**Response to Levelling Up & Regeneration Bill: Reforms to national planning policy consultation**

March 2023

This consultation from Government seeks views on their proposed approach to updating the National Planning Policy Framework (NPPF). They are also seeking views on their prepared approach to preparing National Development Management Policies, how they might develop policy to support levelling up, and how national planning policy is currently accessed by users. In the preamble, Government makes it clear that that there will be subsequent reviews of planning, following the implementation of the proposals in the Levelling up and Regeneration Bill once its reaches Royal Assent.

The draft NPPF has been published alongside the consultation, with tracked changes so the suggested amendments to the NPPF are easy to identify. There are no proposed changes to Chapter 16, the heritage chapter, nor are there any proposed changes to definitions and footnotes mentioning heritage and the historic environment. A new consideration for heritage is the revised paragraph 161, which if kept would mean that ‘*significant weight should be given to the need to support energy efficiency improvements through the adaptation of existing buildings, particularly large non-domestic buildings, to improve their energy performance (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).’ It is important to note that ‘Proposals affecting conservation areas and listed buildings should also consider the policies set out in chapter 16 of this Framework’*.

**RESPONSE SUMMARY**

* BPT welcomes the overall shift in emphasis towards communities and seek much more of this in the forthcoming consultations. Earlier and more effective engagement with communities will lead to a less confrontational planning system and more authentic people centred, community focused placemaking.

# BPT welcomes a continued protection of the Green Belt that comes with Local Planning Authorities not being required to review and alter Green Belt boundaries if this is the only means of meeting objectively assessed need for housing.

# The changes to housing targets, to make them ‘advisory’, are very welcome. However, we remind you that Government continues to insist on using out-of-date projections (2014) and we urge an immediate change to guidance to insist (as previously) on most up-to-date

# projections. We also seek a review of the Standard Method, which does not make housing affordable and simply supports developers to build market homes where they want to.

# BPT strongly supports the changes proposed to paragraph 11 and the five-year housing supply. It is essential that councils can plan, instead of being subject to speculative development and planning by appeal.

# 'JUSTIFIED' must be reinstated as a soundness test in plan-making – a local authority must be able to demonstrate why it has chosen a strategy and to support it with appropriate evidence.

# Mentions of brownfield, farmland, climate and density are welcomed. However, this needs to go much further to include:

# Brownfield first policy for all areas

# Protection for BMV in policy, not footnote

# Climate - carbon impact assessment for local plans is essential

# Gentle density – that is not too high or too low, first and with design codes

# With regard to Environment – the six focus areas must be clearly set out in National Development Management Policies and NPPF and linked to Government’s environmental announcement January 2023.

**Consultation Questions**

Chapter 3

# Providing certainty through local and neighbourhood plans

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

YES

**Please set out the reasons for your answer**

Perhaps not to degree of detail currently required, but having set a figure, would be wise to monitor it’s take up. We can foresee a ‘stop-go’ situation with developers as 5-yr period progresses.

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

YES

Please set out the reasons for your answer

**3. Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on?**

YES

**Please set out the reasons for your answer**

**Or is there an alternative approach that is preferable?**

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

The guidance needs to include a formula for all LPAs to use when producing their 5- year land supply statement.

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

Guidance needs to be provided on when Neighbourhood Plans need to be reviewed. Increasing the protection is welcome. If Neighbourhood Plan properly prepared & adopted it shouldn’t be set aside lightly, otherwise what is the point of local involvement?

**Chapter 4**

**Planning for Housing**

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

YES

**Please set out the reasons for your answer**

Clarity always good. the NPPF *should* be clearer in stressing importance of planning for houses needed by communities.

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

Councils can plan with more certainty.

**8. Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs?**

YES, however

**Please set out the reasons for your answer**

There’s always an ‘unforeseen unknown’ lurking, so too much detail may create false security and leave the field open.

