

Department for Levelling Up, Housing and Communities consultation on: Levelling Up and Regeneration Bill: reforms to national planning policy and National Planning Policy Framework changes

Response from Officers of West Lancashire Borough Council 01/03/23

	Question	WLBC Response
1	Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?	Agree this is a sensible measure. Ensuring that effort is made to ensure a health supply of housing is important and there should be tests of housing delivery. However, the adoption of a Plan is a difficult and lengthy process and the possibility of newly-adopted policies being deemed out of date through virtue of not being able to demonstrate a 5YHLS is unfair and does not incentivise local authorities to keep plans up to date. Particularly when there are many factors at play in relation to granting and delivering housing sites, many of which are outside the local authority's control.
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 - the need to identify an additional buffer of land creates an unreasonably high bar and makes it even more difficult to demonstrate a reasonable housing land supply. There is logic in identifying a buffer to take account of slippage in delivery or the non-implementation of some sites but this should already be taken into account when assessing deliverability and the choice of sites to include in the 5YHLS. Therefore an additional buffer should not be applied to take account of under-delivery (which is not wholly within the control of the local authority).
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 that oversupply in an earlier period should be taken into consideration when calculating 5YHLS. Some consideration may need to be given to the spatial distribution of delivery i.e. if there is a disproportionate amount of delivery in one area and very little in others; an averaging out of delivery over a longer period than that used in the Housing Delivery Test could be an option
4	What should any planning guidance dealing with oversupply and undersupply say?	Should take account of spatial distribution of delivery, wider economic and other factors that are outside the local authority's control
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?	No comment
6	Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the	No comment

	Question	WLBC Response
	homes and other development our communities need?	
7	What are your views on the implications these changes may have on plan-making and housing supply?	The proposed changes are in danger of exacerbating existing uncertainty and delays in plan-making. If the Government wants a system where plan-making provides more certainty, it needs to make the plan making process more, not less robust. For example, watering down the tests of soundness so that plans do not have to be 'justified' or meet fully meet objectively assessed need could lead to Plans that are less robust and more vulnerable to challenge or interpretation. With more emphasis being placed on the wishes of the community in making decisions, would need to be clear that all sectors of the community should be represented and have their needs met; danger that certain vocal groups who may be against development (even when this is shown to be needed e.g. to provide a range and mix of housing to widen choice and improve affordability or to provide for a range of groups in the community) may dominate arguments during plan-making. This could also lead to uncertainty and delay.
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?	Anything that makes policy and guidance clearer is beneficial but reserve comments until see further wording. Consideration must also be given to whether limited Green Belt release could be less environmentally/socially harmful than development of non-Green Belt which has higher ecological, heritage, open space etc. value
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?	Disagree. Green Belts were first designated decades ago and given significant changes in circumstances and development pressures in this time, including pressure on urban open spaces, it is only right that they should be subject to at the very least a review to ensure the land still meets the five purposes of Green Belt set out in national policy, if only to ensure that all potential land sources have been explored, particularly if this could create more sustainable development than alternative non-Green Belt land. This should still be subject to the proviso that changes to Green Belt should only occur in exceptional circumstances and have to be thoroughly justified. The wording could suggest that Green Belt should not even fall under consideration which should not be the case. It should be recognised that Green Belt is not a landscape, environmental or recreation designation in itself and in some cases release of Green Belt, which otherwise may have little biodiversity or other value, could be preferable to development of alternative non Green Belt if this has higher environmental, heritage or open space value. It will be very difficult to make a general assumption about the character of an area and to be able to determine if densities are out of character. This could require a large scale assessment of character at different geographical and individual scales which would require a great deal of resource. See previous comments on over-supply and community need.

	Question	WLBC Response
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?	It will be very difficult to make a general assumption about the character of an area and to be able to determine if densities are out of character. This could require a large scale assessment of character at different geographical and individual scales which would require a great deal of resource.
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?	Reducing the need for evidence to demonstrate that Plans are 'justified' or meet fully meet objectively assessed need could lead to Plans that are less robust. However, the existing need to provide a great deal of evidence, which can quickly become out of date is very costly and time consuming and some reform of this would be beneficial, perhaps through the ability to undertake joint studies with neighbouring authorities, particularly for cross-boundary issues such as transport networks and ecological networks.
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?	The proposed changes are in danger of exacerbating existing uncertainty and delays in plan-making. If the Government wants a system where plan-making provides more certainty, it needs to ensure the plan making process is robust and evidence-based. Watering down the tests of soundness so that plans do not have to be 'justified' or meet fully meet objectively assessed need could lead to Plans that are less robust and more vulnerable to challenge or interpretation once adopted.
13	Do you agree that we should make a change to the Framework on the application of the urban uplift?	n/a
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?	n/a
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?	n/a

