

Annex 1- Specific consultation question responses

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

Agree. This would be beneficial to local planning authorities who have an up-to-date plan in place. At present the plan-led system can be undermined by the current requirement to continually demonstrate a deliverable 5-year housing land supply. This change will allow local planning authorities to focus on other areas and swiftly prepare local plans. However, further detail on what simplification of the operation of the 5-year housing land supply requirements is required.

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

Agree. Current buffer arrangements, based upon historic completions, ranging between 5 and 20% are inconsistently applied across time and authority boundaries, so is not necessarily measuring delivery on a like-for-like basis. This approach can also be counter-productive, with quite significant implications for local planning authorities on their annual housing delivery requirements, and therefore ability to meet these. Removal of the buffers would provide consistency and would not disproportionately impact upon local planning authorities who have struggled to deliver in recent years. However, this approach does not differentiate between under and over-performance as a proportion of the requirement.

- 3 Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?

Agree. This would be a consistent approach to under- and over-delivery. Delivery should be measured across the whole of the plan-period. Given that uncertainties increase towards the latter end of the plan period the ability to demonstrate delivery over the whole of the plan period through potential over-supply in the earlier years would be welcomed.

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

Additional planning guidance should be consistent but not too prescriptive, with the ability to monitor over the whole of the plan-period. It would be helpful if this was

alongside a consistent approach, including through the use of technology, to the production of housing trajectories.

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

Agree. This proposed change would align with the definition of 'current' for local plans (5 years), in terms of the housing requirement. However, neighbourhood plan coverage is not equal or consistent across the country and as they are not prepared by, or the responsibility of the local planning authority, then the local planning authority has little scope to ensure that they are up-to-date or contain the other information which would provide protection.

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

Agree inclusion of reference to homes, other forms of development and infrastructure as key elements of sustainable development, however some further definition of these terms and emphasising the importance of plan-making would be helpful.

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

Agree with maintaining the standard method for calculation of housing need and with the proposal to review the implications of new household projections for 2021, due 2024. The current standard method is based upon out-of-date population projections dating back to 2014, so should not form the basis of calculating housing need from 2023 onwards.

Agree with changes to allow local planning authorities to set housing requirements that respond to local constraints as well as demographic and affordability factors. However, it is important that the right balance is achieved, and that there are no unintended circumstances associated with this approach, such as displacing housing delivery away from the housing market where the need is generated. Therefore, it could be helpful to set out some further guidance on the definition and application of 'constraints' and how constraints such as the Green Belt should be considered in the context of housing affordability pressures and patterns of sustainable development, as well as the weighting of demographic and affordability pressures, possibly through local ratios with regional and national indicators, and trend data.

Agree with taking a more proportionate approach to local plan examination however this will need close definition and further information on how this could be streamlined. This would require either a new approach to examinations and new guidance for inspectors but would also need to filter down to local authorities to consider what evidence they need to prepare or is expected to support policy approaches in the context of the proposed removal of the 'justified' test.

Agree that local planning authorities who are granting enough permissions can be exposed to speculative development, therefore an approach that seeks to factor in the number of homes granted permission as well those delivered is welcomed. However, to ensure that the right homes are delivered in the right places, measurement of permissions needs to sit alongside, rather than replace, housing completion data.

- 8 Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

Agree that policy and guidance should be clearer on exceptional circumstances for use of an alternative approach for assessment of local housing needs. This would reduce the risk of misinterpretation and challenge. In terms of local characteristics, housing affordability should be considered as well as significant inward investment in economic development and nationally significant infrastructure projects, either within the local authority area or affecting the local authority area. However, at examination, there would be a need to ensure that there is no double-counting of constraints and affordability factors in light of the above proposed change that the housing need figure is a 'starting point'.

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

Agree. It is understood that the intention behind this proposed amendment is to remove any ambiguity around when local planning authorities are expected to review the Green Belt and when they are not. Welcome an approach which means that decisions relating to the principle of Green Belt release can be made locally based upon factors such as affordability, constraints and sustainable development.