**Are there other issues we should consider alongside those set out above?**

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

YES

**Please set out the reasons for your answer**

Although, we have reservations that this would lead to on demand planning rather than capacity led place making.

Generally, we agree with a policy which means that ultimately there is less need to reduce the Green Belt.

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

YES

**Please set out the reasons for your answer**

* Evidence of demand must be up to date.
* Up to date evidence of local housing need and projected supply – and why that cannot be met by characterful approaches first.
* Evidence that density cannot be achieved without compromising character (height, scale, form) – it most cases it can.
* LA would need to produce good evidence to build at higher densities than normal in a specific area.
* Evidence of compliance with design codes, or placemaking polices that specify design criteria.

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

NO

**Please set out the reasons for your answer**

Plans must be justified.

**12. Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation?**

No comment

Please set out the reasons for your answer

**If no, which if any, plans should the revised tests apply to?**

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

NO

**Please set out the reasons for your answer**

It is a blunt tool that blurs the concept of need/evidence and design excellence for top down policy reasons.

And it is already demonstrated as undeliverable.

<https://andrewlainton.wordpress.com/2022/11/10/bristol-local-plan-rejects-35-urban-uplift-as-not-evidence-based/>

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

**Please set out the reasons for your answer**

Robust locally specific framework and polices for design excellence, nature positive placemaking and policy requirements for key worker and affordable homes and space standards.

Legislation should be introduced that provides local authorities with more powers to act against the ownership of empty property of private individuals or organisations, especially within areas of high demand. Additionally, we would like to see greater powers and extensive guidance introduced to local authorities when planning permission has been granted for new homes to be built but the land remains undeveloped. Given the scale of the housing shortage in England, we recommend that action should be taken.

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

We support any policy or guidance that would allow for greater cooperation between neighbouring authorities.

**Please set out the reasons for your answer**

**16. Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply?**

NO

**Please set out the reasons for your answer**

Authorities that have met their housing need in their Local Plan and have an up to date Local Plan so should benefit from the same rule as all other subsequent local plans – 5 (or 4) year land supply not apply. There seems to be no logical reason to require this.

If no, what approach should be taken, if any?

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

No comment

Please set out the reasons for your answer

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

YES

**Please set out the reasons for your answer**

Monitoring the number of permissions approved by the Council is a more appropriate way of measuring performance.

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

NO

**Please set out the reasons for your answer**

The wording in the consultation document talks about ‘permissioned enough housing’ not ‘permissions more than enough housing’. The 15% seems to be a made-up figure with no justification. It should therefore be 100% - if they can prove they have met at least their annual amount, the HDT is disengaged.

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

Ask for the number of net new dwellings permitted each year using a survey similar to the self-build survey from DELTA.

**Please set out the reasons for your answer**

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

If the Government is going to change things in the next few months at least wait until 2023 HDT is logical.

Please set out the reasons for your answer

## **Chapter 5**

**A planning system for communities**

**Top of Form**

**22. Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions?**

YES

**Please set out the reasons for your answer**

There is currently not enough leverage in planning policy and decision making.

The only way it is already addressed by the current wording of the NPPF is – ‘ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations’.

**If yes, do you have any specific suggestions on the best mechanisms for doing this?**

For developments of over 10 dwellings, make the requirement for affordable housing specific to minimum percentages of social rent tenure in policies.

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

YES, but only if totals included within overall permissions figure.

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

Perhaps reduce some of the tiers of statutory requirements required by LAs?

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

Affordable Housing can be required on schemes of 10 dwellings or more, generally.

Small sites could be below that threshold.

The threshold could be lowered.

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

YES

**Please set out the reasons for your answer**

‘Affordable’ generally needs to come into real world with definitions for genuinely affordable housing across the board – which is below inflated rental markets.

Rent caps are needed to support affordable housing for rent.