	Question	WLBC Response
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 that if a Plan has been submitted for Examination or has been through a consultation which has identified proposed allocations to meet housing need (but the existing housing requirement in strategic policies is more than five years old), it makes sense to only have to demonstrate a four year supply of deliverable land. Towards the end of a Plan period but whilst an emerging Plan with proposed sites is going through the adoption process, then the supply of available allocated land which could be permissioned can start to dwindle. This would provide a reasonable stop-gap until new sites become available.
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?	Assume this is referring to constraints such as the change to NPPF (now para. 142) which states that Green Belts are not required to be reviewed if this is the only means to meet the objectively assessed need. During the transitional period, emerging Plans which are aiming to be submitted by the deadline of June 2025 should fall under the 2021 NPPF. Otherwise they are caught between the new and old systems which will greatly increase uncertainty and increase the risk of not meeting the adoption deadline set out in 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?	Planning authorities should not be penalised for low delivery where the issue lies with the implementation of sites (in an area which otherwise has granted sufficient permission) but more detail will need to be provided in order to come to a view.
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?	Needing to meet 115% of the housing requirement (with the 15% being based on evidence from an analysis of planning permissions which are not progressed) is fairer than the buffer which are currently applied i.e. up to 20% for those authorities failing to meet the HDT. However, clear guidance on how permissions are to be counted is required. Unsure what the purpose of the HDT will be if permissions can also be included - the HDT was supposed to ensure that actual delivery was being tested, rather than just permissions (which may be speculative or unimplementable)
20	Do you have views on a robust method for counting deliverable homes permissioned for these purposes?	Already do this as part of five year housing supply calculations but there would need to be clear guidance on how this will be monitored as part of the Housing Delivery Test

	Question	WLBC Response
21	What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?	No comment
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?	Yes, some weight should be presumed in favour of social rent but with the LPA being able to consider each application on its merits.
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 in principle but this will require more resource to determine the number of specialist homes which need to be provided. Also need to understand how a Plan will ensure this as currently this type of provision tends to be developer-led and come forward on an ad-hoc basis - will Plans be expected to have specific allocations for this type of provision which are safeguarded for this use?
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)?	Unclear how effective this currently is as small sites can naturally come forward as windfall sites or be covered through criteria-based policy, rather than having to be specifically allocated. If Plans are expected to be shorter simpler documents, they should focus on the larger allocations whilst continuing to support smaller developments. There is inconsistency with the definition of a "small site" for the purposes of plan-making and identifying potential allocations - it could be a "non-major" site as defined in the NPPF i.e. fewer than 10 dwellings / less than one hectare or a site of fewer than 5 dwellings as defined in SHLAA guidance.
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?	No suggestions
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?	The Council would not support changing affordable housing for rent definition as a "quick fix" way to make it easier for community led organisation to develop affordable homes. The Council supports the principle of community led organisations and almshouses providing community based affordable housing but considers that any flexibilities introduced to make life easier (generally supported), should be well thought out and consider wider issues such as their inclusion as part of the housing regulatory framework, so that the quality and management of such homes is benchmarked with the core standards expected of Registered Providers.

	Question	WLBC Response
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 suggestions
28	Is there anything else that you think would help community groups in delivering affordable housing on exception sites?	Often such groups require practical support to be able to organise themselves and understand what is required, not only in creating a planning submission but also seeing the application to fruition where the accommodation and tenancies have to be effectively managed. Perhaps Government may wish to fund rural enabler type activity to help increase the supply / help build capacity in support of community led developers and almshouses.
29	Is there anything else national planning policy could do to support community-led developments?	No suggestions.
30	Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?	This appears difficult to establish objectively, and we would be unsure as to what thresholds and standards might apply, and how these may be viewed as material considerations by a Planning Inspector who may be open to different behaviours exhibited to them as opposed to during the determination period itself. Equally, the behaviour of third parties is another issue that can impact on decision making and could be considered too subject to an understanding of the relevant thresholds/standards. It may be sensible to strengthen the terms of Section 70A-C to enable the resisting of repeat planning submissions, and there would also be support for increasing fees on applications submitted retrospectively, to reflect the increased time and effort often spent on such proposals, and greater sanctions for certain breaches of planning control.
31	Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?	Q.30 explains certain alternative measures but the second option is preferable, as it offers a clear route of challenge and is a less subjective criterion. The first option is too vague and will lead to confusion and open up difficulty for third parties who would find it more difficult to understand the reasoning behind the outcomes.
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?	Which service is expected to monitor the build out of sites - will it go back to Development Management to follow the progress of sites which have been granted permission. Will this form another return to Government (as the current requirement to report quarterly housing completions) which may need additional guidance and resource? Point (a) is toothless. Publishing a list of developers won't have an impact on delivering homes that are needed. There are many factors as to why housing delivery does not progress as quickly as forecast and leaving LPAs with the prospect of refusing planning permission for a national housebuilder who has built out homes slower than they anticipated could lead to sites remaining undeveloped and housing delivery slowing down. Point (b). Developers do not entirely control the rate at which homes are sold; it would not be in their interest to spend a lot of money applying for planning permission for units that may not be sold once built. Point (c). It is not in the interest of the developer to tell the LPA that they will not be delivering houses at a reasonable delivery rate. What is a "slow" delivery rate? How would this be measured or benchmarked? The speeding of housing delivery is in our opinion likely to be better achieved by exploring opportunities for LPAs to give

