

Planning Committee

15 September 2023

Agenda item number 14

Changes to the Planning System for Local Plans- Government Consultation

Report by Planning Policy Officer

Summary

The Government is consulting on how it proposes to introduce the wide-ranging changes to the plan-making system it is bringing forward via the Levelling Up and Regeneration Bill. This report introduces the proposed changes and proposes responses to the consultation questions.

Recommendation

To note the report and endorse the nature of the proposed response.

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1. Introduction

- 1.1. The consultation, entitled [Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms](#) has been published. It outlines further details on the changes to the plan-making system first announced last year via the publication of the Levelling Up and Regeneration Bill (LURB) and its accompanying policy paper.
- 1.2. The Committee's comments, guidance and endorsement are invited.

2. Headlines

- 2.1. The main elements of the proposed new system are as follows:
 - One single Local Plan (plus a Minerals/Waste Plan).
 - Review to start within 5 years of adoption of the last plan.
 - Local Plan 'timetable' to be produced and updated every six months.
 - Scoping a plan via a Project Initiation Document
 - Introducing three external 'gateway assessments' by 'assessors' at scoping/evidence stage, for a legal/procedural check and then a final pre-examination check.
 - Examinations to take no longer than 6 months.
 - Adoption within 30 months.
 - 'Community Land Auctions' to be piloted.
- 2.2. It is proposed for the new system to be in place in Autumn 2024.

3. Chapter 1 - Plan content.

- 3.1. The LURB specifies that plans should set out the local planning authority's policies for the "amount, type and location of, and timetable for, development" in its area. In addition, plans may include other policies and infrastructure requirements.
- 3.2. It states that the required "vision" should "serve as a 'golden thread' through the entire local plan, with policies and allocations linking directly to delivering the outcomes set out in the vision". There will be a set of national Development Management (DM) policies, supplemented by local DM policies, which should be underpinned by appropriate justification. The justification for local DM policies should be scoped out by Local Planning Authorities (LPAs) as well as through the new gateway assessments and should support the vision only.
- 3.3. There will be a series of templates, setting out standardised approaches to specific parts of the plan.

4. Chapter 2 – the new 30-month plan timeframe

4.1. The programme to meet the 30 month is set out below:



4.2. Further details are provided about the various stages, as follows:

Timings	Stage	Detail
4 months' notice	Scoping and early participation. This is the old Regulation 18 stage.	<p>a) Preparation of a Project Initiation Document, using a digital template provided by government, setting out scope, issues, project management, risks, resourcing, approach to engagement.</p> <p>b) Requires LPAs to give four months' notice of their intention to produce a plan.</p> <p>c) Defines the scope of the local plan and identifies evidence required to create a sound plan, including to inform the Strategic Environmental Assessment (and its eventual replacement Environmental Outcomes Reports) also begins in this stage.</p> <p>d) Ends with the submission of evidence for the first gateway.</p>

Timings	Stage	Detail
Month 1	First external gateway assessments -to ensure the plan “sets off in the right direction”.	<p>a) Not necessarily by a Planning Inspector (PINS).</p> <p>b) Advisory. The recommendations are not binding.</p> <p>c) Four weeks maximum duration, six in exceptional circumstances.</p> <p>d) Topics:</p> <ul style="list-style-type: none"> • Review of the Project Initiation Document (see above), including: <ul style="list-style-type: none"> ○ Proposed scope of the plan and identifying the evidence required to create a sound plan; ○ Project management, governance, risks to delivery and resourcing to deliver against the local plan timetable; ○ The overall approach to engagement with communities and stakeholders, including statutory bodies throughout the plan preparation process. • Data and digital approach; • Early scoping of relevant Strategic Environmental Assessment (SEA) and, subsequently, Environmental Outcome Report (EOR) requirements; • Scoping out topics where local specific development management policies may be required; • Headline position on delivering new homes based on the standard method and recent Housing Delivery Test (HDT) results and, where possible, describe the high-level options available to deliver development needs in the area; • Headline positions on how plans will reflect any relevant Local Nature Recovery Strategy (LNRS).
Months 2-7	Plan visioning and strategy development	<p>a) Includes a requirement to establish the vision, aims and objectives of the plan. “...We propose that plans will need to contain a locally distinct vision which will anchor the plan, provide strategic direction for the underpinning policies...” and “(it) should set out measurable outcomes for the plan period, underpinned by the planning authority’s evidence base, which are actively monitored following adoption of the plan.”</p> <p>b) This stage will confirm the evidence required to support this;</p> <p>c) Includes the spatial options and topics to be covered in local policies as part of the plan;</p> <p>d) “Planning authorities should also ensure that a key diagram is created. This should initially represent the spatial strategy, linked to the plan’s vision, and evolve to represent the agreed spatial strategy of the draft plan.”</p> <p>e) “We propose to provide a user-tested digital template which can be used by authorities during plan-making. This will indicate what a vision should do and contain.”</p>

