



## **Submission from South East Councils**

Department for Levelling Up, Housing & Communities (DLUHC) consultation:

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

“Local Plans are an essential part of local democracy, serving as a living vision and guide for place progress in the eyes of local communities.

This submission reflects the often overlooked and incredible expertise and innovation already being achieved by Local Planning Authorities.

SEC members broadly agree with the principles of speedier plan-making, the importance of engaging local communities, and can appreciate the value in technological progress and digitalisation.

However, given the language used around proposed reforms to plan-making, many of our members hold a healthy level of scepticism that proposals in theory will actually deliver in practice.

It is critical that reform genuinely improves plan-making and to do so requires an accurate understanding of why plan-making can take longer than may be desired.

It must be appreciated that many of the factors that delay Local Plans are outside of the control of Local Planning Authorities – including repeated delays and changes at the ministerial level.

Funding must match ambition to ensure capacity both at the level of the Planning Inspectorate as well as local authorities.

Nevertheless, there remains significant room for improvement on all sides as is evidenced by the wealth of proposals and insights from members of South East Councils in our submission.”

**Cllr Nick Adams-King,  
Chair, South East Councils**

**18<sup>th</sup> October 2023**



## 1.0 Introduction

- 1.1 [South East Councils \(SEC\)](#) is a cross-party, membership association that works to ensure that the South East is a great place to live, work and do business. SEC promotes the views and interests of all tiers of local government across the South East and is recognised as an affiliate of the Local Government Association (LGA). With the majority of the seventy local authorities across the region as members, we seek to provide a unified democratic voice on South East interests.
- 1.2 Our [“Towards a Greater South East” \(TAGSE\) agenda](#) has five priorities: (1) efficient Transport to keep our region moving; (2) Affordable, decent Housing to grow sustainably; (3); Collaboration for a Smarter and Greener future; (4) Adequate Skills provision to compete successfully; and (5) Practical Devolution to empower our region.
- 1.3 SEC serves as the Secretariat for the [All-Party Parliamentary Group \(APPG\) for the South East](#), chaired by Sally-Ann Hart MP. Over the last year, the work of the APPG has focused on what levelling up should look like in the South East. The APPG published a report of its inquiry: [Financing the future – what does levelling up mean for South East England?](#) The APPG is currently running a second inquiry: [The South East and ‘Global Britain’: what role for transport infrastructure in underpinning Britain’s plan to trade and grow?](#)
- 1.4 Twice a year, SEC publishes the [South East 1,000](#) a biannual regional monitor. SEC partners with polling agency Savanta ComRes to produce a unique monitor of public, business and civic cohorts. It is the largest regular survey of councillor, business, and public opinion in the region. The [latest edition](#) was published in late 2022.
- 1.5 In March 2022, [“Resetting the South East – Levelling up after Brexit, Climate Change and COVID”](#), a SEC-commissioned report was published by think-tank Localis. It investigated the role of the South East in Levelling Up and what is necessary for its constituent local authorities to deliver – individually and collectively – on this multi-layered and ambitious set of environmental, economic, and social transformations.
- 1.6 In October 2022, SEC hosted [“Tomorrow’s South East” - Summit of the South East \(SOTSE\)](#), a conference in Westminster with *The MJ* as official media partner. The then Local Government Minister Paul Scully MP joined civic and business leaders to discuss levelling up, shared challenges and pressures and planning for growth.
- 1.7 The [Wider South East Dialogue](#) enables leaders of South East local authorities to connect with the Greater London Authority (GLA), London Councils, and the East of England Local Government Association (EELGA) to discuss matters of mutual interest and concern. In 2022, we co-hosted the [London and Wider South East Conference](#).
- 1.8 **SEC welcomes the opportunity to respond to the consultation on reforms to plan-making. We acknowledge that this consultation seeks views on Government proposals to make local plans (and minerals and waste plans) simpler, faster to prepare, and more accessible.**



## 2.0 Executive Summary

- 2.1 SEC members **broadly agree with the principle of speeding up plan-making, increasing engagement with local communities, and ensuring that plans suit local need.** Members have informed SEC that they have already implemented many of the aspects referred to in reforms in their local plans reflecting a forward-looking vision for their areas.
- 2.2 There are **opportunities to improve** upon existing proposals such as the addressing the omission of climate change, health and wellbeing principles from the core principles for plan content.
- 2.3 However, many members have emphasised the long road ahead in terms of work to **ensure that reforms do not add further complexity** to the plan-making process in practice.
- 2.4 **Strong concerns were voiced over how the National Development Management Policies will interact with Local Development Management Policies** – with members asserting that local democracy and decision-making is sacrosanct. **National policy must respect the needs of local communities** – which are better understood by local councillors rather than central government officials – hence why local government is led by democratically elected leaders chosen by local communities.
- 2.5 A repeated theme in the feedback from our members is that reforms are agreeable in principle but **underestimate the practical realities on the ground** as to why the local plan process can be incredibly time consuming.
- 2.6 Several times it was emphasised to us that councils feel factors outside of their control, such as changes in ministerial attitude as well as **consistently shifting priorities** for planning reform writ large are adding complexity to plan-making and slowing down the process.
- 2.7 Simplification such as the introduction of templates is, for the most part, welcomed. However, members felt that there is **value in the uniqueness of local areas** and local innovation should be encouraged, rather than dictated from the centre.
- 2.8 Steps to introduce digitalisation is also generally supported. However, ensuring that traditional methods remain available when engaging communities and ensuring that those who are **less digitally able** are able to comfortably continue to engage in the planning process is seen as important amongst our members.
- 2.9 An **elephant in the room** that continues to go unaddressed in the discussion from Government of these reforms is **the need for adequate funding to Local Planning Authorities (LPAs) as well as the Planning Inspectorate.**
- 2.10 Furthermore, proposed reforms have heightened fears that **costs could increase even further** if services which are currently free become chargeable, in an attempt to speed up plan-making, despite no new funding for our members to pay them.



