

CCN

COUNTY COUNCILS NETWORK

Consultation Response

*Levelling-up and Regeneration Bill:
consultation on implementation of plan-
making reforms*

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About the County Councils Network

The County Councils Network (CCN) represents 37 English local authorities that serve counties. The 20 county and 17 county unitary authorities that make up CCN are the largest part of the local government family. They represent all four corners of England, from Cumbria to Cornwall, Durham to Kent, North Yorkshire to Suffolk, Derbyshire to Essex.

Our members bear differing planning responsibilities under existing planning regulations. Crucially, county councils lead on the provision of infrastructure, transport, flood risk, local nature recovery and climate change, and on economic development that supports housing and other developments in district local plans. CCN's county unitary members are single tier authorities responsible for upper lower and upper tier services including development planning and infrastructure delivery.

The essential services our members provide touch on the everyday lives of residents and businesses across 86% of England's landmass and 47% of its population. The areas represented by our members constitute 38% of local government expenditure; 44% of total public expenditure (£201bn); and generate just under half of all tax revenues (£255bn). The economies of our areas contribute 38% of Gross Value Added (GVA) and 44% of employment.

Summary

CCN welcomes the opportunity to respond to this consultation. Our members fully support a plan-led planning system with up-to-date plans that are regularly reviewed to ensure the aspirations of an area are being met. However, our members have concerns over some of the proposed timescales for getting new local plans in place, along with the resources and capacity of their planning teams to make this a reality.

Our key points in relation to this consultation are:

- We welcome the new emphasis on vision-led plans, believing that this should make local plans, and thus the planning system, more approachable and engaging for local communities.
- We are concerned about the proposed minimum parameters for the content of a local plan to set out the "amount, type and location of, and timetable for, development", with the details of any infrastructure requirements, or requirements for affordable housing seemingly optional. Infrastructure and affordable housing requirements should be an integral part of a plan.
- We welcome the introduction of gateway checks and believe these could help the process of plan-preparation and make examinations smoother resulting in the adoption of more local plans.
- We are concerned about the proposed timescales for some authorities to get new plans in place. Particularly, our unitary authority members feel that the new timescale of 30 months is not viable, given the size of the area that their plans will need to cover and the challenges and complexities that their plans will need to address. We urge the department to work with larger councils to understand the challenges they face around the development of local plans and put realistic timescales in place for new plans to be prepared.
- We remain concerned about the lack of mechanisms to encourage more joint working between district and county councils in two-tier areas, allowing areas to discuss and

overcome strategic issues and plan across boundaries. More details of a proposed mechanism should be set out in future consultations, and this should also be subject to the gateway checks and ongoing plan monitoring.

- The proposals in this consultation, whilst often having merit, will place yet more burden on local planning authorities who are already struggling with capacity and resources. Whilst we recognise that the department is undertaking work to overcome some of these issues, planners and authorities need more support as quickly as possible. This includes increased core funding and planning fees, ringfencing funding to planning departments, and working with the sector to attract and retain talent within councils.

We encourage the department to read this consultation response in conjunction with the individual responses from our member councils. Our response to the consultation questions can be found below.

Response to consultation questions

Question 1: Do you agree with the core principles for plan content? Do you think there are other principles that could be included?

Overall, CCN welcomes the approach and core principles outlined that should shape the content of local plans and minerals and waste plans, including that plans should be vision-led. Planning and planning policy is often complex, and simplifying local plans to enable more people to understand them can only be a good thing. However, there will also need to be a level of detail to ensure that plans are comprehensive and are not overly simplistic at the risk of watering down their direction.

We are concerned about the minimum parameters for the content of a local plan to set out the “amount, type and location of, and timetable for, development”, with the details of any infrastructure requirements, or requirements for affordable housing seemingly optional. We would urge the department to reconsider this, as development without the necessary infrastructure to mitigate the impacts of development or without affordable housing required to meet local demand cannot be sustainable. Given sustainability will continue to be a golden thread that runs through local plans, which CCN wholeheartedly supports, this change should be essential.

We support the proposals for a key diagram that represents the spatial strategy for an area. This does raise wider questions around planning across boundaries and where major development may have an impact on more than one local authority area, but we will cover this later in the consultation.

Question 2: Do you agree that plans should contain a vision, and with our proposed principles preparing the vision? Do you think there are other principles that could be included?