Timings	Stage	Detail
Months 8-9	First Consultation. This is the old Regulation 18 stage	a) Consultation windows will be retained but will be “more clearly defined and strengthened through regulations to increase their impact”. First consultation window of eight weeks duration.
Months 10 – 15	Evidence gathering and drafting the plan	a) Local DM policies should be underpinned by appropriate justification and should, wherever possible, enable delivery of the plan’s vision. b) “We propose to set out in policy an expectation that any templates provided by the government will be used in the preparation of plans”.
Month 16	Second external gateway assessment - ensuring compliance with legal and procedural requirements and (wherever possible) supporting early resolution of potential soundness issues.	a) Advisory; the recommendations are not binding. b) Four weeks duration maximum, six in exceptional circumstances; c) Topics: <ul style="list-style-type: none"> • Progress against Project Initiation Document and programme; • Progress against observations or advice received at Gateway 1; • Topic-specific advice based on planning authority and appointed person identified issues (around emerging plan and evidence); • Data and digital requirements (including policies map); • Progress with relevant SEA (and subsequently EOR) requirements; • Engagement with communities and statutory bodies; • Compliance with the requirement to have regard to certain matters, including any relevant Neighbourhood Priorities Statements.
Months 17-18.5	Proposing changes This is the old Regulation 19 stage.	a) Following the second gateway assessment, planning authorities should seek final Member sign-off of the local plan for public consultation.
Months 18.5-20	Second Consultation.	a) Six weeks duration
Month 21	Third external gateway assessment - to monitor and track progress.	a) Binding – Inspector can call a halt. b) Four weeks duration maximum, six in exceptional circumstances. c) Topics d) Assess whether procedural and legal requirements met; e) Regard had to observations and advice at Gateways 1 and 2; <ul style="list-style-type: none"> • Evidence prepared as proposed and any previously identified gaps addressed; • Relevant SEA (and subsequently EOR) published, including explanation of compliance with national requirements;

Timings	Stage	Detail
		<ul style="list-style-type: none"> • Summary of representations available; • Digital and data requirements met (including policies map); • Nationally defined templates used, where appropriate; • Engagement activities undertaken in line with Project Initiation Document with regard to national guidance; • SDS general conformity statement prepared (where relevant); • Practical readiness for examination (e.g. venue identified for hearings etc.).
Month 22	Submission This is the old Regulation 22 stage.	
Months 23 - 28	Examination This is the old Regulation 24 stage.	<p>a) Proposes to set out in regulations that the pause period may not be longer than 6 months – if not the Inspector will recommend withdrawal. 9 months if consultation on modifications is needed.</p> <p>b) Using panels of two or more inspectors “by default” to increase efficiency and “revising the way the Matters, Issues and Questions (MIQs) stage of the process works, so that only the relevant planning authority is invited to submit responses”.</p>
Months 29-30	Finalisation/Adoption This is the old regulation 26 stage	
Post Adoption	Monitoring and updates	<p>a) A proposed detailed monitoring return, which planning authorities would be expected to complete within four years of the plan being adopted, would ensure that updates to plans can be more targeted and focused.</p> <p>b) Review to start within 5 years of adoption of the last plan.</p>

