

## Report of the Portfolio Holder for Economic Development and Asset Management

### GOVERNMENT CONSULTATION ON REFORMS TO NATIONAL PLANNING POLICY

#### 1. Purpose of Report

To decide the Council's response to the Government's current consultation on reforms to national planning policy.

#### 2. Recommendation

**Cabinet is asked to RESOLVE that the proposed responses in Appendix 2 of this report of the Council's responses to the Government's consultation be approved.**

#### 3. Detail

The Government is consulting on potential reforms to national planning policy, involving proposed changes to the National Planning Policy Framework (NPPF). The Government states that it is "also seeking views on our proposed approach to preparing National Development Management Policies, how we might develop policy to support levelling up, and how national planning policy is currently accessed by users". The Government also states that a "fuller review of the framework will be required in due course, and its content will depend on the implementation of the government's proposals for wider changes to the planning system, including the Levelling-up and Regeneration Bill".

As well as National Development Management Policies, subjects referred to in the consultation include: housing need and green belt boundaries; the tests of 'soundness' for Local Plans; the 'uplift' to housing requirements for large cities such as Nottingham; the 'Duty to Co-operate'; five-year housing land supply; the use of 'buffers' in housing land supply calculations; the Housing Delivery Test; 'irresponsible planning behaviour' by applicants; onshore wind; Supplementary Planning Documents; and 'social rent' homes.

A fuller summary of the consultation is included as a 'Briefing Note' at Appendix 1 of this report and Appendix 2 gives proposed responses to the consultation questions. The consultation document itself is available at <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy> and the proposed changes to the NPPF are at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1126647/NPPF\\_July\\_2021\\_-\\_showing\\_proposed\\_changes.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1126647/NPPF_July_2021_-_showing_proposed_changes.pdf).

The consultation runs between 22 December 2022 and 2 March 2023.

4. Financial Implications

The comments from the Head of Finance Services were as follows:

There are no financial implications to consider at this consultation stage.

5. Legal Implications

The comments from the Head of Legal Services were as follows:

Whilst there are no direct legal implications arising from this report, the proposed revisions represent a clear steer from the Government to align the NPPF with the Levelling Up and Regeneration Bill. Further consultation is scheduled to take place on the rest of the NPPF and National Development Management Policies (once the Bill has been passed) from Spring 2023, with further updates to the NPPF to arrive later this year

6. Human Resources Implications

The comments from the Human Resources Manager were as follows:

Not applicable.

7. Union Comments

The Union comments were as follows:

Not applicable.

8. Data Protection Compliance Implications

No implications.

9. Equality Impact Assessment

Not applicable.

10. Background Papers

Nil

## Briefing Note

### Background

The [Levelling Up and Regeneration Bill](#) is currently before Parliament. The Bill makes a number of changes to existing local government, planning, and compulsory purchase legislation.

Alongside the proposals in the Bill, on 22 December 2022 the government launched a [consultation on reforms to national planning policy](#). This Briefing Note focuses on this consultation and the changes proposed.

The consultation is open until 2 March 2023.

### Extent of the Consultation

The consultation includes:

1. Specific changes that are proposed to be made immediately to the National Planning Policy Framework (NPPF). These are set out in a [tracked changes document](#). The government has indicated that they intend to introduce these changes by spring 2023.
2. Alongside these specific changes, the consultation seeks views on a wider range of proposals which will be considered in the context of a wider review of the National Planning Policy Framework and will follow Royal Assent of the Levelling Up and Regeneration Bill. The government will consult on the detail of these wider changes next year, reflecting responses to this consultation.
3. The consultation sets out the envisaged role for National Development Management Policies (NDMPs) and asks for views on how NDMPs are implemented. The government states they will consult on the detail later.

