of these issues already but it is imperative that it is included in the framework so that it becomes part of planning policy.
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?	It would be useful if the digital document is interactive instead of just having to use the search function. It might also be useful in some cases to have some illustrations to explain some of the principles being required.

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.	We don't envisage significant impacts that may arise under the Public Sector Equality Duty because of the proposed amendments. However, improvements could be made to include policies which promote housing for all groups of people and a requirement to provide or allocate such housing. Clarity is also required on provision of Gypsy and Travelling accommodation and sites requirements and also housing for other groups with protected characteristics. There is a push for Planning to be more accessible and certainly some policy on consultation methods to be more inclusive including policy on digital discrimination.