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

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

Probably not. Whilst policy does allow for exception sites in rural areas, we wonder whether this is the right thing to do. Given the drive for net zero, given that some places where exception sites in rural areas are proposed do not have any key services and transport links - allowing housing in remote areas, under the exceptions sites policies, is probably not the right thing to do given reliance on car use and C02 emissions. Later on, the consultation document talks about ‘pursuing sustainable patterns of development’. Further, given the cost of living crisis and the cost of diesel and the impacts that social isolation can have on people and their wellbeing, again, are exception sites in rural areas are the right thing to do?

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

Answer

Policies and SPD’s for community led developments.

One way could be a policy that specifies that housing targets within local plans must split new housing by tenure. This would be based on the needs of the community and further split into how the homes can be developed, including community-led developments. This way, local authorities can assess the types of homes they need and work to support the development of them accordingly. This will prevent an under-supply of specific types of homes and promote a wide range of types of development, including community-led developments.

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

YES/NO

**Please set out the reasons for your answer**

Yes, LPA’s need ability to enforce against non-completion of build out to approved plans – e.g. no holding on to potentially habitable buildings to wait for market to catch up. Land blocking where applicants are sitting on sites preventing them from contributing to need, should be regularised by planning law. This should be combined with clear guidance for local authorities of what should be considered substantial cause for refusing an application based on an applicant’s past behaviour.

Or is this potentially very dangerous? -Some developers may reach for their lawyers if they feel discriminated against, and secondly, if an application is turned down for this reason the design team won’t get paid.

**If yes, what past behaviour should be in scope?**

**31. Of the two options above, what would be the most effective mechanism?**

 Option 1 Option 2 Neither Indifferent

It is not clear how option 1 will work consistently across the country; how much bad behaviour and to what extent would, for example, merit a refusal on those grounds?

Option 2 seems a more consistent approach, subject to guidance.

Also need to consider how a developer or applicant can resolve their past behaviour. Perhaps if they rectify their past ‘mistakes’, the slate is wiped clean? Afterall, the community and LPA want that discrepancy or unauthorised development authorised, removed or improved.

**Please set out the reasons for your answer**

**Are there any alternative mechanisms?**

**32. Do you agree that the three build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly?**

Not sure

Please set out the reasons for your answer

**Do you have any comments on the design of these policy measures?**

There is reference to reporting to the LPA when they commence, but it would be useful if they were to report to the LPA when a dwelling is completed as well.

**Chapter 6**

**Asking for Beauty**

**Top of Form**

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

NO

**Please set out the reasons for your answer**

What *is* beauty? There is no definition of beauty. Many factors contribute to design excellence in placemaking and deserve equal emphasis. Beauty is too subjective. Beauty unquantifiable and highly variable. Inclusion in the draft NPPF is unnecessary - ‘well designed, attractive & healthy’ with potentially the addition of ‘sustainable’ and ‘well-constructed’ is surely enough.

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

NO

**Please set out the reasons for your answer**

As above. What *is* beauty? There is no definition of beauty. Many factors contribute to design excellence in placemaking and deserve equal emphasis. Beauty is too subjective. Beauty unquantifiable and highly variable. Inclusion in the draft NPPF is unnecessary - ‘well designed, attractive & healthy’ with potentially the addition of ‘sustainable’ and ‘well-constructed’ is surely enough.

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

YES

Accurate drawings are absolutely essential. Greater visual clarity is most effective and maintains the strength and integrity of a design if details are provided as part of the planning application. They also help support high standards of implementation and compliance with approvals.

**36. Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing Framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes?**

NO

Specific solution to building upwards may be totally inappropriate. In some areas it would significantly change the character of the place (detrimentally) and other forms of roof extension would be more appropriate.

**If no, how else might we achieve this objective?**

Parameters and design codes for gardens over a certain size, existing outbuilding, mews, and garages?

## **Chapter 7**

**Protecting the environment and tackling climate change**

**Top of Form**

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

Artificial grass too specific for national policy. Guidance for avoiding dangers of aggregation of small interventions could be helpful. Guidance for small nature positive interventions and biodiversity enhancements.

