

South Oxfordshire's response to Government's 'Levelling-up and Regeneration Bill: implementation of plan-making reforms' consultation.

Submitted via online portal on 18 October 2023.

Associated consultation material can be found online [here](#).

CHAPTER 1: PLAN CONTENT

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

We agree with the core principles for plan content; however, we consider there to be two omissions to these principles.

Firstly, although the consultation explains that sustainable development will run as a golden thread throughout plans, and that a plan will contain locally distinctive policies which meet environmental objectives, there is no clear principle that relates to tackling climate change. South Oxfordshire has declared a climate emergency and we are therefore committed to tackling climate change and lowering greenhouse gas emissions through effective planning. The Council has also set a target to become a carbon neutral district by 2030. In order to meet this local target, and also for the country to meet the national target of meeting net zero by 2050, we need to ensure that tackling climate change is at the forefront of planning. The built environment accounts for an estimated 40% of the UK's total carbon footprint, and therefore it is crucial that addressing climate change is a core principle for plan content, and a golden thread throughout plans.

Secondly, improving health and wellbeing should also be recognised within the core principles. The built and natural environment are key determinants of our health and wellbeing, and therefore it is important to recognise the role that good planning plays in influencing both our physical and mental health. Therefore, we think that the second core principle set out in paragraph 22 should be amended to state 'foster **healthy and** beautiful places and recognise the importance of design...', in order to recognise the importance of creating healthy places through planning.

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?

Yes, we agree that plans should contain vision, and think that it is important that a plan sets out its aims and objectives for the plan period. Both of our adopted plans, as well as our emerging Joint Local Plan, have benefited from a plan vision. The proposed principles that authorities will need to have regard to when creating a vision also seem reasonable and reflects the approach we have recently taken in developing the vision for our Joint Local Plan. We also understand and accept the focus on visions having deliverable outcomes, but consider that they should still remain ambitious, and therefore some of these aims will be deliverable in the longer term.

We welcome the proposal of providing a template that would set out what the vision should do and contain, as this would help ensure that visions are consistent in their scope and detail across different local plans. It will also help everyone understand the role of the key diagram, and how it should set out the vision for the area spatially through an easily understood visual.

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

We agree that local development management policies should be justified and also relate to the plan vision. Further detail regarding what is meant by 'appropriate justification' is required, and how this should be demonstrated. We think that evidence should be minimised where possible, as if extensive evidence is required to support local development management policies this will take a significant amount of time and resource to produce, as this consultation recognises in paragraph 84. This would make the 30-month timeline even more difficult to achieve.

However, we wish to reiterate what we stated in our response to the previous consultation (Levelling-up and Regeneration Bill: reforms to national planning policy consultation, December 2022), that the proposed National Development Management Policies should not restrict local authorities in their policy aims by still allowing them to set ambitious policies that test the boundaries on key local, as well as national issues such as net zero. We welcome further consultation on these National Management Policies once they have been decided, so we can provide an informed comment that reflects the true scope and principles as they will be set out.

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

We think that all sections of a local plan could benefit from a flexible template to ensure consistency and introduce some level of standardisation to the way in which local plans are structured and set out. One part of the plan that would particularly benefit from consistency would be the plan policies, specifically the length, detail, language and structure of policies, as this is one of the main areas of variation between plans.

We do consider that the templates should still provide flexibility for plan makers, and therefore welcome the proposal for flexibility to allow for changes that reflect local circumstances and to enable innovation. At this stage it is unclear how prescriptive these templates will be and how the templates will be presented digitally. We think it would be beneficial for local authorities to be able to influence and help shape these templates, so we encourage consultation with local authorities on their development at the earliest opportunity.

It is also important that these templates are appropriately accessible, for example, ensuring they work with screen readers.

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

The preparation of minerals and waste plans in Oxfordshire is undertaken by Oxfordshire County Council, not the districts. However, as the purpose of minerals and waste plans differs from local plans, we think it would be beneficial to have separate templates tailored towards minerals and waste plans that reflect the structure and detail necessary for those plans, which may vary from that needed for local plans.

CHAPTER 2: THE NEW 30-MONTH PLAN TIMEFRAME

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?

The 30-month plan timeframe will be very challenging to meet, given that local authorities will also be moving to a new reformed system. However, it is useful to see the key plan making stages set out with their expected timescales to help understand how each stage of plan-making should be split over the 30-months, but again, we consider these to be quite ambitious and have little if any room for flexibility or provision for unexpected delays.

The timeline for our Joint Local Plan set out in our LDS is expected to take much longer than 30 months, in part due to delays outside of our control. The 30-month timeframe does not account for what are often unavoidable plan delays, for example, changes to national policy, pre-election periods, staff resourcing issues, and necessary sign-off processes. We are also unsure that it gives a sufficient amount of time for reviewing and considering consultation responses, which for a joint plan like ours that covers two local planning authorities, can be extensive. 30 months of preparation to submission of the Plan may instead be a more achievable timeframe. We also would like assurances that the Planning Inspectorate has the capacity and capability to address the requirement of these proposals.

There is also no mention in the consultation of what happens if a local authority is not able to meet the deadlines. Would there be penalties for the local authority? What if they were doing all they could to meet the deadlines but circumstances outside of their control are causing the delays? We think this is an important detail that has been left out of the consultation, and without an answer to these questions it is difficult to provide an informed position about the principle of what appears to be a very rigid timeframe.

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?

In principle, we consider that a Project Initiation Document will be useful to both help define the scope of the plan and also as a tool throughout the plan making process. It is similar to the current project plan document we use to guide the plan-making process, and we assume will act as a summary document of the findings of the planning authorities scoping, as it is stated it will set out the context, trends and possibilities of the planning authority's area. This will be useful in the first of the gateway assessments, to determine if the plan is setting off in the right direction.

However, it is hard to fully provide a view on how useful the Project Initiation Document will be without seeing an example of such a document. We encourage DLUHC to provide the template to planning authorities so that they can understand more fully what the document would consist of, as well as the extent of information that will be necessary to provide within it.