	Question	WLBC Response
		increased certainty and greater flexibility to developers in both policy making and planning application processes. The processes need to be far more front loaded and leave less to the finalising of planning conditions and legal agreements all of which contribute considerable delay to the process. Such an approach risks becoming a further burden on top of those already existing for all engaged in the process and is tilting towards a numerical approach at odds with the general thrust of policy elsewhere that seeks to emphasise quality over quantity
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?	The stronger emphasis on design quality is generally welcomed but it will be important that LPAs are afforded the necessary resource to produce design codes to support their aspirations, and once they have done so are properly supported when seeking to resist development that clearly fails to conform to these.
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. It represents the wrong approach and sets a potentially very arbitrary standard that many perfectly acceptable developments may struggle to meet. It will also open up additional third party criticism of development that has no realistic possibility of meeting this standard and would also likely add further impositions to housing delivery, particularly amongst volume builders who have a critical role to play in ensuring a strong level of delivery. The use of this word is likely to mandate LPAs to refuse applications for standard house types.
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 may be best achieved by a review of national validation requirements were reviewed to require developers to give better information and afford LPAs stronger powers to decline substandard applications where the appearance and intent of the submission appears unclear. It would also be helpful to re-consider and refresh the role of Design and Access Statements and afford consideration to them representing part of the schedule of approved documents where appropriate.
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?	Accepting that rights to extend upwards are now already in place, this is seldom taken up in rural/semi-rural authorities, and where LPAs have been minded to refuse there is a clear lack of consistency amongst Inspectors in terms of the manner in which they reach the decision, both on technical fronts and on their merits. A neighbouring authority has successfully resisted a mansard extension at appeal and such roof extensions have to have regard for their particular setting rather than simply being advanced on a blanket basis. As a more general point upward extensions tend not to reflect the increased need of people for outdoor space, which became a stark issue in the early stages of the Covid pandemic, and can place pressure on already reduced areas for washing, drying and general relaxation, which should be afforded greater weight in the general list of material considerations should there be a push for extensions that increase building heights to achieve further accommodation.

	Question	WLBC Response
37	How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?	The suggested measures offer wide ranging health and well being benefits and national policy for planning should be written to strengthen this as a material consideration on which LPAs can build their own suite of localised policies and measures that will support increased opportunity for BNG on a local level. The question relates artificial grass as an example and this gives rise to no sustainable benefits but whilst LPAs can plan this out of the development initially there are practical issues to address with those who wish to install it subsequently, unless the GPDO is amended, say, to offer some parallel to existing measures that reduce opportunities for hardstanding.
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?	<p>The references to the food production value of high value farmland continue to be inadequate in the draft NPPF. There is a disconnect between the UK's food strategy which indicates the need to maintain a high degree of food security and the statements in the draft NPPF. The latter merely indicate a need to recognise the economic and other benefits of the best and most versatile agricultural land (paragraph 177) and consider the availability of agricultural land used for food production in plan making and decision taking. In practice, such language (recognising and consider) has and will continue to result in considerations of (high) agricultural land quality being subservient to other policy matters. Of course, such land may also be subject to (other) policy designations, for example in our own case significant areas of designated Green Belt, but the value of the highest quality agricultural land should be recognised for its strategic and economic value to the nation. In practice, the current wording of paragraph 177b) of the NPPF falls short of achieving that.</p> <p>The national agricultural land classification maps show a relatively modest geographical coverage of Grade 1 (Excellent Quality Agricultural Land) which is land with little to no limitations to agricultural use, can support a very wide range of agricultural and, importantly, horticultural crops and derive consistently high yields. The national map shows more, but not significant, coverage of Grade 2 (Very Good Quality Agricultural Land) with minor limitations to crop yield. This land (Grades 1 and 2) is a national resource and therefore should be recognised as such with elevated policy protection by the NPPF.</p>
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?	No comments.
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?	Recent and proposed policy changes to support climate change adaptation are encouraging, for example Planning Practice Guidance revisions and updates in relation to flood risk and coastal change and elevating the support for the implementation of multifunctional Sustainable Drainage Systems. Providing policy is kept under review to ensure robustness and to incorporate advancements in best practice, such as relating to natural solutions, the direction of travel is satisfactory.