- 2.10.1 Some of our members have expressed a **strong sense of disappointment** that the Government is intending to proceed with the transitional arrangements whereby plan makers will have until 30 June 2025 to submit their local plans. At this earlier point it was expected that the National Planning Policy Framework (NPPF) would be published by Spring 2023. Delays in the NPPF has meant further delays in the publication of local plans.
- 2.10.2 Yet again **delays outside the control of LPAs have slowed plan-making**, yet LPAs remain in the spotlight. We have been told that a number of LPAs are publicly seeking to pause on the basis of such uncertainty. One option is for the Government to **extend the submission deadline for local plans from 30 June 2025 to 31 December 2025**, and even potentially introduce some flexibility to have Local Plans adopted later, as many delays at examination are beyond the control of LPAs.
- 2.10.3 In summary, it is clear from this submission that there is a wealth of expertise and innovations to admire in the plan-making led by councils across the South East. Proposed reforms are admirable in their ambitions but must be met with the **hard realities of the need for funding – and the need to address factors beyond the control of LPAs** if Government wants to genuinely achieve its ambitions of faster and more inclusive plan-making.



### 3.0 Chapter 1: Plan Content

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

3.1.1 Our members generally recognise and support the core principles of plan content. Many, including some Kent and Hampshire districts we spoke to feel they have already embraced similar principles in their plans, reflecting a forward-looking vision for their areas. The emphasis on simplicity and clarity is particularly resonant, especially given the often lengthy and convoluted nature of current Local Plans.

3.1.2 However, there is concern from multiple councils about the omission of climate change in the core principles, underscoring its centrality in contemporary plan-making. Additionally, there is a call from some quarters, such as a Surrey district, to ensure that while striving for brevity, the depth and nuance of policy details should not be compromised. The multifaceted nature of planning mandates that plans remain comprehensive, rather than being diluted for the sake of simplicity.

3.1.3 Suggestions for enhancements also emerged. The idea of incorporating health and well-being principles was raised, while the need for a clear stance on addressing climate change challenges was reiterated.

3.1.4 In summary, while the move towards streamlined plan content garners support, our members have emphasised the importance of holistic principles, which account for critical contemporary issues like climate change, without sacrificing the intricacy necessary for creating and implementing effective plans.

#### 3.2 **QUESTION 2. Do you agree that plans should contain a vision, and with our proposed principles for preparing the vision? Do you think there are other principles that could be included?**

3.2.1 The consensus among our members tends to be that a vision is important for Local Plans, grounding them with clear aims and priorities. The introduction of evidence-backed guidelines for shaping visions is welcomed by many, as they believe this would lend more credibility and measurability to the vision. A handful of districts told us that they anticipate the introduction of a user-tested digital template for plan-making with interest, believing they could aid in formulating more effective visions.

3.2.2 Points of contention arise in discussing how much weight should be given to the vision. While many support the vision's significance, a Surrey District, for example, highlighted concerns about the heightened emphasis the Government intends to place on it. They emphasise that a vision, while essential, should be considered a "snapshot". It was said that there is value expected in the simplicity of a clear message, but they are unlikely to be able to convey the full extent and detail of what Local Plans will deliver. This could risk misleading residents if the outcomes do not align with their high-level expectations.

3.2.3 There's collective appreciation for the use of a key diagram supporting the vision, as it provides a visual aid enhancing the comprehensibility of the Local Plan.



3.2.4 While our members back the incorporation of clear, evidence-backed visions in Local Plans, they also underscore the importance of ensuring that these visions remain pragmatic and factor in consideration of local expectations and communications.

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

3.3.1 Many of our members have welcomed NDMPs at least in principle, or stated they are not opposed to them; however, this is on the basis that they should not duplicate or supersede local development management policies, which rely on local evidence with a far closer understanding of local communities. NDMPs must account for local need and democracy.

3.3.2 A common thread of feedback is the level of detail on proposed NDMPs is far too sparse for council leaderships to form a comprehensive opinion on the new framework. Councillors feel they have been asked to provide feedback on what looks like a top line, early-stage plan that is expected to change significantly.

3.3.3 Queries have arisen about the dynamics between NDMPs and local development management policies. For instance, a Kent District expressed concern with the implications for local development management policies, perhaps becoming obsolete, if NDMPs are frequently changed and updated.

3.3.4 While the move towards a streamlined national and local development management policy framework is acknowledged, members seek greater clarity, depth, and assurances that NDMPs will not undermine local decision-making to make well-informed judgements.

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

3.4.1 Members shared different views on whether templates would make it easier for local planning authorities (LPAs). It was generally emphasised that while templates could provide a streamlined process for generating plans, the individuality and uniqueness of each local area is paramount as not all components of a plan might align seamlessly with a uniform template.

3.4.2 A few members said they supported the idea of templates to help make the planning process quicker. Another suggested that a “national template” could be developed for specifics such as site allocations policies/development guidance, or for monitoring policies.

3.4.3 Other members challenged the suggested use of templates, arguing that that such an approach may appear to dictate to councils how they should operate in their area, instead of encouraging local innovation. We were warned that templates could reduce the scope for local distinctiveness. It was said that it is unlikely that templates produced at the national level would be capable of reflecting the wealth



of detailed and local matters and LPAs would then have to spend additional time justifying deviations from this approach.