CHAPTER 3: DIGITAL PLANS

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

The local plan spatial data would benefit most from being openly published, so that layers can be shared as shapefiles easily. Currently due to OS copyright we can only share local plan spatial data with select external groups, for example those who are contracted to carry out local plan related work for us. This would save time for our planning policy team and the councils' data team, as it would remove the manual process of having to package up data that should be readily available. The data would then also be easily imported into any mapping product directly from online and the data could be updated as and when it is necessary.

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?

- *lack of clear guidance on how to make plans results in inconsistency and delays*

We agree that the lack of clear guidance can be a cause of inconsistency and delays. Although there are inconsistencies in plan making across different authorities this is often a reflection of the local level considerations and factors which go into developing a plan that is unique to that authority. Delays are often related to external factors outside the control of plan-making, for example Government changes to policy or political changes.

- *lack of standard formats and terminology makes plans inconsistent, time consuming to develop and hard to use*

We agree that a lack of standard formats and terminology can be a reason why plans are inconsistent, time consuming to develop and hard to use. However, plans should be able to be flexible in format in order to meet the needs of the authority in terms of aspirations, branding, creativity and policy objectives. This is not necessarily a one size fits all scenario. A variety of formats to use as a starting point could make plans easier to use as there will be familiarity in terms of how to navigate them for users. Standard terminology seems less of an issue as much of the terminology used should come from the NPPF or PPG.

- *uncertainty about evidence requirements and fear of challenge at examination drives over production of evidence which is resource intensive and leads to delays*

We agree with this challenge and this being a reason why delays occur. The certainty of having set standards for evidence requirements would streamline processes and conserve resources including officer time. Clear requirements would allow officers to work through this in a more efficient and focussed manner and would minimise the process of agreeing the scope and specification of the evidence base documents.

- *lack of clear communicable timelines and updates prevents users from understanding and getting involved*

We disagree with this challenge. For us our timeline of when users can get involved is published in our LDS and on our websites. We also give regular updates via press releases and social media in the run up to launching formal consultations.

- *plans are static and PDF-based meaning they go out of date quickly*

We agree with this challenge, however plans are required to be static currently. The plan cannot be amended once it has been adopted therefore there is a lack of flexibility. This would be challenging if plans weren't static as we would have no way to record the information that the public has used at any given time. For example, if mapping data were to be updated but someone had already extracted data then they may be looking at outdated information. Plans need more flexibility so they can be

updated/reviewed without the same level of evidence requirement that a full Plan requires, even if it is just in relation to links to guidance or data that has been updated as this will allow plans to remain relevant and up to date. It will be important to manage version control and user experience.

- *poor monitoring and feedback loops make it difficult to understand if the plan and its policies are working well*

It is challenging to monitor the detailed impact of policies unless the indicators are related to existing data that is collected through an existing process. It would be very resource intensive to have officers going out on site/across the authority regularly to review planning application implementation on every permission. If there was a way to automate or standardise some of these indicators, for example using AI to pull through from planning applications in the system, with some onus placed on the applicant to provide subsequent information, then this would reduce the resource burden and provide more meaningful monitoring of policies. Consideration should also be given as to whether some of the data would require additional input from other teams such as development management, as they also don't have the resource to manually input additional data for monitoring purposes.

- *the majority of people do not engage in plans, or know why and how they can be involved*

We agree that this is a challenge. To reach more people local authorities need to be more creative with their engagement strategies. It requires a combination of events, online consultations, and targeted engagement, for example with young people through reaching out to schools. Due to the nature of local plans, it is challenging to make the content engaging and accessible to all, particularly as they develop further through the steps in the regulations. For example, the initial engagement stages can be high level and issues related, however once it gets to preferred options and draft plan stage, the regulations mean that the content is much more text heavy and technical. This makes involving a wider audience much more challenging as it requires authorities to produce multiple versions of the content, for example summaries or easy read versions, to meet the needs of different audiences.

- *plans often involve making difficult local decisions but the political nature of local decision making and how it shapes plan content is often not understood*

It is not entirely clear what digital methods will be used to tackle this issue of improving the understanding of the political nature of plan making. It would be useful to understand the digital solutions that are proposed to address this challenge, and others presented above.

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 agree with the opportunities identified in the consultation. Sharing of best practice could also involve linking up with other authorities to discuss challenges faced. We have met with other councils to have these open discussions on things we wouldn't necessarily do in the same way again, as well as sharing things that went well. Both are valuable learning points to share as they can allow other authorities to avoid following a method that doesn't work so well and focus on processes that have been tried and tested and found to be more effective. However, the sharing of best practice requires time and resource, which could both be put under stress as a result of these proposals.

Another opportunity should be to encourage authorities to approach their existing providers to see how they can maximise their existing subscriptions. For example, approaching the authority's existing GIS supplier for advice on what the product can do beyond what it is being used for currently. This will allow councils to get the most out of existing investments and also avoids long procurement processes if it is an option to use existing subscriptions.

Additionally, an opportunity could be to offer training to officers on how to use digital systems. It may be that existing systems are in place that officers haven't had training to use.

These points require time and resource, and should be factored into the consideration of these wider proposals.

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?

There are plenty of excellent digital platforms to deliver or support plan preparation, however there are a number of challenges we have to consider currently when we are looking to use these systems. Innovations or changes that would address the challenges below should be prioritised. These challenges include:

- Procurement
- Requirement to make documents available in paper and PDF format
- Legacy
- Resistance to change from users

Procurement of digital platforms is time-consuming, even when using those from G-cloud 13 which is supposed to speed up the procurement process. Any delays to procurement of a system, for example a consultation platform, results in officers spending time looking into alternative options in case they cannot get the system in time for formal deadlines.