	Question	WLBC Response
41	Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?	Agree
42	Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?	In sentiment yes; however, in practice we have reservations regarding the availability of recorded information relating to the baseline existing on site needed to assess impacts.
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?	<p>Agree with footnote 62.</p> <p>Disagree with changes to footnote 54 as this is currently incompatible with proposals to no longer allow the preparation of supplementary planning documents (SPDs) and the proposed expiration of existing SPDs, upon which views are sought as part of this consultation at question 48.</p> <p>For the avoidance of doubt, the Council's disagrees with the proposed transitional arrangements for SPDs upon which views are sought at question 48. Should the alternative approach put forward by the Council at question 48 be accepted then, of course, footnote 54 would be agreed as representing a sensible approach.</p>
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 with proposed paragraph 161.
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?	<p>Disagree. We agree with the proposed deadline of 30 June 2025 to submit plans for independent examination under the existing legal framework.</p> <p>However, we disagree with the proposed date of adoption of plans (subsequent to the conclusion of independent examination) by 31 December 2026 and consider this should be extended by a further 6 months to 30 June 2027. Producing local plan, particularly in reaching and successfully navigating Examination, represents a significant investment by a local authority in terms of staff and financial resource. In order for a plan to be found sound, an Inspector may require additional evidence to be produced by the local authority or Major Modifications to a local plan, which would need additional public consultation. These matters can be time consuming.</p> <p>In seeking extensive and up to date development plan coverage nationally it incumbent upon the Government to do all it can to support local authorities in the demanding undertaking of plan production, which has increasingly been carried out by (significantly) understaffed local authority Planning Policy teams. Extending the adoption date by 6 months to 30</p>

	Question	WLBC Response
		<p>June 2027 for plans being prepared under the current system would assist in managing the risk of avoiding expensive and time consuming failure to meet the adoption deadline. As a benchmark example of a neighbouring authority, the relatively recently adopted St Helens Local Plan was submitted for Examination in October 2020 and adopted in July 2022, a period of approximately 20.5 months which would have failed the now proposed timescale of 18 months for adoption from Submission.</p> <p>Moving the adoption deadline for plans being progressed under the current system to 30 June 2027 would align neatly with the timeline for the adoption of new style plans if plan production under the new system commences at the end of December 2024 (end December 2024 plus 30 months to adoption equals end June 2027). This proposal would still mean there would not be an overlap of plans still being in the process of being adopted under the current system after the date for adoption of plans under the proposed new system and would facilitate the Government's objective to have timely national development plan coverage.</p>
46	Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?	Agree in principle with the transitional period but it is unclear how the changes to the NPPF which are proposed to come into force in Spring 2023 and which could affect Plan-making (as they could affect choices over spatial strategies) will affect emerging Plans and what they will be examined under.
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
48	Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?	<p>Disagree, what is proposed is of significant concern because it is totally impractical and will create a policy void with significant associated problems.</p> <p>Supplementary Planning Documents (SPDs) provide complementary support to and more detail than contained in Local Plan policies. They cover a wide range of subjects including a range of design considerations (householder development, shop fronts etc), Local Lists, site specific briefs, standards relating to trees etc. They can also provide the mechanism for the implementation of voluntary off-site developer contributions towards recreational disturbance avoidance and mitigation on European designated habitats sites resulting from new residential development e.g. Suffolk Coast. Mitigation of such effects is a legal requirement under the Habitats Regulations.</p> <p>Already stretched and understaffed local authority Planning Policy teams will be deploying resources towards producing local plans under transitional and new arrangements and will not have the additional resources to produce new style Supplementary Plans to replace SPDs that are about to cease. Indeed, it is not clear whether these Supplementary Plans would necessarily be the appropriate means to do so. Additionally, it is highly unlikely that the level of detail covered by</p>