CCN agrees that a vision-led approach should form the basis of a local plan that runs through the entire local plan, particularly visions that are a golden thread, and which set measurable outcomes for the plan period. This is something that is likely to be able to be agreed with the local community and councillors giving a good basis to start preparing a local plan.

We particularly support the proposal to ‘encourage planning authorities to make links more explicitly between the vision and other relevant corporate or thematic strategies produced

by other authorities, public bodies and partnerships, to help secure more buy-in for local plans as vehicles of change'. However, there needs to be more than encouragement to ensure this happens, and we believe that the proposed alignment test may provide an opportunity to ensure this happens.

There are numerous organisations and bodies that will play an important role in the vision setting and implementation of the vision through their own work. Bodies such as Sub-National Transport Bodies, Growth Boards, Chambers of Commerce and education institutions will all have a plan that should feed into the vision of a local plan. Ensuring that, through the alignment test, these plans are considered and taken into account will ensure the plans longevity and will help to ensure buy-in from all parties.

Question 3: Do you agree with the proposed framework for local development management policies?

CCN welcomes the ability for the local planning authorities to set their own development management policies where there is a justifiable reason to do so. This will help them to create local plans and policies that respond to local circumstances, and local places making it more likely that communities will support development. We agree with the proposed framework but believe that planning authorities should also be given the ability to override or alter certain policies from the National Development Management Policies where a bespoke approach would be more suitable.

Question 4: Would templates make it easier for local planning authorities to prepare local plans? Which parts of the local plan would benefit from consistency?

CCN agrees with the principle of introducing templates as a starting point for local plan production, as these would encourage consistency across the country potentially making local plans more accessible. We agree that this could set out things like a contents page, proposed layouts for different types of policy as set out in the consultation, as well as ideas for the proposed policy maps. In preparing any templates, we would urge the Government to consult with planning authorities as they are developed.

We would urge that the templates be a starting point, allowing authorities to deviate from them where necessary and justifiable to prepare a plan that best meets their vision. Again, this is something that could be agreed as part of the gateway checks, if there is one done early in the plan preparation process.

Question 5: Do you think templates for new style minerals and waste plans would need to differ from local plans? If so, how?

There may be different types of waste to consider that are specific to each authority, and different management routes that are required. However, as outlined above, if templates are flexible enough, they should be able to be used by minerals and waste authorities in the preparation of minerals and waste plans. We would once again urge the Government to work with minerals and waste authorities in preparing templates prior to their publication.

Question 6: Do you agree with the proposal to set out in policy that planning authorities should adopt their plan, at the latest, 30 months after the plan preparation process begins?

CCN agrees with the overall aim to reduce the amount of time it takes to get a local plan in place. Our members support a plan-led system, with up-to-date local plans being the most essential component. It is important to note that there may be many justified reasons as to why a planning authority has not been able to progress their plan as quickly as they may have liked to such as a change in political leadership. In addition, constant tinkering of the system causes uncertainty and leads to authorities being concerned that a plan is going to be out of date the moment they adopt it.

However, whilst we agree that an agreed timescale is helpful, we would question how the 30-month timescale has been agreed and would like to understand further the process that has been undertaken to arrive at this timescale. For many of CCN's member unitary authorities, who are the planning authority for their areas, they will be preparing a local plan that covers an area formally made up of a number of district councils and therefore at much larger spatial scale. For example, Wiltshire covers an area formally consisting of four district councils and North Yorkshire covers an area formally consisting of seven district councils. For these authorities, the 30-month timeline feels very tight given the plans will be covering a much larger area. We would urge the Government to engage with our unitary member authorities further before this policy is progressed.

In terms of the proposals outlined in this consultation, we do welcome the broad outline of phases that are proposed, particularly the scoping and early participation phase, which falls outside the 30-month timeframe, and the proposed gateway checks.

For all authorities, there are matters outside the scope of this consultation that will need consideration if the proposed deadlines are to be met. This includes planning for housing, particularly in those areas where housing need is high, and where there are constraints such as Green Belt that will prevent housing need from being met. As we outline above, there must be a robust mechanism that allows conversations to be had across boundaries so that unmet need can be delivered elsewhere in sustainable locations.

Question 7: Do you agree that a Project Initiation Document will help define the scope of the plan and be a useful tool throughout the plan making process?

We agree that a Project Initiation Document would be a good way to help define the scope of a plan, and as a tool to engage with a wide range of stakeholders, including the local community and statutory bodies. The Gateway Check proposed after this stage should help to establish whether there has been sufficient engagement and could be used to establish where further involvement from other bodies may be required during the plan-making process.