Most local authorities still provide both paper copies and PDF versions of development plan documents, as regulations are not clear regarding what is

required. This relates to the need to submit documents for examination but also to meet the requirements to provide paper copies at deposit locations. If plans are to be made more digital there needs to be a commitment to move away from the paper intensive processes and a real shift to digital first. Regulation 35 requires that:

35.— (1) A document is to be taken to be made available by a local planning authority when—

- (a) made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and
- (b) published on the local planning authority's website,

We think Regulation 35 is unclear as to whether paper copies of local plans (and other development plan documents) are required at deposit locations. It would be helpful for the regulations to be specific that 'available for inspection' would allow use of an internet terminal to act in place of the paper version. We understand and acknowledge that it is important to provide content in multiple formats so that everyone can access it. However, it would be useful to shift to a situation where documents are made available online as a first option and maybe a paper copy available at the main offices and on request elsewhere.

There are also legacy issues in some cases, for example if an authority uses a digital platform to present the plan or consultation documents they will need to continue financing and maintaining this platform in order to continue allowing access to the content until the plan is replaced.

This again shifts the focus back to producing PDF versions as a backup so that we have a copy we can access which is future proofed. Producing multiple versions of content is extremely time consuming. There are additional considerations, for example we need to ensure everyone who accesses the plan can view the same content. Therefore, if we include interactive maps in our online platform, we then have to reproduce these as static maps for the offline versions. This leads to inefficiencies as we are repeating the same content in multiple formats in order to address the requirements.

When it comes to formal consultations on the Local Plan, it is common for us to receive significant numbers of responses via email which makes processing responses much more difficult. This is particularly the case for developers or agents where they use a standard template which they use for all planning policy consultations as this streamlines their workload. We promote the use of our digital platform and have made this as easy to use as possible however we are still unable to prevent responses being submitted in this way. We also have instances of respondents using multiple methods to provide the same response, i.e., the digital platform and emails with attachments which can make review more lengthy, and lead to confusion/duplication. Innovation in platforms (and the regulations) which

could speed up or simplify the manual processing required when dealing with large volumes of emailed responses would deliver significant efficiencies for our team.

CHAPTER 4: THE LOCAL PLAN TIMETABLE

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?

We agree with the proposal to make timetables prepared by local authorities consistent, so that the local plan process and its associated milestones is easily understood by all. The milestones proposed to be reported on are reasonable, as long as it is very clearly stated what each stage involves, including the new gateway assessments, as the stages of the local plan are often complicated to those unfamiliar with plan-making.

We also welcome the proposal of a 'new, simpler requirement to prepare and maintain a local plan timetable', rather than the existing requirement to adopt a Local Development Scheme (LDS) which can be a complex to update and not easily understood. Although we have delegated authority to do so, for those Councils that do not, removing the requirement for full Council sign-off each time the timetable is updated will help speed up the process of making amendments to the timetable, particularly those which are minor.

The proposal to require planning authorities to revise their timetable at least once every six months is acceptable, however there may be times where no revisions are necessary so instead it should be required that the timetable is reviewed every six months rather than revised.

We agree that the timetable should be presented in a digital format, and a digital template will be useful to ensure the timetable is presented in a clear and consistent format.

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?

The key milestones that should automatically trigger a review of the local plan timetable are as follows:

- The conclusion of the scoping stage
- The conclusion of each Gateway assessment
- The conclusion of each consultation stage (including main modifications), where it can be more easily anticipated when the next consultation will take place or the submission of the plan if no more consultation is required.

- The conclusion of the plan examination hearings (so it can be understood when the main modifications stage will be).

CHAPTER 5: EVIDENCE AND THE TESTS OF SOUNDNESS

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?

As set out in our response to the previous consultation (Levelling-up and Regeneration Bill: reforms to national planning policy consultation, December 2022), we agree with the removal of the ‘justified’ test, and the proposal to move to a ‘proportionate’ approach to local plan evidence. We welcome the clarity provided regarding the meaning of ‘proportionate’ evidence, as this lacked explanation in the last consultation.

The current system fuels an ever more complex, expensive and inaccessible evidence base. By providing more clarity within national policy, as set out in the direction of travel set out in Chapter Five, this may help to reduce the complexity of evidence that needs to provide at examination, which can be a burden for local authorities both in terms of cost and time taken to collate necessary evidence. This will be particularly beneficial if plans are required to be prepared in 30 months.

We also support the proposed addition to national policy to clarify that evidence should only be discussed and argued against at examination where there is a significant and demonstrable reason for doing so, in relation to the tests of soundness and legal requirements. This will help local plan examinations remain more focused on key issues and assure local authorities that producing evidence for the sole purpose of risk management at examination is not required.

We think that additional guidance on ‘what good evidence looks like’ will be very useful for local authorities. However, the extent of a piece of evidence, including how it is set out and the data presented in it, can vary according to the topic and role of the evidence. Therefore, this guidance will need to be flexible enough to be applicable to all types of evidence. It would also be useful for this guidance to advise and/or require that evidence should be discussed with neighbouring authorities where it contains information that is relevant to and/or impacts them, prior the publication of the evidence. This would help to prevent and resolve disagreements on cross boundary issues relating to evidence, and the consequential delays to the progress of the plan as a result of these disagreements.

Additionally, it would be helpful if the guidance gave an indication of when evidence should and must be published throughout the plan making process, whilst allowing for flexibility.

We also welcome the review of the 'effective' test of soundness, particularly in terms of what evidence is needed in terms of demonstrating deliverability.

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?

Yes, we recognise that standardising complex elements of the evidence base could be beneficial for both local authorities and also stakeholders who are reviewing evidence. It will also help to reduce discussion at examination regarding the approach and methodologies used in evidence. Housing and Economic Land Availability assessments would benefit from further guidance and a clear, proportionate methodology. Strategic Flood Risk Assessments, open space requirements, the approach to establishing the need for specialist housing accommodation needs, and the approach to establishing employment land needs, could also all benefit from standardisation.