#### 1. Changes proposed to the NPPF (Spring 2023)

- Local authorities will be expected to continue to use local housing need, assessed through the standard method, to inform the preparation of their plans; although the ability to use an alternative approach where there are exceptional circumstances that can be justified will be retained. The government states that it will make clearer in the NPPF that the outcome of the standard method is an advisory starting-point to inform plan-making and proposes to give more explicit indications in planning guidance of the types of local characteristics which may justify the use of an alternative method.
- Housing need would not need to be met in full if it would mean building at densities significantly out of character with the existing area or if there is clear evidence of past over-delivery.
- There would not be a requirement to review and alter Green Belt boundaries if this would be the only means of meeting the objectively assessed need for housing over the plan period.

- Plans would not be required to be ‘justified’. Instead, the examination would assess whether the local planning authority’s proposed target meets need so far as possible, takes into account other policies in the Framework, and will be effective and deliverable.
- The government intends to retain the uplift of 35 per cent to the assessed housing need for the 20 largest towns and cities in England (which includes Nottingham). The draft NPPF revisions would require that this uplift is, “so far as possible”, met by the towns and cities concerned rather than exported to surrounding areas, except where there is voluntary cross-boundary agreement to do so.
- Councils would no longer have to apply buffers to the five-year housing land supply.
- Additional references to building ‘beautiful’ places and recognition that mansard roofs are an appropriate form of upward extension.
- Changes to enable the re-powering of renewable and low carbon energy (replacing old wind turbines with newer models), provided that the impacts of any development proposal are or can be made acceptable in planning terms.
- Additional text to state 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.
- The government is considering suspension or amendment of the usual consequences of failure of the 2022 Housing Delivery Test.

## 2. Proposed Future Changes to National Policy (Expected 2024)

- The government says it will review the implications for the standard method of new household projections data based on the 2021 Census, which is due to be published in 2024. But it is not proposing any changes to the standard method formula itself through this consultation.
- The duty to co-operate is to be replaced with an “alignment policy”. The duty will remain in place until those provisions come into effect. Further consultation on what should constitute the alignment policy will be undertaken.
- For the purposes of decision making, where emerging local plans have been submitted for examination or where they have been subject to a Regulation 18 or 19 consultation which included both a policies map and proposed allocations towards meeting housing need, those authorities will benefit from only having to demonstrate a four-year supply of land for housing, instead of the usual five.
- Past “irresponsible planning behaviour” by applicants could be taken into account when applications are being determined. Primary legislation would be needed to enact such measures.
- Government data will be published on developers of sites over a certain size who fail to build out according to their commitments. Delivery will also become a material consideration in planning applications.

- Developers will be required to explain how they propose to increase the diversity of housing tenures to maximise a development scheme's absorption rate (which is the rate at which homes are sold or occupied).
- A financial penalty for developers that are building out too slowly will be consulted on separately.
- There will be a review of the current degradation provisions for Biodiversity Net Gain "to reduce the risk of habitat clearances prior to the submission of planning applications, and before the creation of off-site biodiversity enhancements". The government will also consider how "the threat to wildlife created by the use of artificial grass by developers in new development" can be halted.
- Views are sought on effective and proportionate ways of deploying a broad carbon assessment of new developments, including what they should measure, what evidence could underpin them such as Local Area Energy Plans, and how they may be used in a plan-making context or as a tool for assessing individual developments.
- Policy and guidance in relation to the production of Strategic Flood Risk Assessments will be reviewed.

### 3. National Development Management Policies (NDMPs)

- These would be given the same weight in certain planning decisions as policies in local plans, neighbourhood plans and other statutory plans. They would cover planning considerations that apply regularly in decision-making such as general policies for conserving heritage assets, and preventing inappropriate development in the Green Belt and areas of high flood risk.
- The government states that the existing National Planning Policy Framework already contains development management policies of this type that can be significant 'material considerations' but these do not have any statutory status. The NDMPs would include these as policies and would also cover other national priorities, "for example net zero policies that it would be difficult to develop evidence to support at a district level, but which are nationally important."
- The intention is that National Development Management Policies, once introduced, would be set out in a separate document to the rest of the National Planning Policy Framework. The latter would be re-focused on principles for plan-making.
- Further consultation will follow on our proposals for the draft National Development Management Policies themselves following passage of the Bill.