Question 8: What information produced during plan-making do you think would most benefit from data standardisation, and/or being openly published?

There is a wealth of data that would benefit from being standardised and/or openly published. However, CCN believes the most helpful would be data around housing need, housing starts and completion and information around infrastructure need and financing.

Question 9: Do you recognise and agree that these are some of the challenges faced as part of plan preparation which could benefit from digitalisation? Are there any others you would like to add and tell us about?

We would agree with the barriers outlined. CCN believes standardisation (to a degree) and digitisation of local plans could have enormous benefits over engagement with the planning system, leading more people to getting involved and shaping their places.

Question 10: Do you agree with the opportunities identified? Can you tell us about other examples of digital innovation or best practice that should also be considered?

We would agree with the opportunities identified, particularly around standardisation of data for consistency, access and use. This could help to promote increased collaboration across local authorities which could also translate to working on planning-matters across boundaries.

Question 11: What innovations or changes would you like to see prioritised to deliver efficiencies in how plans are prepared and used, both now and in the future?

As we have outlined over the last few years, CCN believes that planning at a larger-than-local scale would be the one of the best ways to improve efficiencies in plan-making, particularly in two-tier areas. A high-level strategic plan that sets out a direction of travel for growth across a wider area would provide a good basis for local plans to be prepared and would contribute to more efficient gateway checks and examinations. The new Joint Spatial Development Strategies that will be introduced once the Levelling Up and Regeneration Bill has received Royal Assent could go some way to help achieve this but believe that this presents a missed opportunity given that they will be voluntary.

Finally, many of our members have expressed frustration with delays with the Planning Inspectorate. Given the new gateway checks that are proposed, we have concerns that the Inspectorate will be under more pressure and will need additional resource to carry out the proposed functions.

Question 12: Do you agree with our proposals on the milestones to be reported on in the local plan timetable and minerals and waste timetable, and our proposals surrounding when timetables must be updated?

CCN is supportive of the removal of Local Development Schemes and replacing it with a simpler local plan production timetable. We also support the standardised approach, as well as the proposed milestones. We also support the proposals to require authorities to regularly update timetables at least every 6 months, along with the proposal to delegate powers to officers to update the timetable.

Question 13: Are there any key milestones that you think should automatically trigger a review of the local plan timetable and/or minerals and waste plan timetable?

Please refer to responses from individual member councils.

Question 14: Do you think this direction of travel for national policy and guidance set out in this chapter would provide more clarity on what evidence is expected? Are there other changes you would like to see?

We welcome the proposals to provide clear evidence expectations through national policy, as well as the proposed distinction between evidence that is required to ensure that a plan is legally compliant, versus other evidence that may be used to inform the plan during production.

It is important to consider local circumstances, and a planning authority may wish to explore additional evidence that helps them to understand a certain issue that is unique to that authority, or to understand an issue in more depth in order to have a robust plan. Future guidance should not prevent them from doing this. The gateway checks would be a good place to agree planned evidence with an inspector and review it as a plan progresses.

Question 15: Do you support the standardisation of evidence requirements for certain topics? What evidence topics do you think would be particularly important or beneficial to standardise and/or have more readily available baseline data?

For certain topics, CCN supports the standardisation of evidence requirements. Again, we would request that planning authorities are able to deviate from the standardised approach where it is justifiable to do so.

One area where members feel it would be beneficial to standardise evidence is around Waste Needs Assessments. These currently use vastly varying methodologies and assumptions, related to an underlying lack of data. Lack of experience and time within Councils lead to them being completed by consultants a lot of the time, with associated increased costs and vastly varying outcomes. Standardising the approaches and methodologies for estimating waste baseline data and forecasting waste data will be extremely beneficial, even if only for the principal waste streams and hazardous waste.

Question 16: Do you support the freezing of data or evidence at certain points of the process? If so which approach(es) do you favour?

CCN supports the freezing of data to expedite the plan-making process and reduce the burden and costs to local authorities. We do not have a particular view on an approach and would urge the department to engage with planning authorities to define the most suitable one.

Question 17: Do you support this proposal to require local planning authorities to submit only supporting documents that are related to the soundness of the plan?

CCN supports this approach.

Question 18: Do you agree that these should be the overarching purposes of gateway assessments? Are there other purposes we should consider alongside those set out above?