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

The freezing of data and/or evidence at certain points in the plan-making process seems acceptable, and the approaches set out all appear reasonable. The last approach regarding freezing evidence at the point of publication of the plan and submission to the inspectorate is not too dissimilar to the current approach, as most evidence is prepared for the examination stage and any further evidence is only normally produced at the request of the appointed examining inspector. However, this may not be possible for evidence that relates to strategic matters that cross authority boundaries (due to varying timelines of plans), so there would have to be exceptions put in place for this scenario.

The freezing of input data also appears acceptable, as long as local authorities are given the opportunity to update it if they consider it necessary. The consultation states the planning authority can do so if they feel there is an 'overwhelming reason for doing so', however clarity should be provided as to what would be regarded as an 'overwhelming' reason.

We also support in principle agreeing the scope of evidence or the methodology earlier in the process. However, flexibility should be given if this methodology requires amendment, or if it becomes very clear further evidence (or less evidence) is required. We request further clarity, perhaps in the form of examples, about the 'limited prescribed circumstances' that would be appropriate, where the scope of evidence and/or methodology can be amended.

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?

Yes, we support the proposal to only submit supporting documents relating to the soundness of the plan. This will help to reduce the amount of evidence required to support the local plan. However, we agree that this should not prevent planning authorities to publish wider materials to help explain decisions taken, as this is often necessary for wider understanding on policy decisions and to provide context on local issues.

CHAPTER 6: GATEWAY ASSESSMENTS DURING PLAN-MAKING

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?

Yes, we agree that the three purposes of the gateway assessments set out in the consultation are reasonable, i.e.:

- ensuring the plan sets off in the right direction
- ensuring compliance with legal and procedural requirements and (wherever possible) supporting early resolution of potential soundness issues
- to monitor and track progress.

Regarding the first purpose, this will ensure that the local authority has sufficient resources and the right tools to deliver the plan, and any key risks are raised and discussed prior to plan-making moving forward. However, the consultation states that 'suitable mitigation' will be proposed where risks are identified. It would be useful for the government to give examples of how they can help if this scenario arises, i.e., what would happen if at this stage it is identified that the local authority lacks the right tools and resources to take the plan forward? Would the government be able to provide further tools and assist with resource?

The second purpose is useful to ensure that by the time the plan is submitted for examination, that the local authority can be assured that the plan is likely to be found sound and meets necessary legal and procedural requirements. This will help to avoid key soundness issues being raised at the examination stage, and should assist with the smooth and timely progression of examinations.

The last purpose is also welcomed; however, this should be in the form of advice/a helping hand and overseeing the plans progress, rather than direct government involvement or intervention with the plan-making process, rushing the local authority. Over monitoring/tracking the local authority during plan-making is likely to have the opposite effect of hindering the progress of a plan rather than helping it move forward. Therefore, any monitoring and progress tracking that takes place should be well-managed and communicated.

Following on from this, we think an additional purpose of the assessments should be to provide advice to local authorities on plan-making. Often issues arise during the preparation of a local plan, and having a dedicated member of PINS to contact regarding issues arising would be very helpful for planning officers. This should be another key purpose of the gateway assessments as they present a useful opportunity to be a soundboard for local authorities to not only discuss soundness issues, but wider issues they have faced with plan-making and receive advice on how to resolve them.

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

We agree with the frequency of the gateway assessments, as three stages seems the correct number of assessments to be able to help and advise the local authority.

Regarding the timing of the gateways, it seems appropriate to gain advice and be subject to assessment when the scoping has been undertaken to ensure the local authority is heading in the right direction. It also seems appropriate to have another assessment/advice prior to Regulation 19 to highlight any risks and soundness issues, and lastly prior to submission of the plan to ensure it stands a good chance of being adopted.

However, it is stated that each assessment will take up to four weeks, or six in exceptional circumstances to take place. This translates to 3 months of the 30-month timeline, but up to over 4. Given that it is proposed to reduce the plan making process to 30 months, this is a very significant amount of time, which could have a significant impact on the plan's timeline. This should be taken into account, and when the local authority is undergoing a gateway assessment the 30-month timeline should be paused to allow for the assessment to be undertaken adequately, without putting pressure on timescales.

We understand that it is advised that plan preparation work should continue in parallel with these gateway assessments, however it will undeniably have an impact on plan making during the time it is undertaken, due to the resource, pressures and time it will take to prepare for and undergo the assessment. Therefore, in order for local authorities to realistically meet the challenging 30-month timeline, when an assessment is taking place this time should either be added to the 30 months, or the timeline should be paused. This should also include the preparation time prior to the assessment.

Regarding whom is responsible for these assessments, we understand that they will be undertaken by the planning inspectorate, with planning inspectors required for gateways 2 and 3, and if required, for gateway 1 as well. It would make sense for the planning inspector(s) that undertake these assessments to be the same planning inspector(s) who undertakes the examination. They would have knowledge of the

plan, the advice provided to planning authorities through the assessments, and any issues raised during the plan-making process (including any soundness issues), which would be invaluable knowledge to have during examination.

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?

The initial proposals set out appear to be acceptable in principle. However, we would like to raise again the resource and time it will take local authorities to prepare for and undertake these assessments. The proposals explain how the planning authority will need to prepare a number of documents for each assessment, as well as undertake a workshop day for assessments one and two. Completing these reports and undertaking a workshop will take a considerable amount of officer time, as well as necessary preparation work (including the need to engage with members) and tools that will be needed to meet these requirements.

With the inclusion of these assessments, emerging local plans are likely to take longer than 30 months to reach adoption. Many local plans made under the existing planning system already take longer than 30 months to produce, and this is without the inclusion of the proposed gateway assessments. These assessments will each take at least four weeks to complete, excluding all preparation work necessary to complete them, as well as any necessary internal sign offs required to proceed with a gateway assessment. Regarding sign off processes, it is unclear whether Councils would need to undertake a committee process to obtain councillor sign off to proceed with gateway submissions (through individual cabinet member decisions, cabinet or full Council). If so, these sign off processes could potentially add around 3 months of time to each gateway stage, which should be recognised.