### 4. Transition Arrangements

- Councils will have until 30 June 2025 to submit their local plans for independent examination under the existing legal framework. This will mean that existing legal requirements and duties, for example the Duty to Cooperate, will still apply. Plans must then be adopted by 31 December 2026.

- Under the reformed system, which is expected to go live in late 2024, there will be a requirement for local planning authorities to start work on new plans by, at the latest, 5 years after adoption of their previous plan, and to adopt that new plan within 30 months. Authorities that have prepared a local plan which is less than 5 years old when the new system goes live will not be required to begin preparing a new-style plan until their existing plan is 5 years old.
- In the reformed planning system, authorities will no longer be able to prepare supplementary planning documents (SPDs). Instead, they will be able to prepare Supplementary Plans, which will be afforded the same weight as a local plan or minerals and waste plan. When the new system comes into force (expected late 2024), existing SPDs will remain in force for a time-bound period, until the local planning authority is required to adopt a new-style plan. Current SPDs will automatically cease to have effect at the point at which authorities are required to have a new-style plan in place.

## APPENDIX 2

## Proposed responses to the consultation questions

Question Number	Question Wording	Proposed Response
1	Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?	<p>Agree that this provides a strong incentive for local authorities to have an up-to-date plan in place and reduces the risk of speculative development when a recently adopted plan is in place.</p> <p>There is a case for saying that 5YHLS requirements should be removed in all cases, as they are heavily based on estimates/speculation and the penalties for failing to meet them are unduly harsh.</p>
2	Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?	Agree that buffers should not be required as this adds complexity and increases uncertainty. The logic behind the various buffer percentages is not clear. It is more important to ensure that a robust 5-year housing land supply is in place.
3	Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?	Agree that an oversupply of homes early in the plan period should be taken into consideration. This prevents local authorities, who are successfully delivering houses, being punished by having to find additional housing sites later in the plan period. This currently acts as a disincentive to trying to bring forward some sites earlier in the plan period.
4	What should any planning guidance dealing with oversupply and undersupply	See above.

Question Number	Question Wording	Proposed Response
	say?	
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?	Broadly supportive of this amendment.
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?	Broadly supportive of the recognition of the importance of preparing and maintaining up-to-date plans and the importance of infrastructure to support the provision of homes.
7	What are your views on the implications these changes may have on plan-making and housing supply?	Please see the responses to other questions above and below.
8	Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?	Agree that policy needs to be clear on what may constitute an exceptional circumstance. A lack of clarity will create more uncertainty and further delay. It may also provide false expectations for local communities regarding how far housing numbers can be reduced. Other issues which may be considered would be significant infrastructure constraints which cannot be overcome within the plan period.
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?	Agree that national policy should make this clear. However, there may be implications if local authorities which adjoin urban areas have to meet any of the unmet need created by the urban uplift (question 15). This approach will also prevent any potential strategic review of Green Belt boundaries which may still be important. There is a potential for different interpretations regarding the

Question Number	Question Wording	Proposed Response
		<p>appropriate density for building, particularly in light of references elsewhere to gentle increases in density.</p> <p>There may be a case for reviewing, at national level, the weight that is given to Green Belt issues relative to all other planning issues, bearing in mind that some Green Belt boundaries may have been established several decades ago and it may not necessarily be entirely appropriate that they should remain completely unchanged into the indefinite future.</p> <p>The detailed wording may also benefit from review as, taken literally, it could be taken as implying that Green Belt boundaries would be required to be reviewed and altered if this was one of two or more means of meeting 'objectively assessed need' (rather than 'the only means').</p>
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?	This may be dependent on the success of design codes. It may well be appropriate for expectations regarding densities to be set out in local design codes/guides. It may be difficult to provide evidence as density will vary significantly across most council areas.
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?	<p>Difficult to know how significantly this would change the examination process in practice.</p> <p>It seems somewhat odd to remove the requirement for plans to be 'justified', given that 'justified' means that the strategy should be 'appropriate'</p>