CCN fully supports the introduction and purpose of gateway checks and hope that these can be viewed as a beneficial tool for both the planning authority and the inspectorate rather than as a sanction towards the authority. The checks will hopefully ensure that the plan-making process is smooth and that any deficiencies are identified early on so that they can be addressed making examination smoother.

Question 19: Do you agree with these proposals around the frequency and timing of gateways and who is responsible?

We agree with the proposed frequencies and timings of gateway checks but would question the decision to make the second of the first two checks advisory. It would seem sensible for the second check to also have a binding role to delay or halt plan production if the person responsible is concerned that legal and regulatory issues that have been identified would not be addressed in time for the third pre-examination check. This could save valuable time in between the second and third check and would ensure that issues are being addressed. An alternative route would be to introduce an additional check between the second and third, if an inspector identifies significant issues that need to be addressed.

We understand that getting plans in place is important and can see the rationale behind requesting that authorities continue with plan preparation whilst the gateway checks are being undertaken, the capacity of planning authority teams means that may not always be possible.

In terms of who is responsible, we agree with the approach but would make a case for ensuring that the same person sees a plan through each of the gateway checks for consistency. It is unclear whether the proposals include this.

Question 20: Do you agree with our proposals for the gateway assessment process, and the scope of the key topics? Are there any other topics we should consider?

CCN broadly agrees with the proposals for the assessment process and the scope of the key topics. However, whilst we are supportive of the principle of the gateway checks, we are concerned about the lack of mechanisms to deal with any identified issues, particularly in relation to housing delivery. Without further details of how planning authorities would be expected to overcome significant issues, it seems like this could be a stopping point in some of the most extreme cases.

We are also concerned about the statement at paragraph 114 that sets out that interested parties should not be invited to participate in workshops or contribute to reports. We understand that this would cause delays if any interested party submitted representations, however, in two-tier areas we would request that county councils are either able to be involved in the gateway checks, or they are invited to submit feedback as the plan in progressing so that matters that concern them, and their functions, can be addressed.

We would urge the department to work with planning authorities as the working model is progressed.

Question 21: Do you agree with our proposal to charge planning authorities for gateway assessments?

No. CCN does not agree that planning authorities should be charged for gateway assessments. As a burden that is being placed on them centrally, these should be fully funded by the Government or Planning Inspectorate. It is vital that additional burdens placed on planning authorities are fully funded, and that planning authority services are placed on a sustainable financial footing.

Question 22: Do you agree with our proposals to speed up plan examinations? Are there additional changes that we should be considering to enable faster examinations?

We agree with the principle of speeding up planning examinations. Recognising that the gateway checks should iron out any issues as the plan is being prepared, the timescales set out should be achievable. The consultation recognises that plans can deal with particularly contentious or complex matters and can cover significant geographies, but again does not cover how these issues might be resolved. Once again, there is a large gap within policy about how these strategic, larger-than-local matters can be resolved.

We are also concerned that if interested parties and statutory bodies are unable to comment at the gateway checks, the examination could be held up by those bodies giving representations on matters that could be addressed within the gateway checks.

The consultation states that one of things that is being considered is using panels of two or more inspectors by default to allow for more parallel working. It would make sense to us for one of the inspectors appointed to be the inspector that has undertaken the gateway checks to ensure continuity.

Question 23: Do you agree that six months is an adequate time for the pause period, and with the government's expectations around how this would operate?

We would hope that the gateway checks would result in a smoother examination process, but understand the need to make provisions to pause an examination should there be cause to. We would generally agree that plans should be paused for no longer than six months, though inspectors should be able to extend this time period in extenuating circumstances if it meant the plan could be progressed rather than withdrawn.

Question 24: Do you agree with our proposal that planning authorities should set out their overall approach to engagement as part of their Project Initiation Document? What should this contain?

CCN welcomes the emphasis on community engagement, and the increased focus on digital technology as a means to increase engagement in plan-making. Our members look forward to hearing more about the digital toolkit in due course.

We agree with the approach to set out an overall approach to engagement as part of the Project Initiation Document.

Question 25: Do you support our proposal to require planning authorities to notify relevant persons and/or bodies and invite participation, prior to commencement of the 30-month process?

We support and agree with the proposal to notify relevant persons and/or bodies and invite participation. Again, this is an additional burden that planning authorities would need to undertake, and this should be considered in future funding.