It is clear to us that the resource and time required to undertake these assessments will negatively impact the 30-month timeline. Therefore, we again suggest that when a gateway assessment is undertaken, the 30-month timeline is paused to allow the assessment to be completed fully and reflect the disruption it will likely have on the plan-making process.

The key topics set out for each gateway process are reasonable. However, although we are happy to provide 'headline positions' required for Gateway 1 on how the plan will 'reflect any Local Nature Recovery Strategy' as well as how it will deliver 'new homes based on the standard method and recent Housing Delivery Test (HDT) results' and 'describe the high-level options available to deliver development needs in the area', we do not think it is the role of the assessor to guide the authority in these areas, rather to highlight key issues of soundness with the approach proposed. This is because, there should still be flexibility and freedom provided to local authorities to make their own decisions and arguments regarding the approach they are taking regarding these topics.

There needs to be clarity about why a headline position is required for only these two topics, and not on other key issues such as addressing climate change. Climate change should be a top priority for local plans to address, and therefore it would be beneficial for assessors to understand the local authorities position on addressing climate change at the first gateway assessment to ensure it is being sufficiently addressed.

We welcome the topic specific advice proposed for the Gateway 2 assessment and consider that this should be applicable to all gateway assessments where specific advice is sought.

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

No, we think that as this will be a mandatory assessment and a resource intensive task for local authorities, it would be unfair to require planning authorities to fully fund each assessment with a charge.

Local authorities are already facing significant financial pressures, and therefore charging them three additional fees for each assessment despite them needing to resource the preparation for the assessment, is unfair and it is yet another additional financial burden we would have to take on. The cost of developing a local plan is already a significant investment local authority makes, and therefore it is unreasonable to add further to this with new charges, particularly given advice from PINS is currently free of charge. If government would like local authorities to undertake these assessments and use their already limited resources and tools to successfully complete each gateway, they should fully assess and consider the financial impact this would have on local authorities. Alternative funding options to cover these new costs should be considered that would not add further charges to local authorities already facing more financing pressures, many of which are already struggling with resource issues and rising costs.

CHAPTER 7: PLAN EXAMINATION

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?

Yes, we agree with the proposals to speed up plan examinations.

The proposals state that an Inspector will be appointed when the planning authority commences the third gateway assessment. This would help to speed up the examination process, but it would make sense to have the same Inspector for the examination and the second and third (and first where required) gateway assessments, so they have a thorough understanding of the plan and an awareness of any local issues. We understand that it is proposed to have two or more

Inspectors for examination by default, and therefore one of these should be the Inspector that undertook the gateway assessments. Having two or more Inspectors for examination will also represent a cost increase for local authorities, as most examinations are currently only led by one. It will also mean that more Inspectors are required by the Planning Inspectorate – have assurances been sought that they can deploy sufficient Inspectors to meet the needs of the proposals?

We understand and accept that only inviting the planning authority to submit responses to the Matters, Issues and Questions (MIQs) would help to speed up the examination process, and avoid third parties from submitting extensive amounts of additional evidence which could have been submitted at earlier consultation stages. However, it should be noted that it can be useful for the planning authority to review MIQs representations from third parties to have an understanding of issues that may be raised at the hearing sessions of examinations.

We also agree with the proposal to streamline the main modifications stage, so that only the most significant amendments are focused on and consulted upon. The main modifications stage is often a time-consuming part of the examination, and uses a great amount of resource from the planning authority due to the extent of the changes they need to keep track of during examination, and the time it takes to compile these amendments into an accessible document. Therefore, by reducing the number of modifications that require to be consulted upon, as well as reducing the consultation period of the main modifications, we envisage the examination stage will be shorter.

We also think that virtual hearing sessions help to speed up local plan examinations. The South Oxfordshire Local Plan hearing sessions were virtual, and we considered this method to be a success, particularly in helping them take place quicker. It allowed more people to access them, given they could do so from their own home (meaning that there were no issues surrounding the location of the sessions), and thus reduced the carbon impact of travelling to the venue. Therefore, we would encourage having virtual hearing sessions as standard, unless there was good reason for them to take place in person.

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?

Yes, six months seems a reasonable pause period, but there should be flexibility. We also agree with how the pause period would operate, and that the examination should resume if the relevant matters have been dealt with before the end of the pause period to avoid further delays.

CHAPTER 8: COMMUNITY ENGAGEMENT AND CONSULTATION

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?

Yes, we agree in principle with the proposal for planning authorities to set out their overall approach to engagement as part of their Project Initiation Document, rather than in an SCI.

Setting out their approach in the Project Initiation Document will allow planning authorities to be more dynamic to the needs of the plan. Being able to set out engagement ambitions or aspirations rather than only commitments (as is the case with SCIs) will encourage planning authorities to be more creative about how they can engage, without the worry of a legal commitment to these methods.

We fully support the proposal for planning authorities to be ambitious in their engagement methods, as we have been trying to make our consultations more accessible, user-friendly and engaging by using digital methods to present our consultation material and to gain representations (including from those responded who wish to remain anonymous, at the earlier stages of plan making). We welcome the proposal to make a digital toolkit available for planning authorities which will provide learnings from the PropTech Fund, as well as further guidance on community engagement. This will help planning authorities to learn from best practice to improve their own engagement methods.

However, as the SCI currently covers not only local plan consultations but all methods of planning engagement, including on planning applications. Where will this additional information be set out with the removal of SCIs? It is still important that the public and other stakeholders can gain an understanding of how all planning engagement takes place, not only engagement relating to the local plan. The consultation has not set out any detail on where this information will sit with the removal of SCIs, and we ask for this to be clarified.

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 agree that engagement is beneficial, both to the council and also for stakeholders, and therefore having a new requirement for early participation in plan making could potentially be a positive way of gaining early engagement and influence on the plan.