Question Number	Question Wording	Proposed Response
		and that the plan should be based on 'proportionate' evidence. However, the consultation document says that the change is in order to ensure 'proportionate' assessment, which would be welcome.
12	Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?	No comment to make.
13	Do you agree that we should make a change to the Framework on the application of the urban uplift?	The 35% 'uplift' does not appear to be based on evidence or analysis, and the choice of areas to which it applies appears to be somewhat arbitrary. There seems to be a contradiction between the emphasis that the standard method is an advisory starting point and the application of an arbitrary 35% uplift which is not evidence led.
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?	Guidance regarding what the implications are if the uplift cannot be met.
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?	It should not be expected that neighbouring authorities have to meet any unmet need and it should be for the urban authorities to meet it as far as they possibly can. The uplift is not based on evidenced need. Neighbouring authorities, such as Broxtowe, would be required to review Green Belt boundaries if they were expected to meet any of the need created by the urban uplift. In Greater Nottingham, there is currently good co-

Question Number	Question Wording	Proposed Response
		operation between authorities on a range of strategic planning issues. However, if neighbouring authorities have to also consider the uplift, this may act as a deterrent for continuing close cooperation.
16	Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?	Agree that there should be incentives in place to continue plan-making in the interim.
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 to make.
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?	Agree in principle with this approach, particularly because it acknowledges that authorities cannot ensure that permissions are implemented. However, there needs to be clear guidance on how these planning permissions should be recorded (using existing recording methods) to reduce the potential for the figures to be challenged, which would add further complexity, uncertainty and delay into the system.
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?	Difficult to comment on this without seeing evidence for the 15% contingency.

Question Number	Question Wording	Proposed Response
20	Do you have views on a robust method for counting deliverable homes permissioned for these purposes?	No comment to make.
21	What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?	Due to the uncertainty, the consequences should be suspended until a new approach has been finalised.
22	Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?	<p>Agree that securing social rent is a priority and that this should be reflected within national planning policy, so as to give authorities greater ability to insist on the provision of social rented homes.</p> <p>Mechanisms could be similar to, or preferably in place of, those that currently apply to 'first homes'.</p>
23	Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?	Do not disagree with the inclusion of the text referring to specialist older people's housing, however arguably this was already included in the current paragraph with the reference to 'older people'.
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)?	No comment to make.
25	How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?	No comment to make.
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	No comment to make.

Question Number	Question Wording	Proposed Response
	developers and almshouses – to develop new affordable homes?	
27	Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?	No comment to make.
28	Is there anything else that you think would help community groups in delivering affordable housing on exception sites?	No comment to make.
29	Is there anything else national planning policy could do to support community-led developments?	No comment to make.
30	Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?	<p>It would be very difficult to apply in practice and there would be a significant risk of legal challenge. As noted in the consultation document, it is a long-standing principle that planning decisions should be based on the planning merits of the proposed development, and any attempt to assess whether applicants or developers were "bad" or "irresponsible" would involve a very high degree of subjectivity.</p> <p>So as to encourage 'responsible behaviour', it may be appropriate to require that, in order for sites to be included in the Strategic Housing Land Availability Assessment (SHLAA), landowners/developers enter into a simple s106 Agreement with the Local Planning Authority which would commit them to using 'best endeavours' to bring the site forward for development.</p>

Question Number	Question Wording	Proposed Response
31	Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?	Option two would be the preference as it sets a clear distinction between material planning considerations and assessing an applicant's behaviour. This prevents questions regarding how much 'weight' would need to be applied.
32	Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?	<p>They may help to make developers more accountable but it is questionable whether it will result in quicker build out rates. (They could be seen as something of a 'token gesture' towards addressing the issue.) Developers in relation to part c are likely to only submit optimistic trajectories. It may also act as a disincentive for some developers to develop 'difficult' sites where the build out rate may be slow.</p> <p>It would be difficult to decide on what constituted a build-out rate that was too slow, and it would be very difficult to control or enforce compliance with the submitted trajectories.</p>
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 fundamental disagreement with this emphasis (although it may have little impact in practice).
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 fundamental disagreement with the changes (although they may have little impact in practice).
35	Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to	It is difficult to see how this will be different to the current situation, as conditions referring to the drawings and