## **4.0 Chapter 2: The new 30-month plan timeframe**

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

- 4.1.1 A small number of members praised the ambition, in principle, to speed up plan-making. However, all Members we spoke to either strongly disagreed with the proposal on 30-months or said that they would only agree if conditions were met, as currently, it is felt that the realities of plan-making have not been given due consideration. For example, examinations are proposed to take 6 months, but currently are never concluded in less than a year, and many take far longer.
- 4.1.2 For the 30-month target to be met at the local level, it should be understood that continuity in government stances, political shifts at local levels, staffing levels, and the provision of adequate resources, among many other factors, would impact the feasibility of this timeline.
- 4.1.3 Some members, including an East Sussex member, were unequivocal: they deem the 30-month timeline utterly unattainable, especially considering the extensive public consultations required. They believe that the Government's expectation places local authorities in a challenging position, potentially leading to rushed plans that may not meet community needs. Meanwhile, they say, developers will still be able to use the NPPF to develop outside of planning boundaries, whilst courts could challenge local authorities who do not meet the 30-month requirement, in some cases perhaps arguably through no fault of their own.
- 4.1.4 We heard that some council leaderships are puzzled about how the proposed guidelines would play out in reality. It was emphasised that central government, unfamiliar with local intricacies, might not be best positioned to dictate such timelines. A Hampshire member expressed concerned that the proposed timeline would strain resources and undermine comprehensive community involvement. The rush could potentially lead to hasty decisions, sidelining evidence-based policymaking.
- 4.1.5 Another perspective from Kent acknowledges the existing prolonged timelines but finds the drastic reduction to 30 months hard to fathom. They questioned if the Planning Inspectorate has adequate resources to handle the proposed changes. Whilst a Hampshire member pointed to logistical challenges in analysing vast volumes of public feedback in such a time period, especially given the lack of a standardised digital engagement platform.
- 4.1.6 While some councils appreciate the intention behind the proposed 30-month timeline, many express concerns about its feasibility and potential unintended consequences that would lower the quality of local plans. The balance between speed and thoroughness is important.





- 4.2 **QUESTION 7. Do you agree that a Project Initiation Document will help define the scope of the plan and be a useful tool throughout the plan making process?**
- 4.2.1 Several member councils told us they perceive the Project Initiation Document (PID) as a positive enhancement to the current system. A Kent District emphasised that it would help to standardise local planning and improve project management. Another member concurred whilst highlighting the importance of timely preparations before the commencement of the project in question. One District told us they already use a PID process for most projects including their local plan so are already familiar with the concept.
- 4.2.2 However, reservations were also raised by SEC members. A Surrey District challenged the practical benefits of the PID, suggesting it could be an additional, possibly superfluous, step. Their concerns stem from the belief that uninformed external parties may not grasp local nuances and needs, potentially complicating the planning process. Instead of attempting to dictate to councils on the practicalities of administration, they advocated the importance of clear, impactful national planning policies as a steer, not an intervention.
- 4.2.3 One District flagged that PIDs could potentially delay the commencement of work on local plans if they take longer than envisaged to put together. Another member council added their view that the initial scoping stage combines plan-scoping with project management which are likely to require more time to be effective.
- 4.2.4 While the PID proposal resonates positively with some councils, seeing it as aligning with modern project management principles, others remain sceptical, emphasising the necessity for clearer guidelines, and ensuring local intricacies and dynamics are not overshadowed.

## **5.0 Chapter 3: Digital Plans**

- 5.1 **QUESTION 8. What information produced during plan-making do you think would most benefit from data standardisation, and/or being openly published?**
- 5.1.1 Members expressed an interest in the standardisation of site information and its availability with an opportunity to standardise data for Land Availability Assessments; Green Belt Assessments; Strategic Flood Risk Assessments (SFRA) – Level 1; site information and availability such as the call for sites process or SHELAA site assessments.
- 5.1.2 Members noted the potential in universally applying data found within evidence base documents. For instance, open space studies, which encompass population data, service provisions, and standards, can be universally applied or reflected within other documents. Raw data from retail household and business surveys emerges as a valuable resource, hinting at its utility for a range of agencies. They emphasised the value in open-source data, such as on population, housing affordability, and employment, which could be leveraged during plan preparations.





5.1.3 Members spoke of challenges such as concern with the variety of software options utilised for major public consultations. A more standardised approach to collecting, collating, and reporting responses during such exercises is seen as beneficial. Another challenge a Hampshire member raised was the overwhelming magnitude of available data. This deluge of information, which often needs external consultants for interpretation, presents complexities for both the public and planners. A plea for simplifying this vast data pool via standardisation resonates in their view.

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

5.2.1 There is a recognition amongst members about the challenges in paragraph 71 that are ubiquitous in Local Plan preparation. Yet, there is an undercurrent of scepticism – an uncertainty on whether digitisation alone can surmount these challenges or if it is a small part of a broader required solution.

5.2.2 One member envisaged digital interventions being seamlessly introduced and standardised at a national tier and another supported the idea that digitalisation could assist in removing impediments to plan-making.

5.2.3 On the suggested lack of clear communicable timelines and updates preventing users from understanding and getting involved, one member council pointed out that several factors influence this beyond the control of councils, such as policy shifts and PINs delays. They add that digitalisation could add potentially superfluous layers of administration. The contention that static, PDF-based plans become obsolete swiftly was challenged, asserting that format does not dictate the frequency of updates.

5.2.4 We also heard that digital solutions should not be pedestalled as the ultimate fix for expediting plan-making. A member highlighted the constraints and cost implications of embracing tech-driven consultation platforms, emphasising the recurrent fees even post-implementation. Importantly, they emphasise that while many might find digital platforms appealing, a considerable segment of consultees might still lean towards traditional communication formats or find digital modes inaccessible.

5.2.5 While there is a consensus that digitalisation offers promising solutions to some challenges, it is imperative to navigate its adoption discerningly, factoring in its inherent limitations and the diverse preferences of the stakeholders involved.

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

5.3.1 Across the responses, there is a clear consensus on the potential benefits of digital innovations in plan-making, but with certain caveats.