Consultations and engagement can be time and resource intensive, and therefore we agree with the proposal that this early participation would take place prior to the commencement of the 30-month timeline, or it could make an already challenging timeline even harder to meet.

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

Yes, it would be beneficial for the outputs of the early participation to influence the Project Initiation Document, both in terms of the scope of the plan, and also in how engagement should take place. This would then ensure that those who have provided early thoughts on the plan can actually influence how it moves forward at the very beginning of the plan making process.

Regarding what approaches could help facilitate positive early participation, we think that utilising digital tools would one of the best ways to achieve engagement. They are often the most engaging, accessible, and simplest ways to gain wider engagement, particularly with those that are not the 'usual suspects' and gain a broader insight into the views of the community and other stakeholders. Utilising digital tools that are already used for contacting others, such as social media are particularly useful in gaining wider engagement and could help to facilitate early participation in plan making.

Allowing people to provide quick, but informed, responses, including anonymously will encourage participation. Ensuring the engagement is meaningful and can be tracked going forward also build confidence in the value of participation.

We consider that both proposed approaches to how the early participation could take place would be beneficial, however which one is best would depend on how formal government envisages this engagement to be. The first sounds like a more structured and formal consultation period, whilst the second is instead an informal, ongoing process, where the planning authority continually seeks views throughout the scoping process. The second may be more beneficial considering it is such an early stage of plan-making, and the ongoing sharing of thoughts and ideas may be most useful for influencing the scope of the plan and future engagement. However, ongoing engagement can come with challenges, as it is still necessary to draw conclusions and assess the outcome of the engagement at some point to ensure it is captured. Without the formality of a structured consultation period, it may be difficult to ascertain when this takes review place and when the engagement ends.

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

Consultation is a crucial part of plan-making, ensuring that the thoughts of the community and other stakeholders help to shape the direction of the plan and its content. Currently the two mandatory consultation stages, namely, Regulation 18 and Regulation 19, as set out in legislation are vague, simply requiring that representations are sought on plan content. Therefore, having these two consultation stages set out more clearly in the regulations would be helpful to ensure

that we fully understand what the expected role and purpose of each consultation is, and to also ensure these consultation stages are consistent across planning authorities in England. The proposed role and purpose set out in the consultation for these two stages reflects how we are already intending to undertake our Regulation 18 and Regulation 19 consultations, and it is therefore supported.

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

Yes, we agree that creating a series of digital templates to guide the form for representations would be helpful. Currently, one of the most time-consuming elements of plan-making is reviewing the representations to consultations. One reason why this is so time consuming is due to the various ways in which representations are received to us. Although we have a digital consultation platform, we also receive representations by email, and also written representations, sometimes individuals will use multiple methods or will duplicate representations through the different channels. These often do not follow the template we provide, which then takes time to register the response in the appropriate format in order to record it and review it. It would also be useful to have some wording in legislation which allows us to only accept representations if they are provided to us using the template, as having to consider representations in such a variety of formats makes it increasingly difficult to meet plan timelines. If the deadline is set at 30 months for plan-making, this would be even more important.

We understand that one reason why some stakeholders provide emailed responses that do not match our template, is because they submit numerous very similar responses across the country. Therefore, it is time consuming for them to submit their response in the various ways that is required for each authority, so they simply email their thoughts instead of setting it out in a template.

Having a national template would therefore not only benefit local planning authorities so we are able to review and process responses more easily, but also make it easier for those who submit responses to local plan consultations on a regular basis by introducing consistency in the format of representations.

The template would also need to be flexible enough so that we still have the ability to ask questions in different ways tailored to local circumstances where possible, and as such the template shouldn't be too rigid in its format. It would also need to be flexible enough to suit a range of audiences, from young people, to older people, to developers and so on.

There is also a notable lack of digital consultation platforms that are suitable for local plan consultations, and hosting these templates. We have found it difficult to find a digital platform that will both host our consultation content digitally in an easy to use, visual way, whilst also incorporating a representation form within it.

It would be helpful for government to invest in creating a purpose-built platform that all local authorities can use to host their consultations and template forms to tackle this issue, and also bring consistency to planning consultations. Secondly, we would welcome an effective digital solution for processing and considering representations which would help to make the process quicker and more efficient.

A privacy statement template would also be beneficial. As would advice on the processing and handling of personal data, and guidance on taking account of anonymous responses at the different stages of plan making.

CHAPTER 9: REQUIREMENT TO ASSIST WITH CERTAIN PLAN-MAKING

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

National Highways should also be added to this list, otherwise we have no further comments on the proposed list of prescribed public bodies, as these are all considered appropriate.

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

Yes, we agree with the proposed approach to set a 'requirement to assist' in plan-making for the prescribed bodies. Given the important work each of these bodies undertakes and key information they hold, they should offer this information and engagement when it is needed to inform the plan. Notifying them at the beginning of plan preparation is appropriate to ensure all relevant parties are aware that the plan is in development and that engagement is likely needed. It is also important that these bodies provide local planning authorities with updated contact details regularly, as we have found that there have been occasions when contact details are out of date and we have not been informed of the correct ones. Therefore, it would also be useful to require these bodies to provide us with up-to-date contact details at all times to ensure engagement can take place. Or for DULHC to centrally hold this contact detail, so every authority can access one source. This is a practical measure that would speed up plan-making. Additionally, if these bodies are statutorily required to assist, they should not charge local authorities for this.

CHAPTER 10: MONITORING OF PLANS

31. Do you agree with the proposed requirements for monitoring?

The current requirement to include some Community Infrastructure Levy information in an Authority Monitoring Report (AMR) is redundant. This information is already reported in the Infrastructure Funding Statement, where it is given in context with other CIL monitoring data.

We don't agree with the proposal to combine planning and environmental monitoring measures unless they are directly related. Combining too many measures into one report leads to either reduced context and analysis, or a bloated report which takes longer to produce; either outcome is less accessible and less useful to a reader.