However as is currently drafted there is still a degree of uncertainty. The proposed tracked changes to the NPPF stipulate that these boundaries are 'not required' to be reviewed when this is the "only means of meeting the objectively assessed need for housing over the plan period". Therefore, suggesting that altering the boundaries could still be a requirement to facilitate the delivery of other uses or infrastructure.

The use of the term 'not required' to amend Green Belt boundaries as opposed to wording such as 'should not' suggests that there is still scope for a local planning authority to amend these boundaries if it so wishes. This results in some uncertainty over what is necessary to demonstrate compliance with national policy in this regard.

The proposed wording, and how it is interpreted, may also cause tensions with existing unchanged national policy in paragraphs 144 and 145 (as per consultation document), in particular in relation to promoting sustainable patterns of development (paragraph 144) and demonstrating that Green Belt will not need to be altered at the end of the plan period (paragraph 145). Further amendments therefore may be required to avoid differing emphasis or interpretation of these considerations.

Removal of the housing delivery argument within the 'exceptional circumstances' test would effectively set a higher bar to be justified through the plan-making process. Further clarity on the form of evidence required to under-pin this decision-making process is therefore required, especially in the context of the proposed removal of the 'justified' test. For clarity, 'exceptional circumstances' should still remain distinct from the 'very special circumstances' in development management decisions. The absence of which could have unintended circumstances for the 'plan-led' approach.

Agree with the proposed amendment that it is not necessary to build at (out of character) high densities only to meet housing need. The ability to make planning judgements relating to 'out of character' development will rely upon having appropriate evidence around existing character in place, prior to the development of the local plan. This could result in some delays to plan-making.

This proposed amendment is effectively the 'other side of the coin' to the Green Belt amendment. As in the case of the Green Belt, a local planning authority should also be able to put together a case to justify when it is appropriate to build at specific densities to meet wider objectives. Therefore 'exceptional circumstances', or similar, for building at higher densities should also be considered. To do so effectively there is a need for additional guidance to recognise the role that good design can play in mitigating the impacts of higher-density development and how this should be demonstrated through an evidence-based approach.

Agree with taking into account past over-supply from a previous plan-period. This approach would be consistent with the proposed amendments around the 5-year housing land supply. This further justifies the need for a consistent approach to longer-term housing monitoring through a standard approach to the production of housing trajectories.

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

As above, making a judgement on 'out of character' would require evidence on existing character. Local planning authorities will increasingly be drawing upon characterisation studies in support of their emerging design codes, so this evidence can also be utilised. A judgement will also need to be made on the degree of significance and the harm which may arise. As above design can also play a role in mitigating impacts of density, and some of the most innovative and forward-thinking designs can also be of differing character to the existing area.

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

Disagree. It is questionable whether removing the 'justified' test would facilitate a proportionate assessment of plans at examination. The absence of this test means there would be no basis for assessing whether the strategy is appropriate and whether the evidence base is 'proportionate'. Many of the elements of this test are also covered by other legislation, such as the Environmental Assessment of Plans and Programmes, 2004 which requires assessment of 'reasonable alternatives'. Therefore further clarity is required on what would or would not be expected in support of plan-preparation. This is quite a considerable change and in the absence of this a cautious approach is likely to be adopted by many local planning authorities regarding production of evidence and justification of decision-making, with time and cost implications.

12 Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

Unsure. Further clarity on the tests and the implications of the changes is required before a decision on what is applied at each 'gateway' decision-point. However, much of the plan-making has taken place by the time of the pre-submission consultation stage. It would be unreasonable to assess the soundness of a plan against revised tests that were not in place for the majority of plan-making.

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

Unsure. Although not specifically relevant to this this local planning authority, an uplift intended to make the best use of brownfield land should use brownfield land availability as the measure, rather than an arbitrary 'top 20' towns and cities. This section discusses the removal of the duty to cooperate with an 'alignment policy' as its replacement in the context of the uplift. This is an important change for all local planning authorities, and at present it is difficult to comment on the implications of this without further detail on the replacement.