5. Chapter 3 – Digital plans

- 5.1. The LURB includes provisions to ensure that data is consistently processed, and planning authorities no longer receive data in inconsistent formats, and is open, enabling users to freely reuse it.
- 5.2. The consultation is asking for examples of Best Practice to be submitted. This covers all aspects of plan making and planning and could include examples of visualisation of plans, policies and spatial data and useful templates, checklists and step-by-step guides. There is an emphasis on the standardisation of data for consistency, access and use and the use of dashboards and platforms for transparency and communication, as well as search tools to better access information. Automation tools and AI are also identified as having many potential applications.

6. Chapter 4 – The local plan timetable

- 6.1. Currently, the timetable for a local plan is set out in a Local Development Scheme (LDS). The consultation proposes that this is replaced by a local plan timetable that sets out commencement of the 3 gateways, the 2 consultation windows, the examination and adoption.
- 6.2. The timetable must be written in plain English and published on a website in a tabular form and as a dataset. There would be a requirement to review it every 6 months.

7. Chapter 5 – Evidence and the tests of soundness

- 7.1. The consultation states that there will be clear guidance in national policy on what evidence is required to support a local plan, with differentiation between information or evidence required to meet the legal and soundness tests, and that which is required to inform policy making. The guidance will also set out requirements around proportionality.
- 7.2. To assist in the above, templates will be provided, including statements of compliance with legislation and national policy.
- 7.3. Increased standardisation of information is a priority (as for digitisation, as set out in section 5 above) and this covers all key evidence and data. This might include the following types of document:
 - data on development need - e.g., economic development needs assessments;
 - data on allocated sites – e.g., assessment and selection criteria, Housing and Employment Land Availability Assessments;
 - impact assessments – e.g., transport assessments.
- 7.4. It is appreciated that data and evidence can change throughout the preparation of a local plan, so it is proposed to introduce a mechanism to ‘freeze’ data at an agreed point. Three benchmark points are suggested:
 - i. After initial input (i.e., the information would not be updated if a new iteration comes out); or
 - ii. Agreeing the scope of evidence at a gateway assessment; or
 - iii. At publication/submission

8. Chapter 6 – Gateway assessments during plan-making

- 8.1. Currently local plans are submitted by the LPA to PINS, who operate on behalf of the Secretary of State and manage the examination process. It is proposed to replace this with a ‘gatekeeper’ organisation to manage the end-to-end gateways process, including appointments on behalf of the Secretary of State.

- 8.2. Prior to each gateway, the planning authority will prepare a short report detailing progress against a series of key topics. This report will take the form of a digital template, provided by government.
- 8.3. At the first and second gateways, it is expected that the authority will be asked to identify up to five issues which pose risks to the soundness and/or legal or procedural compliance of the plan.
- 8.4. During the first and second gateways, an interactive workshop day will be planned and executed by the appointed person(s) to work through the issues identified and provide initial observations and advice to the planning authority. This is unlikely to be necessary for the third gateways.
- 8.5. The cost of the gateways processes would be paid by the planning authority, with a standard fee for each gateway defined in regulations.

9. Chapter 7 – Plan examination

- 9.1. It is proposed to change this so that only the LPA can respond to Matters, Issues and Questions (MIQs) - previously, any interested party could respond to these.
- 9.2. It is also proposed to streamline the Main Modifications stage so that only the most significant amendments arising from the Examination are the subject of further consultation. This might include, for example, where a new site is to be added into the plan. It is also proposed to shorten this consultation period by 3 weeks to make it 3 weeks.
- 9.3. Finally, it is proposed to introduce a mechanism to enable Inspectors to pause the Local Plan Examination for a period of not longer than 6 months. Currently there is no time limit to the pause period.