- 5.3.2 Kent Districts emphasised to us the importance of collaboration, particularly the Planning Inspectorate's involvement in ensuring the success of digital transitions.
- 5.3.3 Another District mentioned that they are actively adopting technologies including 3D modelling to help better visualise plan proposals, and the use of AI to review consultation responses.
- 5.3.4 A caveat raised by a Surrey district was that though useful, digitalisation must be genuinely deliverable and must not add unnecessary burden and delay on council and must be user friendly to all wishing to involve themselves in the plan-making process.
- 5.3.5 A Hampshire member was adamant about the irreplaceable value of face-to-face community engagement. Digitalisation measures must not sideline in-person interactions where valuable.
- 5.3.6 Our members tend to have a positive stance on digital innovation, provided it complements and does not overshadow traditional practices. The key is a balanced approach that incorporates technology without compromising the essence and inclusivity of local planning.
- 5.4 **QUESTION 11. What innovations or changes would you like to see prioritised to deliver efficiencies in how plans are prepared and used, both now and in the future?**
- 5.4.1 A Kent District emphasises the need for stability in national planning reforms. They argued that constant changes to the national framework, particularly those made rapidly online, disrupt local planning. A possible solution could be setting broader transitional arrangements or letting plans that have reached specific milestones proceed without abrupt shifts. This stability can streamline the process and conserve resources.
- 5.4.2 Embracing Technological Advancements was raised by a Kent district: innovations like 3D mapping for visualisation, AI for processing, and platforms for sharing best practices. These tools could significantly increase the efficiency of the planning process.
- 5.4.3 A Hampshire member raised a significant concern about the financial implications of adopting digital innovations. The costs related to licenses, subscriptions, and renewals can strain LPAs, especially during economic downturns. They recommend that the financial burden be acknowledged, with supportive funding from the central government as a possible solution.
- 5.4.4 Multiple Surrey members indicated a preference for efficient innovations. However, scepticism remains about whether the current proposals would achieve their desired efficiencies. One emphasised that open-source consultation platforms and AI-driven comment processing could add value in expediting local plan preparations.



5.4.5 The overarching desire is for a stable, technologically advanced, financially sustainable, and efficient planning process. A balance between continuous reform and the practical implications of those reforms on LPAs is crucial.

## 6.0 Chapter 4: The local plan timetable

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

6.1.1 Multiple members told us that they agree on the importance of maintaining a transparent timetable. However, they feel that revising every six months might be excessive and suggest an annual revision instead. A Hampshire District supported the six-month update but emphasises the need for clear guidance on governance and delegation. Another appreciated the proposal for reviews every six months or after reaching a significant milestone.

6.1.2 One member highlighted the pivotal role of Gateway meetings in adhering to the 30-month timetable. These meetings can offer essential guidance to planners before reaching the examination phase. However, the effectiveness of this approach depends on the Planning Inspectorate being well-equipped with resources and adequately trained inspectors.

6.1.3 A Surrey member questioned the real value of renaming the LDS to the 'local plan timetable'. They feel that beyond renaming and introducing minor elements, it is unclear how these changes will significantly alter the plan-making process. While the Council welcomes certain clarity aspects, they emphasise that it should be up to individual authorities to determine what is best for them.

6.1.4 One member expressed scepticism about the feasibility of the 30-month timetable but agreed that the proposed milestones for reporting appear logical. They appreciate a more streamlined requirement to the LDS in a standardised digital format.

6.1.5 In summary, while there is a general agreement on the need for transparency and consistency in reporting, there are multiple opinions on the frequency of timetable updates.

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

6.2.1 A Kent District suggested that the three Gateway milestones should automatically instigate a review of the timetable, considering the potential need for additional tasks following these stages.

6.2.2 Several respondents from across the region emphasised that alterations to national policy, such as the NPPF, should warrant a review. One District explained



how changes to the NPPF have consistently delayed the plan-making process, resulting in instability. Shifts in political direction, possibly due to elections, might necessitate a timetable review. Members added that continuous disruption and changes from the Ministerial level is incredibly unhelpful and an active hinderance to the plan-making process.

- 6.2.3 There is also an acknowledgment amongst our members that certain local situations, possibly unique to a particular region or time, could demand a review. This might encompass instances where feedback from consultations requires gathering more information or if unforeseen hitches in developing an evidence base, like a transport assessment, arise.

## 7.0 Chapter 5: Evidence and the tests of soundness

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

- 7.1.1 While the proposed direction for national policy and guidance seems to provide more clarity about expected evidence, there are concerns. These range from the need for a clearer definition of 'proportionate evidence', desires for a more locally contextualised standard of evidence, and reservations about removing certain tests from the process.

- 7.1.2 A Kent District emphasised the need for a clearer understanding of 'proportionate evidence'. They highlight past challenges, such as Inspectors requesting additional evidence during examinations, leading to resource and time consumption.

- 7.1.3 Another member acknowledged the utility of a standardised evidence list but raised concerns about the need for specialised evidence in certain contexts, like landscape or heritage. They also criticise the housing need calculation method, emphasising the need for more local context in its design.

- 7.1.4 There is worry about the proposed changes to the tests of soundness and the removal of the justification requirement. Irrespective of an evidence base's proportionality, justification is seen as essential for both plans and policies.

- 7.1.5 One District said they see value in demystifying the evidence needs, pointing out that sometimes more effort goes into the evidence base than the plan. They suggest categorising evidence into what is essential and what is additional.

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

- 7.2.1 There is a consensus among some of our members for the standardisation of evidence requirements, with specific topics recurring across responses, such as



development needs, sustainability appraisals, land availability assessments, and strategic flood risk assessments. The members see the benefits in terms of consistency, timesaving, cost-efficiency, and resistance to challenges.

7.2.2 Specific Topics for Standardisation suggested by our members include adding Sustainability Appraisals and Strategic Environmental Assessments; standardisation in areas like development needs, settlement hierarchy, site assessments, impact assessments, sustainability appraisal processes, habitat regulation assessments, net-zero carbon requirements, strategic flood risk assessments, and potentially Green Belt assessments.

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

7.3.1 There's broad agreement among members we spoke to regarding the value of freezing data at certain stages. This consensus stems from a desire for consistency, efficiency, and clarity throughout the planning process. However, there is some variance in the exact stage at which data should be frozen, with some advocating for earlier freezes to ensure stability in plan formation, while others see value in freezing data later in the process or depending on the specific type of evidence.