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

No comment.

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

No comment.

- 16 Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

Agree. Although this is not relevant to this local planning authority it is reasonable to reflect those authorities in an advanced stage in plan-making who may be required to make amendments.

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

Agree, additional guidance on constraints would be welcome in support of the transitional arrangements.

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

Agree, however emphasis should still be placed upon completions.

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

A clearer understanding of how the 115% figure is derived would be helpful. Given that housing markets differ in strength across the country, it is questionable whether it is reasonable to apply such a blanket figure.

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

A consistent approach to counting permitted homes would be required in support of a 'switch-off', however this should avoid repetition of existing data-collection processes. There is potential for use of technology to develop this.

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

The right and fair approach would be for the amended consequences, in particular the removal of the 20% buffer where delivery falls below 85%, to follow from the publication of the 2022 Test. However, any changes should ensure that it does not result in aborted work for local planning authorities.

22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

Agree. Social rent and other similar affordable rented products should be the highest priority of the planning system. Social rented accommodation can genuinely help those households in greatest need through the allocation process. The need for this change is particularly stark in high value/cost regions such as the South East, and the consequential negative uplifting effects on rental values. Focus and prioritisation of genuinely affordable social housing, social rent, could help address some of the unintended consequences previous changes to the definition of affordable housing have had on delivery of genuinely affordable products.

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

Agree, however this should be considered in the context of the longer-term impacts of the introduction of enhanced accessibility requirements through Part M of the Building Regulations (and any future amendments?) whereby more homes will be accessible or suitable for adaptation. There is a need for a clear definition of the term older persons housing, and what housing forms, typologies and financial models would fall within this definition. The planning system should enable the provision of the full spectrum of products and evidence would be required to support the particular approach adopted within each area, based on the local demographic.

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

The aim of the current requirement for 10% of sites through the development plan and brownfield registers to be smaller than 1 hectare is to ensure a varied and flexible supply of housing sites, and to avoid market absorption. The effectiveness of this approach will differ by location and the supply of land for development. Future revisions to this approach should ensure that this does not increase the burden for local planning authorities by requiring a greater number of sites to be allocated within the development plan to demonstrate compliance, rather than through windfall allowances.

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

This paragraph may also need reviewing in the context of the proposed removal of the 'justified' test because as currently worded, requires justification around what can and cannot be achieved. The current wording is arbitrary and does not reflect local conditions, and potential outputs from such sites, ie densities. Clear local definitions of small and medium sized sites would be more beneficial than being set at a national level. Therefore more specificity within this paragraph is not required. A strategic approach to delivery with guidance for potential developers outside the statutory planning system may have more impact.

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

Any changes to the definition of affordable housing for rent to be provided by registered providers should be carefully limited to specific groups or types of organisation, ensuring that the affordability criteria are still met. The regulation that comes with Registered Provider status and the housing Regulator is important to ensure standards and that mechanisms and scrutiny are in place for monitoring and addressing any performance issues. Equivalent regulation would need putting into place for any other organisations.. The end products also need to remain as affordable provision in perpetuity.

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

No. The current policy, alongside planning practice guidance provides sufficient support.

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

Funding for housing needs surveys/research to inform proposals would assist.

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

One of the main challenges for community groups wishing to develop their own housing is land availability and the ability to purchase at the right cost. The scope of national planning policy to tackle these issues is limited, however support is provided for self-build and custom-build which could be expanded to specifically cover community land trusts.

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

No. A planning application should be determined on its merits, and in accordance with the development plan- as clearly set out within legislation. There are many reasons why permissions are not built out and many of which would not fall into the category of 'irresponsible behaviour'. It is unclear and outside the scope and role of a local planning authority to assess whether an applicant has acted in this manner.