10. Chapter 8 – Community engagement and consultation

- 10.1. Chapter 10 of the consultation covers community engagement and consultation. It should be noted that much of the impetus for change in the plan-making process arises from the Government's intention for it to be easier for individuals and communities to engage with the planning process. Better use of technology has been identified as a key mechanism for this, so there is emphasis in this section on the use of digital engagement tools and templates.
- 10.2. The current 'Statement of Community Involvement' (SCI) would be replaced by details of community engagement set out in Project Initiation Document at the inception of the process. There is a strong emphasis on early participation, which broadly mirrors the current Regulation 18 stage.

11. Other provisions within the consultation

- 11.1. The remaining chapters in the consultation set out a number of related matters, some of which will be subject to further guidance or regulation in due course. These are summarised below.
- 11.2. Chapter 9 gives plan making authorities the statutory power to require that “prescribed public bodies” provide assistance to develop or review the plan and should be engaged at the four month ‘scoping’ phase. The “prescribed public bodies” are set out in a list which includes, for example, Natural England, Civil Aviation Authority, Homes & Communities Agency, Integrated Care Boards and the Office of Road and Rail.
- 11.3. Chapter 10 details to monitoring requirements for plans and proposes to replace the existing Annual Monitoring Report (AMR) with an annual return to Government. This would take the form of a standard template and would report progress on a small number of nationally prescribed objectives including, for example, housing and employment floorspace, environment and open space, and Environmental Outcome Reports. There would be a requirement for more detailed reports to be provided on all policies after 4 years after adoption.
- 11.4. Chapter 11 covers Supplementary Plans, which are prepared by LPAs to cover particular issues which may arise outside of the formal plan making process, or where light touch guidance is required rather than policy. Supplementary Plans are often limited geographically to matters relating to a specific site, or two or more nearby sites. However, a Supplementary Plan may set out a design code, which may cover a wider area. Existing Supplementary Planning Documents (SPDs) will remain in force until planning authorities adopt a new style local plan.
- 11.5. Chapter 11 advises that new Supplementary Plans will not be subject to the defined 30 month preparation period but must have a minimum of one formal consultation stage. Regulations will be issued and will prescribe the procedure. The Bill’s approach to the independent examination of Supplementary Plans, however, is broadly modelled upon the existing arrangements for neighbourhood plans. The general rule is that the independent examination is to take the form of written representations.
- 11.6. Chapter 12 covers Minerals and Waste Plans, where the process is the same as for Local Plans.
- 11.7. Chapter 13 covers Community Land Auctions (CLA). These are a mechanism for capturing the uplift in land value arising from allocation, whereby landowners bid to have their land selected for allocation. The LPA will consider the planning merits of the site in the usual way but can also take into account financial benefits. If the land is allocated, the landowners’ offer becomes legally binding and the local authority can either pay the landowner the original bid price, or wait until the site is development ready (i.e., with planning permission and all the necessary infrastructure in place) and then sell on the option at an increased price

11.8. CLA are to be piloted by a small number of local authorities, under details set out in Part 5 of the LURB. The pilot schemes will be time-limited, expiring ten years after the date the first CLA regulations are made.

12. Next Steps

- 12.1. The proposed changes to the Local Plan processes are significant and Chapter 14 sets out the approach to the roll out and transition to the new system. It confirms the intention to continue under the current system to 30 June 2025, which is the latest date for plan-makers to submit plans for examination under the current system.
- 12.2. It is proposed that Regulations, policy and guidance on the new system will be provided by autumn 2024. LPAs can bid to be part of a first, small cohort of around ten “front runner” authorities to prepare new-style local plans from autumn 2024, and accepted LPAs will receive expert plan-making support from Government. These front runners are likely to be those LPAs with the most up to date plans, and after June 2025 the remainder will be grouped into cohorts of 25 and each group ranked chronologically.
- 12.3. Existing Development Plan Documents and saved policies will remain in force until the LPA adopts a new-style local plan. Any plans that become out of date during first 30 months (i.e., during the transition to the new system) will be considered as up to date for development management purposes.
- 12.4. The Broads Authority proposes to submit its replacement Local Plan by June 2025. This will be before the cut off period under the existing system.