We agree in principle with the concept of a focused annual report. Standard metrics should make comparison between planning authorities and the development/sharing of monitoring best-practice, easier. Guidance on supplementary local metrics should emphasise the need for focus and consistency to avoid replicating existing comprehensive reports or frequently adding new metrics.

Regarding the proposal of a detailed report, if it is intended to inform a future update of the plan, the content should be aligned with the evidence required for plan making. The proposed approach of leaving the scope and content entirely to individual planning authorities is inconsistent with the more prescriptive proposed approach to plan making evidence and annual reports. Additionally, considering where policies are no longer relevant should be part of the plan making/update process: subject to consultation, governance, etc.

We agree with the proposal for reporting templates, and believe they will support timely, focused reporting and make comparison between planning authorities easier.

We support a target date for reporting, which allows for some flexibility. We disagree with using the anniversary of plan adoption, as most annual monitoring data is collected on a financial-year or calendar-year basis. A target date in Autumn/Winter to avoid clashes with other work in the first half of the year (e.g., Housing Land Supply monitoring) and to allow time to compile the report would be preferable. This would also make comparison between planning authorities easier. The resources required to produce monitoring reports should be considered and support offered to planning authorities to facilitate production.

Regarding monitoring the success of the vision, we think that guidance on vision metrics should seek to keep the annual report focused and avoid duplication.

The proposal that the detailed monitoring report (every 4 years), should consider all outcomes set out in the planning authorities vision statement does not seem fully consistent with the proposal at 168.2 for the scope and content to be left to individual planning authorities. Will vision statements specify which measures are to be reported annually vs. in the 4-year detailed report? If vision statements are aligned with the plan making evidence, then that would be a reasonable basis for the detailed report. It is not clear if the detailed report is intended to consider every policy directly or indirectly via the golden thread of the vision statement, this should be clarified.

Regarding potential environmental metrics, no specific proposal is made. If interim measures are needed prior to Environmental Outcome Reports (EORs), we

recommend using data currently available from Environmental Records Centres (ERCs).

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?

Housing –

Net additional dwellings completed (including conversions):

Agree, this data or similar is included in current AMRs. Total number of dwellings permitted, not yet completed could be included.

Net affordable units completed:

Agree, this data or similar is included in current AMRs. Other tenures (e.g., affordable rent, social rent, shared ownership) could be included.

Proportion of new homes permitted on brownfield land:

Agree, this data or similar is included in current AMRs.

Net additional pitches & plots for gypsies and travellers:

Agree, this data or similar is included in current AMRs. Other forms of specialist accommodation (e.g., for students, older people) could be included.

Economy -

Net change in employment floorspace:

Agree, this data or similar is included in current AMRs. This metric should specify which use class(es) are included as employment; a metric could be added for any non-employment use class(es). N.B. applications are still being submitted referring to revoked use classes and Planning Portal forms have not yet been updated to remove these. This currently makes this metric challenging to measure.

Environment and Open Space -

Net change in designated open space:

Agree, this data or similar is included in current AMRs.

Net change in designated habitats due to development:

Agree, net change in designated habitats is included in current AMRs via data from Environmental Records Centres (ERCs). It may not be possible to specify whether a change is due to development.

Delivery of 10% Biodiversity Net Gain:

This will depend on timely and accurate reporting of biodiversity losses/gains by developers. Are there processes in place to ensure this data is available and accurate?

Progress toward net zero emissions from buildings (to be developed)

There is a lack of detail as to what this metric would require, as well as how and what emissions it would measure. A clear methodology for assessing the carbon emissions of proposed policies is required in order for this metric to be useful. It would also need to establish which carbon emissions should be considered as within the scope of planning. Therefore, more detail is required to allow us to establish an informed view on this metric.

Environmental Outcome Reports (EORs) -

Assessment of the contribution to meeting Environmental Outcomes and identification of any remedial action that needs to be undertaken:

As for section 165, this should be focused on Environmental Outcomes and remedial actions which relate directly to planning. Dedicated Environmental Outcomes monitoring may give a broader, more appropriate level of context and analysis.

CHAPTER 11: SUPPLEMENTARY PLANS

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?

Yes, we agree with the suggested factors which could be taken into consideration when assessing whether two or more sites are ‘nearby’ each other. Geographical distance is of course the key factor, however often two sites have a relationship with each other due to their interrelationship or interdependence on one another, i.e., shared services or facilities, such as transport links, doctors surgeries, schools etc., this should be taken into account.

There should be further information provided on how the common topics/information usually covered by SPDs that are not easy to incorporate into a local plan should be dealt with, for example Developer Contributions SPDs. Although the consultation states that ‘local guidance’ can be created, there will need to be clarity regarding the weight of this guidance, which in the past has been contested in court cases.

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.

For large strategic sites, design review would be beneficial in the preparation of supplementary plans which relate to design. A design review panel comprises a group of multi-disciplinary professionals who offer impartial advice on design proposals and key design issues. This would be a beneficial mechanism to help

shape supplementary plans for sites and design codes, as it would help to raise the quality of design, by identifying where it can be improved, as well as being able to recognise innovative design and help to resist poor design. This would also provide an opportunity for additional independent and objective voices to be heard from a variety of expert professionals in the built environment industry, helping to identify any issues early on in the planning process and support urban design officers in their analysis and decision making. This mechanism may not be useful for all supplementary plans so should be encouraged rather than required.

It should however be required that engagement events, either online, virtual or in person, should be undertaken for all supplementary plans to allow input from key stakeholders and the community. They should utilise innovative digital methods of engagement to make this engagement more accessible and appealing to those whose views are sought.

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?

Yes, we agree that a single formal stage of consultation would be sufficient for a supplementary plan, as they are usually smaller in scale than a local plan, and quicker to prepare, and therefore only one consultation stage appears appropriate. An additional stage should only be undertaken if it is considered appropriate, i.e., it is a large and/or complex supplementary plan which would therefore benefit from input at more than one stage of development. Alternatively, where there is a significant change in the direction of the supplementary plan following the consultation stage, it may be necessary to consult upon the plan again.