Introducing such a consideration in decision-making would also be contrary to other measures also proposed within this consultation, such as the housing delivery 'switch-off' where a local planning authority has granted sufficient permissions, and therefore would be counter-productive to demonstrating housing land supply. It is not clear whether this approach would be able to meet legal duties whereby a local planning authority would effectively be refusing to consider, or give balanced consideration to the application presented to them.

31 Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?

Disagree with both these options for the reasons as above.

- 32 Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

Disagree. It is unclear how publishing data on the developers failing to build out will incentivise them quicker delivery, however if this was introduced it should be accompanied by the detailed circumstances around each case. However this could then become a burden for the local planning authority. It is unclear when the explanation around housing diversity would be triggered. This would have to be before the grant of permission, in which case this should be already covered by the housing policies within the local plan, so should be plan-led. The ability to refuse applications with slow delivery rates would be counter-productive to the aim of granting permissions and delivery of housing. It is unclear what information a local planning authority would be using to disprove what is proposed by the applicant and in many cases there may be genuine reasons for a slow delivery rate, especially during the early years of a development.

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

Agree that the role of place-making should be strengthened, however good design is about much more than aesthetics. Therefore using terms such as 'beauty' and 'ugliness' are subjective and open to interpretation.

The heightened priority for design coding is supported, however the degree of detail and complexity required if needing to cover all aspects of permitted development would increase, as would the time taken to develop design codes.

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

Disagree. 'Well-designed' is all encompassing and sufficient. Not only is the use of the term 'beautiful' subjective but could have cost implications on application. For example, if this is interpreted as requiring the highest quality and costly materials, or the most renowned design teams.

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

Agree. This is a sensible approach.

- 36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

Disagree. This is too detailed for inclusion within national planning policy, and where local circumstances dictate, this could be covered under design coding. There may be innovative design solutions that could achieve the same objectives.

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

National policy and guidance on small scale nature interventions should be strengthened to take account of existing impacts of climate change on wildlife, such as the extreme heat, drought and wild fires (such as experienced in 2022). This is necessary to ensure that areas identified for restoring or enhancing habitats are suitable for supporting flourishing plant, wildlife and insect species as they are introduced by local areas, and that these continue to provide viable habitats in the coming decades. National guidance should take account of these current and future impacts in the design, positioning, mix and new options for small-scale nature interventions, however there is also potential to introduce through regulations.

A balance needs to be struck between impacts on habitats and the most efficient use of land, for example, for playing pitches artificial pitches can allow intensified use.

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

Agree. The role of the best and most versatile agricultural land should be an appropriate consideration in plan-making and decision-making. However a balance needs to be struck with other factors such as facilitating sustainable development patterns, meeting needs and impact on protected sites, for example. Therefore some additional guidance on this balance would be helpful. A clear distinction needs to be made between land which is currently in the most effective and productive agricultural use, and short, medium and long term availability for such future use.

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

The approach would need to be underpinned by evidence. At the plan-making stage, as well as the consideration of sustainable development patterns, site selection processes and policy options would also need to be considered against their associated carbon impacts.

For planning decisions this would need to include evidence relating to site clearance and preparation; embodied carbon; operational emissions; and monitoring of associated emissions post construction. A proportionate approach should utilise existing tools to estimate carbon impacts, likely with a greater emphasis on circular economy principles and lowering embodied carbon through reuse, recycling and minimising waste. However there would also be a need to reflect local conditions and availability of adequate processes and resources to maximise uptake; the size, form and scale of the development; as well as the limited resources for carbon assessments in smaller and/or rural Local Authorities. A simple points system, or minimum benchmarks, would assist with assessing carbon plans, alongside recognised and readily available methodologies, toolkits, guidance and data.

Monitoring and assessments of actual realised carbon savings (or increases) are equally vital for evidence-based planning that minimises current and future climate impacts. For example, avoiding developments which assume low private transport-related emissions without sufficient public transport or active travel options. Requiring the on-going monitoring and assessment of emissions and efficiencies through maximisation of in-built technology could be required through enhanced use of S106 or planning conditions.