Question Number	Question Wording	Proposed Response
	support effective enforcement action?	materials are already included. However, this would be welcome as it would give authorities more back up if developments are of poor design.
36	Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?	<p>No specific comments to make other than that local authorities will generally be in the best position to consider applications based on their own individual merits.</p> <p>The emphasis given to mansard roofs, relative to other issues in the NPPF, appears excessive.</p>
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?	<p>Supportive of small scale nature interventions but no specific comments to make.</p> <p>(It may be worth noting that the use of artificial grass may in some circumstances have advantages over hard surfacing, and that the biodiversity benefits of closely-mown grass may be limited.)</p>
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 most versatile agricultural land?	No comment to make.
39	What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?	No comment to make.

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40	Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?	No comment to make.
41	Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?	No objection to the proposed change.
42	Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?	No objection to the proposed change.
43	Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?	<p>This still makes it very difficult to bring forward new wind development due to uncertainty regarding planning impacts 'identified by local communities' compared to other ('standard') material planning considerations. Also it is difficult to measure 'local support'. It is not clear why the government considers that proposals for wind energy development should not be considered on the same basis as all other forms of development, i.e. based on the development plan and taking account of all other material considerations.</p> <p>Incidentally, here and elsewhere, it would be strongly preferable for all significant elements of the NPPF to be incorporated in the main body of the document, rather than in footnotes.</p>
44	Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings	This is welcome, as it would give authorities more leverage to insist on better energy efficiency.

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	to improve their energy performance?	
45	Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?	No objection to the timescale proposed but there is uncertainty what the timescales mean for areas with two-part plans, such as Broxtowe. For example, there is uncertainty about whether, in order to update the Part 2 Plan, we would need to start preparing a new style plan; and whether the Part 1 Strategic Plan would need to be reviewed so as to be a spatial development strategy.
46	Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?	Same comments as above.
47	Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?	No comment to make.
48	Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?	It may be very challenging to prepare Supplementary Plans within the timescales proposed, particularly if Local Plans are having to be prepared under the same timescales. There is significant uncertainty regarding the process of preparing the Supplementary Plans.
49	Do you agree with the suggested scope and principles for guiding National Development Management Policies?	There would be an advantage in having national policies, provided that they focused on issues for which national consistency is genuinely important, so that Local Plans can focus on specific issues.

Question Number	Question Wording	Proposed Response
		<p>This may help to speed up plan-making. Together with the proposals for Supplementary Plans, it may also help to clarify the relative status of various kinds of planning policy documents. However, this is removing local control in setting policies and arguably making the planning system less democratic. There will also still generally be a local dimension to most issues.</p> <p>There would be a case for NDMPs being presented as a suite of options for authorities to choose from, for potential inclusion in development plans, perhaps with local variations, and with development plans remaining as the principal basis for development management decision-making.</p>
50	What other principles, if any, do you believe should inform the scope of National Development Management Policies?	No comment to make.
51	Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?	These issues could arguably be picked up within Local Plans if they are relevant to the local area. However, a national policy on carbon measurement and reduction may be beneficial due to the technical complexity in preparing such a policy and there would be advantages of having consistency across areas.
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?	No comment to make.

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53	What, if any, planning policies do you think could be included in a new Framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?	No comment to make.
54	How do you think that the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the levelling up agenda?	Providing greater certainty within the planning system may assist. Uncertainty generated through multiple proposed reforms does not assist with supporting economic growth.
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?	Additional funding in relation to masterplanning and on site (including funding for appropriate compulsory purchase) would help to increase development on challenging sites.
56	Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?	Supportive of this change.
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?	No comment to make.
58	We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.	No comment to make.

