

25 AUGUST 2023

PC2-23 | LOCAL PLANS

Summary

Local plans are generally produced by local planning authorities (LPAs) but local (parish and town) councils have a huge interest in them and such plans are directly linked to neighbourhood plans which many local councils produce. The Department for Levelling Up, Housing and Communities (DLUHC) have issued a consultation seeking views on proposals to implement the parts of the Levelling Up and Regeneration Bill which relate to plan-making, to make plans simpler, faster to prepare and more accessible.

The main consultation document can be downloaded [here](#) . The consultation closes at DLUHC on 18 October, 2023.

Context

The consultation seeks insight on:

- how local plans (and minerals and waste plans) can be made simpler to understand and use.
- how local plans (and minerals and waste plans) can be positively shaped by the views of communities about how their area should evolve.

NALC will be responding to this consultation as many local councils will have an interest in feeding in their own views on how the local plan making process can be reasonably made more efficient without the government seeking to implement wildly unrealistic timeframes, also ensuring that the golden thread between timescales required to update and make local plans and those required to make and update neighbourhood plans, is retained undamaged.

NALC's current policy positions

- The government has said it wants to see local planning authorities reviewing their local plans every five years. NALC will be arguing very strongly that this is an impractical requirement that places impossible pressures on LPAs and on neighbourhood planning groups whose plans are aligned to the local plans. A review every 10 years would be demanding enough. The emphasis should be on the quality and the soundness of the

plans and not on the speed with which it might be possible to produce them.

- NALC will support a planning system which incorporates a significant role for local councils. It will not support any diminution of local councils' statutory right to comment on planning issues at all stages of their evolution, whether they be development planning matters or spatial planning policies.
- NALC will support a soundly based planning system which represents the most reliable tool for the sustainable allocation of land, and which represents the three pillars of sustainability equally, i.e., social, economic, and environmental factors.
- NALC is arguing for the complete removal of the whole concept of National Development Management Policies (NDMPs) which will have the effect of unjustly trumping any local or neighbourhood plan.

Consultation Questions

The main consultation questions NALC will be responding to in this consultation are as below and NALC seeks the views of county associations and member councils in response to these questions to help inform its own submission to DLUHC:

Chapter 1: Plan content

Question 1: Do you agree with the core principles for plan content? Do you think there are other principles that could be included?

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?

Question 3: Do you agree with the proposed framework for local development management policies?

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?

Question 5: Do you think templates for new style minerals and waste plans would need to differ from local plans? If so, how?

Chapter 2: The new 30-month plan timeframe

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?

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?

Chapter 3: Digital plans

Question 8: What information produced during plan-making do you think would most benefit from data standardisation, and/or being openly published?

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?

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?

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?

Chapter 5: Evidence and the tests of soundness

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?

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?

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?

Chapter 7: Plan 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?

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?

Chapter 8: Community engagement and consultation

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?

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?

Question 26: Should early participation inform the Project Initiation Document? What sorts of approaches might help to facilitate positive early participation in plan-preparation?

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?

Question 28: Do you agree with our proposal to use templates to guide the form in which representations are submitted?

Chapter 9: Requirement to assist with certain plan-making

Question 29: Do you have any comments on the proposed list of prescribed public bodies?

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.

Chapter 13: Community Land Auctions

Question 39: Do you have any views on how we envisage the Community Land Auctions process would operate?

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?

Chapter 14: Approach to roll out and transition

Question 41: Which of these options should be implemented, and why? Are there any alternative options that we should be considering?

Chapter 15: Saving existing plans and planning documents

Question 42: Do you agree with our proposals for saving existing plans and planning documents? If not, why?

Your evidence

Please email your responses to this consultation to chris.borg@nalc.gov.uk by 17.00 on 22 September 2023. County associations are asked to forward this briefing onto all member councils in their area.

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