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

National planning policy could be made explicit to emphasise the need for mitigation and adaptation to existing and future climate change impacts whilst seizing the opportunity to integrate climate change adaptation measures with other nature-based solutions including biodiversity net gain, green and blue infrastructure, with design codes and living street principles.

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

Agree to amendments to enable the re-powering of renewable and low carbon energy where planning permission is required. The changes are welcomed although the policy needs to be more proactive in its support for onshore renewable and low carbon energy production. Decisions relating to onshore wind should be taken at the national level to facilitate the most effective outcomes and performance.

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

As above.

43 Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?

Neutral. From a climate change point of view this proposed change is supported, however as above these decisions should be made at the national level to secure the most impacts.

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

Agree. However, the impacts of this could be limited as many building adaptations would be outside the scope of the planning system.

45 Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

Agree with the proposed timeline. However, the ability of local planning authorities to get their plans through the examination process by particular dates also depends on external factors such as the resources within the planning inspectorate and compliance with other future changes to national policy.

46 Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

Agree. However further detailed is required in relation to what would constitute 'commencement' of work on new-style plans and what evidence prepared under the current system could be used in support.

47 Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

Agree with consistency of timing for neighbourhood plans.

48 Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

Further clarity on the role of supplementary plans is also required, in particular in relation to the preparation process, degree of scrutiny and expectations regarding timing. The wording is not entirely clear in relation to whether they would fall part of the statutory development plan. The absence (and fall away) of SPDs could leave a policy vacuum, especially in relation to topic-based SPDs such as affordable housing and development viability. This may mean that local planning authorities would be required to include this detail within their new style local plan, and the ability to do so within such a swift 30-month timeline is questioned.

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

Agree in principle to the scope and principles for guiding policies, however more detail is required. However, local communities do want to have a say in plan-making within their areas, so new style local plans will need to focus on local issues and be framed in such a manner to avoid repetition. Setting of clear development management principles would also be beneficial to local planning authorities who do not have an up-to-date plan, however they will need to be applied consistently in decision-making across the country.

Support the retention of the optional technical standards to be set locally through local plans.

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

Support as above.

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

Agree that selective additions should be applied, however a per the list some matters do not appear to be sufficiently strategic in nature, for example allotments.

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

No other issues identified. However reference is made to the new 'gateway' approach as a means for explaining local policies. More information around this is required.

53 What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

There is an absence of focus on health and wellbeing within this consultation document. This could be strengthened to assist in supporting the levelling-up missions.

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

There remains an additional need for more localised 'levelling up' to recognise pockets of deprivation within otherwise seemingly prosperous regions. The framework and its requirements should facilitate locally-led, innovative policy responses, reflecting the latest trends and technologies. However, this needs to be supported by a package of measures at a level where it will have impact, across the country. This cannot be achieved through planning policy alone. The framework should support the development of skills, matched to the local employment offers and direction of growth, whilst being realistic about migration trends and the inputs and outputs of market intervention.

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

Agree, however 'gentle densification' needs to be framed around facilitating a mix of uses, not only about housing delivery. Making the most efficient, and appropriate use of brownfield land, within city and town centres as a driver for vibrancy, social interaction and healthy lifestyles. However, the rural economy should not be overlooked in this, whereby some of the same principles of efficiency are also valid.

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

Agree, some innovative approaches to community safety are being developed through design and the location of uses. These principles can be applied at a

national level, however conflicts with secure by design principles also need addressing to be most effective.

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

Support the use of technology and maximisation of the integration with other systems currently in use. Further detail on the timing and detail around other proposals set out within the document as 'aspects of policy which may require updating', including suggestions around the 'alignment policy' and soundness test amendments. Other areas of particular interest relate to any future proposed amendments to economic development and employment land sections, which should reflect modern supply chains and connectivity, and sustainable transport solutions.

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

This should be integrated into the process from the outset.