National policy must set higher space standards for green infrastructure, gardens, community gardens and allotments in new developments.

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

NO

**Please set out the reasons for your answer**

Again, cart leading horse (housing trumps all!)

3a and indeed 3b land is scarcely mapped. That needs to be the first exercise – nationally map 3a and 3b (as well as check the areas which are other grades) and then share that dataset.

The proposed amendment to the NPPF is through a footnote. That seems to not give the issue as much weight as it would have in the actual text. Suggest it is included in the main text of the NPPF.

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

**Answer, including any supporting information**

The method could include:

Carbon auditing

Embodied CO2 assessments

CO2 in use

Carbon savings from renewables such as rooftop solar

Transport emissions from development.

But LPAs are not likely to have the internal expertise for such an assessment and would need to contract that out probably at an additional cost which will need to be met somehow, at times where budgets are tight.

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

Changes to the NPPF need to explore how planning policy (and primary legislation) can tackle the inefficiency of the existing housing stock. Which includes measures that are not within the remit of planning. E.g. applicants would be required to provide a whole home assessment and decarbonisation strategy plan for works requiring planning permission, energy retrofits and renewables.

New schemes that come forward are few in number when compared to the buildings that are already out there. Changes to the NPPF need to explore how planning policy can tackle the efficiency (water, energy) of the existing stock of dwellings somehow.New schemes that come forward are few in number when compared to the buildings that are already out there. Changes to the NPPF need to explore how planning policy can tackle the efficiency (water, energy) of the existing stock of dwellings somehow. New schemes that come forward are few in number when compared to the buildings that are already out there. Changes to the NPPF need to explore how planning policy can tackle the efficiency (water, energy) of the existing stock of dwellings somehow. New schemes that come forward are few in number when compared to the buildings that are already out there. Changes to the NPPF need to explore how planning policy can tackle the efficiency (water, energy) of the existing stock of dwellings somehow. New schemes that come forward are few in number when compared to the buildings that are already out there. Changes to the NPPF need to explore how planning policy can tackle the efficiency (water, energy) of the existing stock of dwellings somehow. New schemes that come forward are few in number when compared to the buildings that are already out there. Changes to the NPPF need to explore how planning policy can tackle the efficiency (water, energy) of the existing stock of dwellings somehow. New schemes that come forward are few in number when compared to the buildings that are already out there. Changes to the NPPF need to explore how planning policy can tackle the efficiency (water, energy) of the existing stock of dwellings somehow. Bottom of Form

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**Chapter 8**

**Onshore wind and energy efficiency**

**Top of Form**

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

YES

**Please set out the reasons for your answer, including any views on specific wording changes to the existing paragraph**

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

YES

**Please set out the reasons for your answer, including any views on specific wording changes to the existing paragraph**

**43. Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework?**

Footnote 62 – it is not clear how allowing these orders to deliver turbines fits in areas where local plans do not identify areas for wind turbine. This needs greater explanation and justification.

Footnote 63 – a SPD cannot make policy and if a SPD identifies areas where wind turbines can go, that is making policy. Also, the document proposes the removal of SPDs so it is not clear why SPDs are seen as a way of addressing this issue, if they are to be removed.

Please set out the reasons for your answer, including any views on specific wording changes to existing footnote 54

**Do you have any views on specific wording for new footnote 62?**

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

YES

**Please set out the reasons for your answer, including any views on specific wording changes to the proposed new paragraph**

But.

The proposed NPPF wording does not ‘give significant weight to proposals’, which would make more sense – it says ‘gives significant weight **to the need** to’. As worded, 161 is not clear in what it actually wants to happen.

## **Chapter 9**

**Preparing for the new system of plan-making**

**Top of Form**

**45. Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system?**

No comment

Please set out the reasons for your answer

If no, what alternative timeline would you propose?