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.

Although thresholds could potentially be helpful, it is not always the case that the largest sites are the most complex or most contentious. This also applies to the proximity and interaction of the proposal to sensitive designations. A supplementary plan can sometimes help unlock delays where multiple landowners are present, even on small sites which can be contentious. Therefore, it instead would be more appropriate to consider each supplementary plan examination on its own merits, as to whether an in-person examination carried out by the Secretary of State is required.

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 set out in the consultation; it provides a proportionate basis for the independent examination of supplementary plans.

We particularly welcome the procedural requirement that requires the supplementary plan to ensure 'that local development and use of land contribute to the mitigation of and adaption to climate change'.

CHAPTER 12: MINERALS AND WASTE PLANS

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?

We are not a minerals and waste planning authority. The minerals and waste planning authority in Oxfordshire is Oxfordshire County Council and therefore they produce the relevant Minerals and Waste Local Plan. As such, we would advise you reflect on any response provided by Oxfordshire County Council for this question. However, we understand that they face similar challenges to local plans in terms of their preparation. Minerals and waste planning teams are often lacking resource and funding to efficiently undertake the preparation of plans, and therefore we encourage government to acknowledge and address this widespread issue in any actions taken on planning reforms moving forward.

CHAPTER 13: COMMUNITY LAND AUCTIONS

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

The process for Community Land Auctions proposed in the consultation appears acceptable in principle. However, it requires piloting to ensure it works, and also to test how popular this option will be with landowners. It is difficult to know at this early stage if this process will be successful. It may be more attractive for sites of a smaller scale, for example at neighbourhood level/for neighbourhood plans. This is something that should be explored by government.

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?

Although we understand why financial considerations could be an acceptable consideration, as they can help to enable delivery of infrastructure, we think that it is

crucial that they do not undermine the delivery of sustainable development and factors relating to it, particularly the responsibilities held under the Climate Change Act, as well as environmental factors, which should take precedent in the decision making process.

CHAPTER 14: APPROACH TO ROLL OUT AND TRANSITION

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

We wish to firstly emphasise that the 30 June 2025 deadline to submit local plans for examination under the current system should be extended by at least 6 months, as well as the 31 December 2026 deadline for adoption. These dates should be revised due to the delays from government in providing key information and detail on the proposed planning reforms via consultation so far. Additionally, most of the details surrounding changes to the NPPF have still not been released. As a result of these delays, local planning authorities have faced significant uncertainty surrounding the direction and scope of their plans, and how they can possibly future proof them despite the lack of information provided on proposed planning reforms. This has impacted decision making, and therefore led to delays in the plan-making process. We also believe the 31 December 2026 should be scrapped, as it creates a 'cliff edge' scenario where plans that do not meet this deadline will be abandoned, which should be avoided. Given the investment in plan making and evidence made to reach submission, it would be wasteful and expensive to implement a deadline that abandons plans that could potentially be close to adoption.

Regarding the options for roll-out, we think that it would be useful to have a small cohort of 'front runner' authorities to trial the plan-making process of preparing a new-style local plan. It would help to ensure all of the proposals are in fact achievable and beneficial (particularly the ambitious 30-month timescale proposed and the gateway assessments), and allow remaining authorities to gain learnings and best practice from those who have 'tried and tested' the new system.

It isn't clearly understood when the next cohort of planning authorities would then begin plan-making. The consultation states that the remaining authorities will be ranked chronologically and grouped into 25 authorities, all allocated to a 6-month plan-making window. Would this mean that only 25 authorities would begin plan-making after the 30 June 2025 deadline? If so, it seems unfair to stall the remaining authorities in plan-making during this time. If this is the case, those remaining planning authorities should be allowed to continue to progress a plan under the current system to avoid delays in updating plans. Would 25 more authorities begin plan-making every six months? When would the windows process cease, and allow all planning authorities to begin plan-making under the new system? The capacity of the Inspectorate also needs to be understood as to whether this is achievable. There is crucial detail lacking on these points to make an informed decision on the roll out of the new system.

We support the transitional arrangement proposed in the consultation. Ensuring local plans remain up to date for decision making purposes for 30 months following the five-year anniversary of their plan being adopted provides local authorities with the reassurance that they would be protected from speculative development during the new plan-making period. However, as previously stated, we do think the 30-month timeline is very ambitious. Therefore, instead of existing plans losing this protection after 30 months after they turn five years old, they should remain up to date for decision making purposes until the new-style local plan is adopted, as long as the authority is progressing with plan-making as much as possible. As authorities will be trying to get up to speed with a new planning system with such an ambitious timeline, it is expected that authorities are likely to take longer than expected to adopt their first new-style plan. Removing the 30-month cap will recognise and allow for this, and put less pressure on authorities at a time when they will be trying to understand and progress through a new planning system.

CHAPTER 15: SAVING EXISTING PLANS AND PLANNING DOCUMENTS

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

Yes, we agree that existing Development Plan Documents and saved policies should remain in force until the planning authority adopt a new-style local plan. This approach seems reasonable and allows a smooth transition between plans and documents made under the existing planning-system, and those to be made under the new system. It will give planning authorities adequate time to incorporate any policies and detail set out in separate DPDs into a singular local plan.

EQUALITIES IMPACTS

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?

Please provide a free text response to explain your answer where necessary. Is there anything that could be done to mitigate any impacts identified?

There is a strong focus in this consultation on moving towards digital plans, plan-making and digital consultation methods. This is likely to have a positive impact on those with protected characteristics as defined in the Equality Act, as it will make Local Plans, plan-making and plan consultations more accessible. However, it is also necessary to acknowledge the potential for, and aim to avoid, digital exclusion in the process of digitising the planning system as this could potentially impact on those with protected characteristics who do not have access to the internet or cannot access the internet or digital services.