7.3.2 A Kent district saw merit in all three proposals but leans more towards freezing input data and agreeing on the scope of the evidence. Another Kent member said they believe that freezing data would assist in offering a proportionate response and accelerating the plan-making process. They think it should be applied to both data input and the scope of evidence. Whilst one other member suggested freezing input data at a certain point to avoid frequent reviews when new data becomes available.

7.3.3 A Surrey District emphasised the importance of freezing data due to the time it takes to develop a plan and the changing nature of various datasets. They argue against freezing only at the publication point, recommending instead that the freeze should occur following the first public consultation. They believe this approach ensures consistency throughout the plan development. Challenges to the data should be limited to the appointed Planning Inspector based on merit.

7.3.4 A Hampshire district supports freezing, pointing out that sometimes data labelled "outdated" still remains relevant, making updates expensive and redundant. They highlighted that development needs change frequently, causing fluctuation and uncertainty in plan-making. They advocate for freezing development needs data early in the process for clarity.

7.4 **QUESTION 17. Do you support this proposal to require planning authorities to submit only supporting documents that are related to the soundness of the plan?**



- 7.4.1 While a majority of members we spoke to express support for the proposal to focus on documents related to plan soundness, there is an overarching theme stressing the importance of transparency and the need for clearer guidelines. One district offered a counterpoint, emphasising the inherent value of all prepared evidence and highlighting potential ambiguities and community engagement concerns.
- 7.4.2 One member said that only documents pertinent to soundness should be submitted. However, they emphasise the need for transparency by suggesting all supporting evidence used in plan production be published and accessible. Another supports the proposal but calls for more explicit guidance on the necessary evidence supporting the examination of a Local Plan.
- 7.4.3 Another had reservations, pointing out that this proposal might necessitate judgment calls by LPAs on which documents to submit. They fear authorities may overcompensate and submit excessive documents, undermining the proposal's intent. They suggest the possibility of additional guidance or dialogue during the “gateway” assessment.
- 7.4.4 On the other hand, one member was opposed. They expressed uncertainty about the proposal's implications and see it as a matter of semantics without significant reformative value. They argue that if evidence were crafted to inform the plan, it would inherently support its content and soundness. They also raised concerns about potential impacts on community engagement, transparency, and involvement.

## **8.0 Chapter 6: Gateway assessments during plan-making**

- 8.1 **QUESTION 18. Do you agree that these should be the overarching purposes of gateway assessments? Are there other purposes we should consider alongside those set out above?**
- 8.1.1 While most members express some degree of support for the gateway assessments and their purposes, there are differing opinions on their implementation, potential challenges, and efficacy. One was explicitly against the idea, highlighting the inherent challenges and complexities of Local Plans. The feedback indicates a need for flexibility, clear guidance, and careful consideration of logistical and financial challenges.
- 8.1.2 In support, one Kent district agreed but emphasised flexibility by suggesting the possibility of adding an additional Gateway if significant changes, like a change in Local Government administration, occur.
- 8.1.3 Another member expressed support for the gateway assessment process and its purposes but raised concerns about time constraints and potential logistical challenges. They also mentioned that the costs borne by LPA would require budget adjustments.
- 8.1.4 However, one member stated that they are not in agreement. They questioned the necessity and accuracy of introducing gateway assessments. They believe Local





Plans need to maintain a balance and it is unrealistic to expect every Local Plan to be perfect from the start. They doubted what gateways can truly achieve in this context.

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

8.2.1 While there is some support for the proposed gateway system, several districts have voiced concerns about its implementation. These concerns range from the duration of the gateway process to the expertise of the involved parties. The feedback indicates that while gateways might introduce some structure and checks, their potential impact on resources, time, and the overall plan-making process needs careful consideration.

8.2.2 One member supports the introduction of the gateways but suggests they not be too process driven. They propose that a planning inspector should oversee all three gateways to ensure continuity.

8.2.3 One member outright rejected the gateway assessment process. They question the expertise and experience of a “gatekeeper” organization, stressing that without proper insight into local authority operations, it might lead to delays and wasted resources.

8.2.4 Another emphasised the need for consistency in the gateway assessments but expressed concern with the resource allocation and timeline. They questioned the exclusion of certain parties, like the council's legal team, from meetings, especially if these discussions are critical to the plan-making process. They also raised concerns about the duration of the gateway processes, noting it could take up a significant portion of the proposed 30-month timeline.

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

8.3.1 Responses towards the gateway assessment process amongst our members vary. While some are in favour, others have expressed significant concerns about the proposal, particularly regarding its potential prescriptiveness and the implications of the third gateway's “binding” nature. If implemented, a careful balance and further clarification might be necessary to address these concerns.

8.3.2 A number of our members simply stated they agree with the proposal without further elaboration.

8.3.3 One Kent member highlighted a potential distinction between tasks that relate to project management processes and those tied to the content of the plan. They expressed that clarity on the outcomes or recommendations for both types of tasks would be useful. Additionally, they touched on the need for additional resources from within the LPAs to support the gateway process.





8.3.4 On the other hand, other members rejected the gateway assessment process. Their main concern centres around the third gateway's potential "binding" powers. The council questions how this might conflict with local decision-making processes and seeks clarity on how the third gateway's binding nature may force a plan into submission against a council's wishes. They also query the need for changes to primary legislation regarding local authorities' decision-making powers.

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

8.4.1 While our members acknowledge the potential value of gateway assessments, many are concerned about the associated costs. Given the current financial landscape of many LPAs, any added financial burden is a point of contention. If implemented, transparent communication about potential fees and consideration of the economic context will be vital.

8.4.2 One member raised concerns about the potential significant cost burden if the fee is similar to the standard rate for a Planning Inspector. Another added that existing advisory visits by PINS are free of charge. They query the level of funding required if planning authorities are to be charged.

8.4.3 A Kent member argued that the gateway process will necessitate additional resourcing from LPAs. This could strain their budgets and affect their ability to achieve core tasks. They disagree with the proposal to charge for this service, but if it is decided to charge, it should be proportionate.