13. Conclusion, Proposed Response to consultation and recommendation

- 13.1. The proposed changes are significant and will result in a different approach to plan making.
- 13.2. The consultation poses a number of questions about the proposed changes and the draft responses are set out at Appendix 1.
- 13.3. It is recommended that Members endorse the responses proposed. They will be submitted as the formal response of the Broads Authority.

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Date of report: 29 August 2023

Appendix 1 – Proposed response, with commentary, to the various questions posed.

Appendix 1 – Department for Levelling Up, Housing and Communities

Document: [Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms - GOV.UK \(www.gov.uk\)](https://www.gov.uk/levelling-up-and-regeneration-bill)

Due date: 18 October 2023

Status: Draft proposals

Proposed level: Planning Committee endorsed

Please note that the following table includes the questions asked by the Government, a commentary on how this would affect what we do when compared to what we do now and the proposed response to the question.

Question	Commentary	Proposed response to question
<p>Question 1: Do you agree with the core principles for plan content? Do you think there are other principles that could be included?</p>	<p>The core principles for plan content sound a lot like what we need to do to produce a Local Plan now. We already produce policies maps. But it is not clear how they can be kept up to date as they reflect the Local Plan on adoption. We already write a vision for the Local Plan. Most plans do a key diagram – we did not in the current Local Plan, but we can easily meet the requirements to produce a key diagram.</p>	<p>It is not clear what is meant by keeping policies maps up to date when they reflect the Local Plan on adoption. That will need greater explaining as it is not really possible to change things related to a Local Plan without going through the due process of consultation and examination.</p>
<p>Question 2: Do you agree that plans should contain a vision, and with our proposed principles preparing the vision? Do you think there are other principles that could be included?</p>	<p>Our Local Plan, and all others I have read, already include a vision. In terms of the principles to produce a vision, it is not clear how doing all of the things the consultation states will shorten the vision. But generally, the consultation proposals relating to the vision seem acceptable. Our vision is taken from the Broads Plan and therefore links to corporate strategies.</p>	<p>Generally, yes, but query if it is appropriate for a vision to include measurable outcomes; that sounds more like objectives or the monitoring framework. Final regulations will need to be really clear on what is meant by needing measurable outcomes.</p>

Question	Commentary	Proposed response to question
	<p>It may not be appropriate for a vision to include measurable outcomes; that sounds more like objectives or the monitoring framework.</p> <p>The idea of a digital framework for the vision sounds helpful.</p>	
<p>Question 3: Do you agree with the proposed framework for local development management policies?</p>	<p>It really depends on what the National Development Management Policies say and how they apply as one size rarely fits all, especially when protected landscapes are considered – the devil will be in the detail.</p> <p>Agree with ability to have local policies.</p>	<p>Agree with the ability to have local policies.</p> <p>On the subject of National Development Management Policies, care needs to be taken to ensure that smaller local planning authorities and protected landscapes are considered when drafting these as one size rarely fits all.</p>
<p>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?</p>	<p>Data standards to be introduced. Templates for local plans to be introduced.</p>	<p>Support the idea of standards and templates.</p>
<p>Question 5: Do you think templates for new style minerals and waste plans would need to differ from local plans? If so, how?</p>	<p>No comments.</p>	<p>No comments.</p>
<p>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?</p>	<p>But on the issue of the 30 months' timeframe for producing the Local Plan, this is a concern.</p>	<p>The last local plan for the Broads, with limited development and limited controversy, had an 18-month examination. That leaves 12 months to prepare a local plan and the evidence. The examination stage is out of the control of the Local Planning Authorities. 30 months to submit may be possible, but given the uncertainties, 30 months to adoption cannot be guaranteed.</p> <p>The diagram that shows 6 months for examination seems unrealistic. What about the 6 week consultation on modifications? What</p>