We agree that the introduction of a vision within the plan could provide excellent opportunities as a starting point for consultation, as well as initial principles that the plan should follow. In terms of when and how long the early consultation should be, CCN does

not have a particular view and believes this should be the decision of the local authority, rather than a one-size-fits-all approach.

The consultation document states that, in identifying who should be invited to participate in the early stages of plan-making there should be a requirement for local authorities to invite neighbouring authorities, and 'any such authority that, in the view of the planning authority, may have an interest in the plan'. We welcome this, but would urge that in two-tier areas, it is made explicitly clear that county councils should be included as part of this activity.

Our county council members often encounter frustrations around the lack of upfront and continued involvement in the planning process and the proposals in this consultation, whilst not being the most ideal remedy for these issues, could provide a good start to increasing county council involvement which would bring a range of benefits to the plan-making and planning process. Not least would be guaranteed conversations about existing and proposed infrastructure projects, the infrastructure requirements to mirror proposed housing and development, and how these might be financed.

Question 26: Should early participation inform the Project Initiation Document? What sorts of approaches might help to facilitate positive early participation in plan-preparation?

We believe that authorities should be free to plan participation themselves through the Project Initiation Document, rather than seeking to consult on means of consultation. If the Project Initiation Document is part of the gateway check, the Inspector should be able to confirm with the authority whether the level and type of participation is satisfactory.

Question 27: Do you agree with our proposal to define more clearly what the role and purpose of the two mandatory consultation windows should be?

CCN agrees with this approach.

Question 28: Do you agree with our proposal to use templates to guide the form in which representations are submitted?

CCN is supportive of the use of templated for representations. These would help planning authorities to process and analyse responses.

Question 29: Do you have any comments on the proposed list of prescribed public bodies?

CCN supports a more formal role for public bodies in the plan making process, particularly early on in the plan-making process when principles and visions are being discussed. The document states that county councils should be engaged 'where relevant'. We assume that this would mean where a plan is being prepared by a planning authority in a two-tier area, the county council must be engaged. If this is the case, we would request that the regulations make this explicitly clear. If this is not the case, and the regulations would give the district council the autonomy to decide whether it is relevant to engage the county, we request that this is amended as per our previous point, so that the county is automatically notified like the other prescribed public bodies.

For the reasons we have already set out within this response, we believe the early involvement of the county council is vital to plans being successful, viable and deliverable.

Question 30: Do you agree with the proposed approach? If not, please comment on whether the alternative approach or another approach is preferable and why.

We agree with the proposed approach.

Question 31: Do you agree with the proposed requirements for monitoring?

CCN agrees with the principles of monitoring progress, activity, achievements and to record any issues that need resolving against the policies and vision with the local plan, and we agree with the requirements for light touch and detailed returns to support this. If a key aim of the system is to become vision-led, part of the monitoring should be against the vision of the plan.

Whilst we agree that a scale of monitoring will be helpful including the more light touch, some of our members have said that, in order to ensure they meet deadlines, they will begin preparing an updated plan as soon as they have adopted a new one. The more detailed four year return therefore may be too late, and it might be more helpful to undertake this at the three-year point to reliably inform the preparation for the first gateway checks.

Question 32: Do you agree with the proposed metrics? Do you think there are any other metrics which planning authorities should be required to report on?

We agree with the metrics outlined but believe that affordable housing completions could be broken down by tenure and size.

For waste, how the proposed metrics are defined doesn't allow any conclusions to be drawn on how waste being generated compares to the capacity to deal with this waste (waste generated defined by waste stream, but capacity defined by management type). Generally, once the total waste per waste stream is identified, it is possible to separate this into how much is required by management type e.g. recycled or recovered in line with policy aspirations and targets. This may be a better indicator of how plan policies regarding waste management are performing, i.e. waste generated by waste management type against waste capacity by waste management type.

We would add income versus expenditure of developer contributions, delivery of infrastructure against Regulation 123 lists (or equivalent). We would also like to see details of cross-boundary working and working between tiers of local government to achieve outcomes, particularly in two-tier areas. This could be used as a benchmark for future iterations of local plans. Finally, there could be a requirement for authorities to record how they are utilising the planning system to help achieve their net zero goals.

We again can't answer this question without turning to the point of resources. Whilst we outline that the outlined metrics certainly have merit, the amount of officer time that will be required to gather the information requested will be significant. We urge for authorities to be properly funded to allow them to have the capacity and resources to undertake these functions.