8.4.4 Another member strongly opposes the charges, mentioning that policy should not be used to force a Council into paying for a process they haven't requested. They bring up the significant expense of the Planning Inspectorate and how inspector fees often comprise a large chunk of plan-making budgets.

9.0 **Chapter 7: Plan examination**

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

9.1.1 The proposal is supported in principle by many members, but there are reservations, such as about the ambitious six-month timeframe for examinations and sufficient funding for the Planning Inspectorate. Logistics such as venue hire, availability of legal personnel, consultants, and inspectors should be considered upfront to prevent potential delays, we were told by one member.

9.1.2 The need for a swift examination process is acknowledged, but it will hinge on sufficient resourcing within the planning inspectorate, which was emphasised by several members. We heard that there is an opportunity to streamline the examination process by reducing duplications, such as overlapping statements or



representations, and considering a shorter consultation period for main modifications.

9.1.3 One member stated that they support reforms that genuinely expedite plan-making but are sceptical of the government's current proposals. They specifically highlight concerns about the realism of the proposed six-month timeframe for examinations, especially if there's no significant increase in resources for the Planning Inspectorate.

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

9.2.1 The question of whether a six-month pause period during plan examinations is adequate has elicited mixed views from amongst our members. While some believe the timeframe is suitable, concerns arise about its rigidity, especially when faced with unexpected challenges or events. There is some consensus that factors like holiday periods and unforeseen global events should be considered. There is also an argument for lengthening the period to accommodate intricate challenges involving multiple stakeholders.

9.2.2 A Hampshire member expressed support for the six-month timeframe, emphasising the importance of aligning with the 30-month plan production goal.

9.2.3 One Kent member advocated for flexibility in the pause period, especially during holiday seasons. Concerns arise about potential consequences, like plan withdrawals, if the pause period expires due to uncontrollable events. Another believes that the six-month period is too short for addressing complex issues, especially when multiple stakeholders are involved and proposed an extension to a year.

9.2.4 A Surrey member disagreed stating that the reasons for examination pauses can vary and are unique to each authority, making a fixed six-month period neither reasonable nor effective.

## 10.0 **Chapter 8: Community engagement and consultation**

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

10.1.1 Responses to the proposal of detailing engagement approaches in a PID vary amongst our members. While some find value in a centralised documentation of engagement strategies, others expressed concerns about the potential inconsistencies and challenges it might bring. There is a general agreement on the importance of engagement in the planning process, but members differ in how they believe it should be approached and documented.



- 10.1.2 A Kent member welcomed the proposed approach that emphasises digital participation, early involvement, and a standardised consultation methodology. They suggest that the PID should identify specific groups that are harder to reach and describe various communication channels. Yet another stated that the engagement approach might be too comprehensive for a PID. Instead, a separate, detailed Engagement Strategy could be employed, emphasising extensive stakeholder mapping and diverse engagement methods. Alternatively, a Hampshire member stated that they see value in a PID for outlining engagement strategies but are concerned about potential inconsistencies among LPAs. They advocate for a standardised PID format to ensure uniform engagement practices.
- 10.1.3 One Surrey member disagreed with the proposal. They believe the engagement and consultation will not benefit from the proposed changes. They emphasise that the reasons people engage in consultations vary widely, and using response rates as a measure of success might be misleading. Another has argued that national requirements should be flexible and not prescriptive to allow planning authorities to determine suitable consultation methods. They also expressed concerns about the clarity of the PID's examination process and its role in subsequent Gateways.
- 10.2 **QUESTION 25. Do you support our proposal to require planning authorities to notify relevant persons and/or bodies and invite participation, prior to commencement of the 30 month process?**
- 10.2.1 Our members have been generally positive towards early engagement in the planning process. However, some expressed concerns about potential pitfalls or questioned the real-world impact of the proposed early notifications.
- 10.2.2 A Kent member agreed with the need for early engagement, emphasising the importance of involving residents, businesses, statutory bodies, and neighbouring authorities from the onset. Another member, while not opposed, questioned the tangible benefits of the proposal, noting that they already actively engage with relevant entities during the planning process.
- 10.2.3 A Hampshire member added that that early engagement, although well-intentioned, might not necessarily translate to acceptance of development proposals. Rural areas, in particular, see strong opposition to development on countryside sites, regardless of engagement efforts, they said.
- 10.2.4 Another member warned that, while generally supportive of notifying stakeholders early in the process, there is potential for planning authorities to become bogged down in the preliminary stages, leading to delays. Whilst another cautioned that seeking input too early might lead to confusion or frustration among stakeholders, believing that feedback is most constructive when stakeholders can comment on draft policies and approaches.



- 10.3 **QUESTION 26. Should early participation inform the Project Initiation Document? What sorts of approaches might help to facilitate positive early participation in plan-preparation?**
- 10.3.1 The integration of early participation in shaping the Project Initiation Document (PID) elicits varied perspectives amongst our members. While some see the value in infusing the PID with early insights, others challenge its efficacy and question the nature of engagement strategies themselves. Methods of engagement and the depth to which they should influence the PID form the crux of these responses.
- 10.3.2 One member promoted early participation in the PID, noting the efficiency benefits of having a clear consultation roadmap, given the proposed 30-month plan cycle.
- 10.3.3 Another member casted doubts on the PID's inclusion in the Gateway process and highlighted potential challenges in segregating and managing various engagement forms. They would like clarity on the tangible outcomes of these engagement stages.
- 10.4 **QUESTION 27. Do you agree with our proposal to define more clearly what the role and purpose of the two mandatory consultation windows should be?**
- 10.4.1 Our members generally favour a well-defined framework for these windows but highlight nuances in their experiences and concerns that might affect their outcomes. The balance between structure and flexibility, and the alignment between the proposed approach and current practices, are recurrent themes.
- 10.4.2 A Kent member affirmed the importance of clear consultation frameworks. They emphasise the need to ensure the approach provides adequate time and scope for meaningful plan creation and feedback.
- 10.4.3 Another member stated that while in agreement with clear definitions, they stress the need for innovation and flexibility in consultation methods. Their experience suggests that extending consultation periods does not necessarily result in better or more feedback.
- 10.4.4 Concerns were raised about the potential disparities between the two proposed stages. There is a risk that stakeholders might not understand the evolution of plans between these stages.
- 10.5 **QUESTION 28. Do you agree with our proposal to use templates to guide the form in which representations are submitted?**
- 10.5.1 Our members generally recognise the potential benefits in terms of structured feedback and analysis efficiency. One member went so far as to say that if done successfully, templates would assist authorities in speeding up the process for considering representations and could be made available for all stages of formal consultation. However, our members also emphasise the need for accessibility and flexibility to cater to all, ensuring the method does not inadvertently hinder or exclude feedback.