Question	Commentary	Proposed response to question
		about allowing for variations in timings of various committees? Broads Authority for example meet every 2 or 3 months.
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?	The PID idea may be useful.	Yes. Detailed requirements would be welcomed.
Question 8: What information produced during plan-making do you think would most benefit from data standardisation, and/or being openly published?	No comments.	No comments.
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?	<p>No real comments on digitising as generally, content with the idea, if the templates and requirements are set out in a timely manner. But the cost is important to understand. Some of the events that have been held recently that talk about digital innovations and systems sound great but fail to talk about the cost. There will be a large cost and how will LPAs pay for this?</p> <p>Being in pdf does not mean plans go out of date. Plans are static things, yes. To change, they then need to go through the Local Plan process. It is not clear what is being implied here. Just because a plan may be digital, it does not follow that it can be updated without needing to go through the local plan production process and examination.</p>	<p>Some of the digital innovations and systems seem really helpful, but they seem costly. It is not clear how Local Planning Authorities will be able to pay for digital plans.</p> <p>The document talks about plans being PDF and static and go out of date quickly. This is quite confusing as the Local Plan will not go out of date quickly. Indeed, it will need updating after 5 years as set out in the consultation. It is not clear what is being implied here or what the issue is. To update a Local Plan, the Local Plan process needs to be gone through.</p>

Question	Commentary	Proposed response to question
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?	The opportunities seem reasonable, but where will the money come from to pay for all of this?	Agree with the opportunities. The document does not say how this will all be paid for and that is an important consideration.
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?	No comments.	No comments.
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?	Our current Local Development Scheme is fairly simple.	No comments.
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?		
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?	Our approach to evidence is proportionate at the moment. A national approach to some topic areas would be helpful.	A national SFRA that comes up with the varying flood zones that is kept up to date would be logical. It would need to show flood zones 3a, 3b (rather than just flood zone 3 which EA do now) and climate change and surface water.
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?	Our evidence is proportionate anyway. Standardising seems logical.	Standardising seems logical.

Question	Commentary	Proposed response to question
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?	To not have to keep updating evidence during the production of a local plan would be welcomed.	Yes, this is supported.
Question 17: Do you support this proposal to require local planning authorities to submit only supporting documents that are related to the soundness of the plan?	This happens now – we only submit what is needed.	Yes, this is supported.
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?	This seems logical. However, it is not clear how much will these gateway assessments cost and where that money is coming from. Also, where will the Inspectors or other suitable people coming from to resource this?	Yes, this is supported. But the gateway assessments would add a financial burden to LPAs and it is not clear how much they would cost and how they would be paid for. Furthermore, where are the people, be it Inspectors or other suitable people, going to come from?
Question 19: Do you agree with these proposals around the frequency and timing of gateways and who is responsible?	This seems logical, but comments remain regarding cost and resource of personnel.	Yes, this is supported. But the gateway assessments would add a financial burden to LPAs and it is not clear how much they would cost and how they would be paid for. Furthermore, where are the people, be it Inspectors or other suitable people, going to come from?
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?	Same comments apply about the cost and resource. But it seems that the LPA would need to point out issues with the Local Plan production for the suitable person to assess. That seems slightly odd – if the LPA knows about the issues, why are they telling the gateway assessment person?	It does not make sense that the LPA would tell the gateway assessment person what the issues are. If the LPA know there are issues, they will try to address them. It seems more logical that the gateway assessment assesses progress and identifies issues itself.

Question	Commentary	Proposed response to question
Question 21: Do you agree with our proposal to charge planning authorities for gateway assessments?	Where will the money to pay for these gate way assessments, then the examination, come from?	No. It is not clear how LPAs are expected to pay for such assessments and then the examination.
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?	Sounds good in theory but is it fair to only consult on changes for 3 weeks rather than 6 weeks. Some people go away on holiday for a few weeks at a time and may miss the consultation.	Agreed that examinations could be quicker. But consulting for only 3 weeks rather than 6 weeks does not seem fair to interested parties who may be away for some or all of that time for example.
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?	One size rule rarely fits all circumstances. So perhaps there needs to be leeway in the length of time as well as the number of pauses.	The length of pause period needs to reflect the issue that the examination is being paused for. There could be the need for more than one period, if over time more issues are raised.
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?	Seems logical, although it will probably reflect the Statement of Community Involvement that we already have in place.	Yes, this is supported.
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?	People tend to want something to comment on of substance. Tend not to get many members of public commenting on issues and options stage for example, but get more interest when policies are drafted and sites identified.	Yes, this is supported.
Question 26: Should early participation inform the Project Initiation Document? What sorts of approaches might help to facilitate positive early participation in plan-preparation?	See above.	No comments.
Question 27: Do you agree with our proposal to define more clearly what the role and	Two rounds of consultation is supported. But the second one will have more comments as policies will be finalised and sites will be	Yes, this is supported. It should be noted that the second round of consultation is likely to garner more interest as policies are finalised