	Question	WLBC Response
		<p>a range of existing SPDs could be incorporated into (new style) local plans or be meaningfully replaced by a suite of national Development Management policies. Hence, locally a planning policy void will result.</p> <p>A much more appropriate alternative arrangement would be to require local authorities to list all existing SPDs, outlining which ones will cease upon the adoption of new local plans alongside a timeline for the replacement of those that will temporarily remain in force and the form of their replacement e.g. by a Supplementary Plan etc.</p>
49	Do you agree with the suggested scope and principles for guiding National Development Management Policies?	The idea of National DM policies is reasonable in principle, but there is a risk of them not being responsive to or reflective of particular local dynamics. At present, the general principles of part 2 of the Framework appear to work quite well in setting the tone for decision making, and afford clarity over the various triggers and exceptions to the permitting of sustainable development. If general policy statements centre on this content and are perhaps brought up to speed to tackle climate change and zero carbon in more detail there is perhaps a place for them but they must not become an impenetrable obstacle for those wanting to promote acceptable development and should be written carefully to avoid stifling LPAs who are promoting their own approaches for the right localised reasons.
50	What other principles, if any, do you believe should inform the scope of National Development Management Policies?	See response to Q.49
51	Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?	Agreed but with a note of caution over the increase of housing in town centres and built up areas. Recent deregulation of the planning process has generally reduced the role of the town centre in terms of its retail / leisure function and its importance for other social interaction and any new measures cannot be seen to diminish this further.
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?	There are existing Framework provisions that quite rightly seek to protect greenspace and sporting functions and perhaps greater emphasis could be given within any suite of National DM Policy to further reinforcement with emphasis on the need for new development to accommodate this further, with additional weight to be given to any form of development that unlocks otherwise under utilised land for this purpose, making it freely and publicly available, and with clearer direction on ensuring that new developments make for useability of the space for practical recreational purposes as opposed to being acceptable purely for its visual qualities. If provision cannot be made on site developers should present comprehensive justifications and promote alternative settings which are accessible and beneficial to the communities they are creating.
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?	<p>The new framework could support achieving the levelling up missions in the Levelling Up White Paper through a nationally set requirement for skills training. This would specifically support mission no.6 ("By 2030, the number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England,....").</p> <p>NPPF Section 6 Building a strong, competitive economy is lightweight in supporting the levelling up agenda so a national Development Management policy should be produced in relation to skills training. The NPPF should set the policy "hook"</p>

	Question	WLBC Response
		<p>for this. Such an approach would negate the need for individual local authorities, in particular those outside the prosperous South-East, having to defend the inclusion of a skills training policy in local plans at Examination and in the subsequent inclusion of a condition attached to relevant planning permissions requiring such training.</p> <p>A policy would cover the following matters:</p> <ol style="list-style-type: none"> 1. The need for planning applications above floorspace (in the case of commercial) and units (in the case of residential) defined thresholds to be accompanied by Employment and Skills / Training Statements. 2. Statements to cover requirements to contribute towards new employment, skills training and the provision of apprenticeships for local residents, for example: <ul style="list-style-type: none"> • Recruitment through local employment vehicles such as Jobcentre; • Vocational training (NVQ); • Work experience (14-16 years, 16-19 years and 19+ years); • Links with schools, colleges and university; • Use of local suppliers[and • Community based projects.
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?	Recognition of the different physical and socio-economic conditions of different parts of the country and the need for tailored approaches to policy
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?	Calls to develop brownfield land ahead of greenfield land is a key response received during Local Plan consultation and LPA's are greatly criticised when they appear not to prioritise brownfield land development. This is often unfair as brownfield land is a finite resource and such land often has multiple constraints not least viability issues. Putting more emphasis on developing brownfield and increasing density is a worthy aim but there should be recognition that this isn't always the most sustainable approach and raises unrealistic expectations with the public. The Government should provide additional funding or clear guidance on how this can be overcome - but with the recognition that brownfield land is a finite resource. There should also be recognition that brownfield sites may have a high level of biodiversity, especially if they have been allowed to regenerate undisturbed with habitat and vegetation over time. Increasing density could also lead to loss of biodiversity. Squeezing more development out of urban areas in order to avoid development of Green Belt, which does not necessarily have much biodiversity, environmental or landscape value should not be seen as the answer. As no LPA has a uniform density or character, will there need to be a lot of resource put into character assessments etc. e.g. through Design Codes? Government will need to provide far greater resources if LPA's are expected to do this.

	Question	WLBC Response
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 in principle but need to ensure that planning can effectively influence this; it cannot be tackled in isolation or seen as solely a planning issue
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?	Need additional resource to help LPA's align with digital reforms and ensure consistency between authorities e.g. with GIS resources
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.	No particular comments but care will need to be taken to ensure that the new measures do not favour certain parts of the community which may have more influence and discriminate against harder to reach groups who do not always have their voices heard during consultation or Examinations.