10.5.2 One member called for provisions for those with limited IT access or literacy, ensuring everyone is able to submit feedback comfortably. Another stressed the necessity for templates to be user-friendly and cautioned against the possibility of respondents bypassing the templates in favour of traditional methods, which might complicate the analysis process and potentially breach the 30-month deadline.

## 11.0 Chapter 9: Requirement to assist with certain plan-making

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

11.1.1 The inclusion of National Highways to the list was suggested by one member.

11.1.2 A Surrey member stated that while they believe that the current statutory bodies list is satisfactory, they urge Government to ensure its relevancy and ensure it is kept up to date.

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

11.2.1 Our members seem inclined to support the proposed approach. This consensus is driven by the need for clarity and early engagement from these bodies. However, there are concerns about the timeline of feedback from these entities and potential implications for non-compliance.

11.2.2 A Surrey district stated they support the approach but stress the importance of early contributions, especially from infrastructure and environmental bodies, which can typically be slow to respond and/or cause issues in plan-making and for examination when it comes to agreeing that a plan can be mitigated and any mitigations delivered.

11.2.3 A Hampshire member raised a concern that many prescribed bodies may not be in a position to offer substantial feedback until later stages in the plan-making process, especially when specific development sites are identified.

11.2.4 Another member suggested that the Government should clearly outline the implications for organisations that do not adhere to a “require to assist request”. Without potential penalties, there might be a lack of motivation to provide timely information.

## 12.0 Chapter 10: Monitoring of plans

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

12.1.1 The response amongst members is generally positive. The importance of monitoring to ensure local plans are effective and up-to-date has been



emphasised. However, some members express the need for clarity, consistency, and more detailed specifications in these requirements.

- 12.1.2 One member agreed with the proposed monitoring requirements. They express curiosity regarding the “progress towards net zero emissions from buildings” indicator and have concerns about the 10% BNG potentially being a low benchmark for some LPAs.
- 12.1.3 Another emphasised the significance of monitoring to guarantee that plans are achieving their primary objectives. They appreciate the idea of a simple annual report alongside a comprehensive report for plan updates.
- 12.1.4 It was also said that a consistent monitoring approach could enable precise cross-authority comparisons. With the right data handling systems, frequent data provision should be straightforward, they said. They questioned the necessity of a 'light-touch' yearly method and advocate for standardised data-handling systems on a national level.
- 12.1.5 Other members shared that they find the current monitoring proposals somewhat vague and are unsure if they will be advantageous. While they note that the proposals don't seem to deviate much from current practices, they would welcome a more specific and reduced set of monitoring indicators.
- 12.2 **QUESTION 32. Do you agree with the proposed metrics? Do you think there are any other metrics which planning authorities should be required to report on?**
  - 12.2.1 Overall, our members have mixed views, emphasising the importance of precision, practicality, and capturing a broader picture of development.
  - 12.2.2 A Kent district stated that they are in agreement with the suggested metrics but point out the potential inadequacy of the 10% Biodiversity Net Gain (BNG) target if LPAs have more ambitious targets. They are also keen to view the metric related to the progress toward net zero emissions from buildings.
  - 12.2.3 Another member stated there may be value in potentially expanding the metrics. They propose metrics that capture changes in employment floorspace, especially those resulting from prior approvals, and another related to retail/town centres/class E. Whilst one member advocated for more granular metrics, suggesting capturing details like the number of bedrooms, types of housing units, and changes in floorspace. Metrics for competitions on brownfield land, not just permissions, and metrics for self-build housing were also mentioned.
  - 12.2.4 Concerns were raised by a member about how visions, which are qualitative, would be monitored.

## 13.0 Chapter 11: Supplementary plans





13.1 **QUESTION 33. Do you agree with the suggested factors which could be taken into consideration when assessing whether two or more sites are ‘nearby’ to each other? Are there any other factors that would indicate whether two or more sites are ‘nearby’ to each other?**

13.1.1 One member elaborated on the context and application of Supplementary Plans (SPs), pointing out that such plans are meant for exceptional cases or unforeseen sites. When considering if two sites are “nearby”, the geographical distance and the intrinsic relationship between sites should be considered. They added that if multiple sites surrounding a key point, like a station, are earmarked for regeneration within the main Local Plan, these can be addressed in a joint supplementary plan.

13.1.2 One member indicated they disapprove of removing Supplementary Planning Documents, expressing concerns over potential gaps they might leave behind. They support the use of SPs for Design Codes but are unsure about other possible applications. They expressed concern that the “nearby” criteria might cause inconsistency in the application of SPs.

13.1.3 A Surrey district indicated confusion as a result of the specific focus on the “nearby” criteria, suggesting the main Local Plan should offer enough direction without needing supplementary plans for nearby sites. They believe that with mandatory five-year updates for Local Plans, there should rarely be a need for an SP to guide delivery between updates.

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

13.2.1 Many of our members require further information before stronger views can be formed. One member deemed it premature to provide feedback before the unveiling of regulations in paragraph 191. Another expressed reservations and are seeking clearer guidelines, particularly on how SPs can be readied and implemented ahead of a new Local Plan. Concerns also extend to potential discrepancies between SPs and any new spatial strategies, visions, or policies.