Question	Commentary	Proposed response to question
purpose of the two mandatory consultation windows should be?	identified. So, the second one won't necessarily be a quick and easy consultation round.	and sites for development identified. Questions to consider however: When do we do a call for sites to meet development needs? And what if sites are put forward later on in the process? How do we consult on those if we wish to include them?
Question 28: Do you agree with our proposal to use templates to guide the form in which representations are submitted?	Templates will be useful.	Yes, this is supported.
Question 29: Do you have any comments on the proposed list of prescribed public bodies?	The Broads Authority is not listed and neither are AONBs.	This needs to say 'National Parks Authorities and the Broads Authority'. This list should also include AONBs. They are not called Heritage England; it is Historic England.
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.	Setting the approach to assist in NPPG seems logical.	Yes, this is supported.
Question 31: Do you agree with the proposed requirements for monitoring?	We tend to monitor the areas proposed at the moment.	Yes, this is supported.
Question 32: Do you agree with the proposed metrics? Do you think there are any other metrics which planning authorities should be required to report on?	We tend to monitor the areas proposed at the moment.	Yes, this is supported. It needs to be made clear if other, more local issues, can be monitored.
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	No comments.	No comments.

Question	Commentary	Proposed response to question
there any other factors that would indicate whether two or more sites are 'nearby' to each other?		
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.	No comments.	No comments.
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?	This seems acceptable.	Yes, this is supported.
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.	Thresholds would be helpful. But where will all the Inspectors come from?	Yes, thresholds would be helpful. However, as we have queried elsewhere, where will the money to pay for this and the people to do the examination come from?
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?	The examiner needs to be able to make sure the document is as good as it can be. Using Neighbourhood Plan examinations as an example, the examiners are limited to what they can request changes to, leaving some issues with the Neighbourhood Plan that can	If Supplementary Plan examination is based on Neighbourhood Plans, then issues like factual changes or improvements to wording won't be addressed by the Examiner. When Examining Neighbourhood Plans, the Examiners can only amend things if there are issues with the basic

Question	Commentary	Proposed response to question
	improve it not able to or not needing to be addressed. The examination process for Supplementary Plans should learn from the experiences of Neighbourhood Plans and address any issues rather than just repeat them.	conditions, so they may well want to improve something, but if it is not related to basic conditions, they can't. So perhaps the scope of the examination needs checking.
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?	No comments.	No comments.
Question 39: Do you have any views on how we envisage the Community Land Auctions process would operate?	CLA will be piloted. Cans till do call for sites it seems which we would probably need to so.	No comments.
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?	No comments.	No comments.
Question 41: Which of these options should be implemented, and why? Are there any alternative options that we should be considering?	There may be a need for local plans to be updated before the 5 year period – perhaps a change in the local area could be a prompt.	LPAs should have the option to review their Local Plan earlier than 5 years if they deem it is required to. So, the options of the waves being the final backstop is supported.
Question 42: Do you agree with our proposals for saving existing plans and planning documents? If not, why?	There is nothing in this document about what happens to local plans adopted under existing system (prior to end of 2026) and how much weight those policies have and for how long and what happens if national development management policies come in that are different to some extent.	When regulations are finalised, it would be helpful to be clear about any issues that could arise with local plans that are adopted by the end of 2026. For example, how these interact with any National Development Management Policy.

Question	Commentary	Proposed response to question
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?	No comments.	No comments.