**46. Do you agree with the proposed transitional arrangements for plans under the future system?**

No comment

Please set out the reasons for your answer

If no, what alternative arrangements would you propose?

**47. Do you agree with the proposed timeline for preparing neighbourhood plans under the future system?**

No comment

**Please set out the reasons for your answer**

**If no, what alternative timeline would you propose?**

**48. Do you agree with the proposed transitional arrangements for supplementary planning documents?**

NO

**If no, what alternative arrangements would you propose?**

Leave them as they are? Must retain content of existing SPD at current statutory level as a weighty material concern – otherwise a waste of past effort and present expectation. We would be concerned that if SPDs aren’t replicated, huge previous work & expertise will go to waste, and LAs will have to ‘reinvent the wheel’.

SPDs should have weight until the new Local Plan is adopted. They contain important information and guidance and are therefore instrumental to good planning. By affording some weight until the new Local Plan is adopted, this gives time for what is written in the SPD to become part of the Local Plan and so the guidance and requirements are not lost. It is unreasonable to erase such important information without allowing it to be part of another document so there is continuation.

Not exactly clear what ‘Supplementary Plan’ involves.

## **Chapter 10**

**National Development Management Policies**

**Top of Form**

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

YES

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

It is imperative that the Government remembers protected landscapes when coming up with these. How can we be sure NDMPs won’t ride roughshod over local policies?

When writing these, the Government will need to have all LPAs and their areas in mind when coming up with these National Development Management Policies – city, rural, protected landscapes – all are different.

Taking permitted development rights as an example, which could be classed as National Development Management Policies, there are many exemptions to certain rights – could that be the case for these National Development Management Policies?

There is also a big question around engagement from members of the public and local groups that LPAs are able to do when consulting on these?

When will the National Development Management Policies be reviewed? Every five years like Local Plans? Will they be subject to HRA and SA like local plan policies?

Can the National Development Management Policies be ‘added’ or supplemented to through Local Plan policies?

Might be helpful for ease of use if relevant NDMP policies (with acknowledgement) were included verbatim within each Local Plan.

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

YES

Seems reasonable as presented as principles not details.

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

YES

Heritage, Retrofit, Flood risk, SuDS.

Holiday lets such as Air BNB requires amendments to the Use Class Order and transference to NDMP to limit impact on residential housing stock in high tourism locations.

## **Chapter 11**

**Enabling Levelling Up**

**Top of Form**

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

We have doubts!

Potentially mandating that planning applications for 50 homes provide clear evidence of contributions to any relevant missions, provides more of a chance to make a meaningful impact.

The missions as they are fairly subjective. An example: “By 2030, homicide, serious violence and neighbourhood crime will have fallen, focused on the worst affected areas.”

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

Build the right homes in the right places. Focus on community focused and led-planning with strong community assets.

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

YES

Always ‘brownfield first’ as general rule in all urban areas. Brownfield first in ALL areas with good access to key services by modes other than single occupancy car use seems logical.

Here the “Gentle density” of the Building Better Building Beautiful report which talked of building heights of 3 – 7 stories or so in new development, has been changed into “gentle increases in density” in existing development which is obviously a different thing.

We fear ‘gentle densification’ may become weasel words – density needs to be not too high or not too low depending on context, along with green infrastructure within urban areas.

Density should be backed up with design codes.

Some long-term brownfield land becomes important natural habitat so care is needed to sustain biodiversity.

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

YES

**Please set out the reason for your answer**

Safe inclusive placemaking is a key tenet of well-designed places required by planning policy as the norm. The NPPF is only one of many routes to protecting vulnerable groups. The government should be looking at the root causes of the violence and discrimination suffered by these groups.

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## **Chapter 13**

**Practical changes and next steps**

**Top of Form**

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

Answer

No comment

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

Answer

No comment

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* [Privacy](https://consult.levellingup.gov.uk/privacy_policy/)