13.2.2 One member suggested a practical approach: adopting a streamlined version of the PID for these supplementary plans. Another advocated for flexibility, highlighting that the Nation Model Design Code – Part 1 already outlines consultation stages for Design Codes. In their view, there's no pressing need for supplementary guidelines. They believe any engagement type should be contingent on the content of supplementary plans, emphasising the role of local discretion over a stringent prescribed approach.

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





13.3.1 There's a shared sentiment among our members regarding the sufficiency of a single formal stage of consultation for supplementary plans. Many see this as aligning with current procedures for Supplementary Planning Documents. The extensive consultation during the preparation of the parent Local Plan is also noted as providing the foundational context for the supplementary plan, reinforcing the idea that a single consultation might be adequate.

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

13.4.1 Across our members, there's a general agreement that setting thresholds or guidance for supplementary plan examination routes would be beneficial. They tend to acknowledge the potential of examination to elongate the adoption process, and thus, there's an inclination towards streamlined processes, like the approach taken for Neighbourhood Plans. The idea of allowing the examiner to make a decision based on issues raised during formal consultation was also floated as a flexible alternative to rigid thresholds by one member. Overall, the feedback emphasises the need for clarity and efficiency, ensuring unnecessary costs and delays are circumvented.

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

13.5.1 The members we spoke to agreed that the proposed approach offers a proportionate basis for the independent examination of supplementary plans or had no comment to make. The continuation of existing Supplementary Planning Documents (SPDs) until the adoption of a new style local plan is also positively viewed. This agreement indicates the perceived effectiveness and fairness of the approach in ensuring proportionality during the examination of supplementary plans.

## 14.0 **Chapter 12: Minerals and waste plans**

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

14.1.1 No comment.

## 15.0 **Chapter 13: Community Land Auctions**

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



15.1.1 Responses on the envisioned Community Land Auctions (CLA) process yields varied perspectives amongst our members. One member abstained from offering a concrete stance noting that it's too early to comment given the impending Levelling Up and Regeneration Bill likely to become an Act and the yet-to-be-finalised proposals for the new Infrastructure Levy.

15.1.2 On the other hand, one member expressed concerns, viewing the CLA process as burdensome and counterproductive, potentially stalling site selection and the broader plan-making procedure. Another mentioned potential inconsistencies with the traditional site selection approach, pondering the mechanics of how sites would be chosen and the implications if a site owner was unwilling to disclose their selling price.

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

15.2.1 Our members tend to express a degree of caution and a need for balanced decision-making. One member emphasised that financial benefits deriving from the CLA approach should not overshadow or undermine sustainability or other site-specific concerns. Another pointed to the current viability assessment process during the plan-making stage as sufficiently catering to strategic planning.

15.2.2 The existing balance of considering social, environmental, and economic factors through sustainability appraisal processes should also be considered. One member expressed apprehension that introducing a financial criterion might skew decisions towards sites offering higher financial uplift rather than those that are more sustainable. Additionally, they sought clarity on how the CLA process would affect local authorities that promote their own land for development, particularly concerning the need to achieve the best value from public land sales.

## **16.0 Chapter 14: Community Land Auctions**

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

16.1.1 Members we spoke to shared concerns about the stipulated timelines and the potential role of the planning inspectorate in transitional arrangements.

16.1.2 A Kent member expressed disappointment that the Government is intending to proceed with the transition arrangements as proposed within the December 2022 consultation, whereby plan makers will have until 30 June 2025 to submit their local plans. At this date it was envisaged that the new NPPF would be published in Spring 2023 and yet this is now not expected until September 2023 at the earliest, they write. They add that the consultation suggested quite considerable reforms to the approach to housing targets and the Green Belt and without this certainty it is difficult for Green Belt authorities to proceed with their plan-making. **The government will be**



aware of the number of LPAs publicly seeking to pause on the basis of this uncertainty.

- 16.1.3 One member advocated for the transitional arrangements set out in paragraph 235 should be extended to avoid a mass pausing of plan making, to prevent potential disruptions in plan-making among LPAs.
- 16.1.4 Another cited challenges due to the delayed publication of the new NPPF, urging reconsideration of the imposed timeframes. **Pushing the submission deadline for local plans from 30 June 2025 to 31 December 2025, was proposed,** emphasising the unpredictability of delays during examinations. It was added that there should be some flexibility to the need to have Local Plans adopted by 31 December 2026 as many delays at Examination are beyond the control of the LPA.
- 16.1.5 On grouping, one member suggested a sequential grouping based on the latest plan adoption dates, with each group given a specific window for plan-making commencement.
- 16.1.6 Another member spoke of autonomy and flexibility, stressing the need to preserve local authority autonomy and voiced concerns over potential disruptions to local decision-making.
- 16.1.7 The capacity of Planning Inspectorate was also raised with one member mentioning the pivotal role of the planning inspectorate, given the upcoming changes.

## 17.0 Chapter 15: Saving existing plans and planning documents

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

- 17.1.1 Many of the members we spoke to stated that they concur with the proposal to save existing plans and planning documents.
- 17.1.2 One member stated that they agree with the “saving” arrangements but noted that this would only apply to authorities with up-to-date plans.
- 17.1.3 A Surrey member voiced their support for government assistance in warding off unsuitable and speculative developments. While recognising that it is impossible to halt the submission of all such proposals, the council emphasised the need for policies and legislation to be robust enough to provide a clear direction. The council has called for clear delineations of which types of applications this would apply to, ensuring that positive schemes are not hindered.

## 18.0 Equalities impacts

- 18.1 **QUESTION 43. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?. Please**



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

- 18.2 One member told us that the proposals for reform could result in the use of Supplementary Plans (SPs) to deal with matters of Gypsy and Traveller allocations. This could be contrary to that of the Equality Act 2010 and the council recommends that the government clarifies the position on using SPs to allocate land where it may be to address the needs of a specific cultural group.

**FURTHER INFORMATION**

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