Question 33: Do you agree with the suggested factors which could be taken into consideration when assessing whether two or more sites are 'nearby' to each other? Are there any other factors that would indicate whether two or more sites are 'nearby' to each other?

CCN does not have a specific view. Please refer to responses from individual member councils.

Question 34: What preparation procedures would be helpful, or unhelpful, to prescribe for supplementary plans? e.g. Design: design review and engagement event; large sites: masterplan engagement, etc.

We believe that the types of preparation procedures that would be helpful will depend entirely on the subject and objective of the supplementary plan. In some instances, such as the example within the consultation about using a Supplementary Plan to shape an unexpected regeneration opportunity, it will be more important to allow the authority to quickly prepare the plan so that it can be adopted quickly and have the most chance of influencing any development.

Question 35: Do you agree that a single formal stage of consultation is considered sufficient for a supplementary plan? If not, in what circumstances would more formal consultation stages be required?

Generally, we would agree with this approach. However, there may be certain instances such as when they are used for design codes where more than one consultation may be helpful and well received by communities.

Question 36: Should government set thresholds to guide the decision that authorities make about the choice of supplementary plan examination routes? If so, what thresholds would be most helpful? For example, minimum size of development planned for, which could be quantitative both in terms of land use and spatial coverage; level of interaction of proposal with sensitive designations, such as environmental or heritage.

CCN does not have a specific view. Please see responses from individual member councils.

Question 37: Do you agree that the approach set out above provides a proportionate basis for the independent examination of supplementary plans? If not, what policy or regulatory measures would ensure this?

We agree with the approach to examinations for Supplementary Plans. Government should ensure that the examination process is proportionate to the subject, content and scope of the plan.

Question 38: Are there any unique challenges facing the preparation of minerals and waste plans which we should consider in developing the approach to implement the new plan-making system?

Our members have noted that the general approach to preparing minerals and waste plans has generally followed that for local plans, therefore, providing there is sufficient flexibility in the parameters of the new process (e.g. in the new templates/requirements) this will continue to be appropriate.

It is noted that the wording allowing 'one or more documents which are collectively to be known as the minerals and waste plan' seems to allow for the preparation of a 'core strategy' and 'site allocations' documents in addition to separate minerals and waste plans.

It is questioned whether this was the intention given the clear mandate for local planning authorities to now produce a single plan.

Question 39: Do you have any views on how we envisage the Community Land Auctions process would operate?

We understand the principles behind the introduction of Community Land Auctions, as well as the ambition to capture more of the value in land but have concerns about the auctions would work in practice, along with how they would interact with the planning system in terms of land being allocated based on its planning merits rather than where the best value can be achieved. We would request more details of this before these are taken forward.

We envisage that, legally, CLA's would be highly time consuming, and it is unclear how this would work on sites where options have previously been explored with landowners, or indeed where they already exist. This may be a barrier to sites being brought forward because of an existing expectation of value.

If the Government is to pilot these, then the pilots should also be in places where the Infrastructure Levy is also being piloted.

Question 40: To what extent should financial considerations be taken into account by local planning authorities in Community Land Auction pilots, when deciding to allocate sites in the local plan, and how should this be balanced against other factors?

As above, in the interests of the integrity of the planning system land should not be allocated based on anything other than its planning merits.

Question 41: Which of these options should be implemented, and why? Are there any alternative options that we should be considering?

CCN supports the adoption of a phased approach for new plans. We would think it would make sense for councils within a particular area, i.e. within a county area to be preparing their plans at the same time. This would ensure that they are as joined up and strategic as possible, although we remain concerned at the lack of strategic policy mechanisms that would require authorities to work together in the absence of the Duty to Cooperate.

We are supportive of the proposals to allow plans older than five years to be considered up-to-date as the new plans are being prepared. This is something that should apply to future plan-making rounds as many of our members have faced speculative development while between local plans, which undermines the new plan and increases hostility from residents towards new development and the planning system.

Question 42: Do you agree with our proposals for saving existing plans and planning documents? If not, why?

We agree with this approach. Where existing Supplementary Documents have been recently adopted, the planning authority should be allowed to easily update these and convert them into Supplementary Plans. In these instances, examination process should be proportionate and not overly burdensome.

Question 43: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

It will be important to ensure that no communities are excluded from engaging in the system due to the enhanced emphasis on digital tools. It is likely that a range of consultation methods will need to be utilised to ensure maximum reach to communities.