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To: The Planning Development Department

Re: Levelling Up and Regeneration Bill: Plan Making Consultation

We welcome the opportunity to comment on the above consultation.

Our detailed comments relating to the questions posed in the consultation document are in Annex 1 to this letter.

As the Minerals and Waste Planning Authority in Oxfordshire, we are responsible for preparing a Minerals and Waste Local Plan, part of the Development Plan for Oxfordshire. This sets out the vision, objectives, spatial planning strategy and policies for meeting development requirements for the supply of minerals and the management of waste within Oxfordshire.

The future preparation of Minerals and Waste Local Plans will need to be in conformity with the new Plan Making reforms when they are introduced.

Within the Officer responses to the Government Questions on the Plan Making Reforms as set out in Annex 1, there are a number of key issues that we would like to highlight. These are:

Transition timeline

Minerals and Waste Plan makers have until **30th June 2025** to submit their Plans for examination and adoption by **31st Dec 2026**. As a Minerals and Waste Planning Authority responsible for the production of the Oxfordshire Minerals and Waste Plan, this would mean that if we failed to meet the current submission and adoption deadline, or our plan were to fail at examination or be withdrawn, we would most likely be required to commence preparation of a new-style plan immediately.

There could be the opportunity to potentially become a front runner starting August 2024, or a first wave Authority in June 2025, though this would need to be explored with DLUC.

Clarity is being sought through the consultation on the consequences of not being identified as a front runner or first wave.

New Plan Making process

The government recognise that current Local Plans take, on average, 7 years. The Bill proposes that all Plans be prepared and adopted in 30 months.

There is a change in plan making process to 3 Gateways, which involve review by independent body (paid for by the Authority). (See Figure 1). One at the start of the Plan making process, one in the middle and the last Gateway just before the Plan is submitted for Examination.

These Gateway stages will review work undertaken, evidence gathered, resources allocated, whilst at the same time also ensuring the plans are compliant with legal and procedural requirements and supporting early resolution to potential soundness issues.

To enable the Plan documents, and supporting evidence, produced as part of the Plan making to progress through the process at pace, we will require a speedier democratic process for sign off. As part of the consultation process, we support the timetable of plan production no longer requiring Full Council sign off and are awaiting further guidance on the proposed governance and delegation arrangements.

It should also be noted that the current requirements for a Local Development Scheme and Statement of Community Involvement requirements will be removed by the Bill.

Digitisation

The aim is for shorter, more visual and interactive, engaging, up to date digital Minerals and Waste Plans, rather than the current word heavy PDF style documents. This will require significant additional skills and resources within the Minerals and Waste Policy Team to develop and maintain.

National Development Management Policies

It is proposed the repetition of policies across all plans will be eliminated in the new system, and plans will be required to be concise and more focused on locally important matters. To assist in achieving this, it intended that a new suite of national development management policies will cover common planning considerations that apply widely in decision-making across different authorities. In response to the consultation, we will be seeking further information on what these will cover.

Standardised data and templates

Government consider that current plans lack standardisation and consistency and are therefore proposing the introduction of data standards and a series of templates, setting out standardised approaches to specific parts of the Plan. Clarity is sought on how these data standards and proposed templates will apply to Minerals and Waste.

It is considered that standardised data and templates would be useful for areas such as site assessments, waste needs requirements, climate impact assessments etc. They could assist in speeding up of the Planning Process, as currently examination of methodologies used for obtaining and analysing data are subject to significant scrutiny and require significant evidence.

Pressure on existing resources

As an Authority responsible for preparing a Minerals and Waste Plan, we need to ensure that we have the right tools and resources to deliver under this new Local Plan Programme from the start, as this will be a key part of the first Gateway Assessment.

A quicker local plan process will require significant internal and external resources to reach the 30-month deadline, including increased skills in digitisation. In addition, it will also require additional funding as Gateway assessments are to be paid for by the Authority along with the final Examination.

Yours faithfully

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**Annex 1
Levelling Up: Plan Making Consultation Questions and Officer Responses**

Question	Officer Response	
Chapter 1: Plan Making	As Plan Making Authority	As a Statutory Consultee on Local Plans
<p>1: Do you agree with the core principles for plan content? Do you think there are other principles that could be included?</p>	<p>Yes.</p> <p>However, the concept of “beauty” is very subjective. Mineral developments will not achieve the status of beauty until the restoration stage. Waste facilities are often unlikely to be considered to provide beauty.</p> <p>Are Government expecting design codes for minerals and waste developments? If so, guidance is sought.</p> <p>The ability to add in locally distinctive policies is welcomed.</p>	<p>National guidance on the content of local plans must make clear the importance of comprehensive evidence and detailed policy in the following areas not identified in the consultation document:</p> <ul style="list-style-type: none"> • Health and well-being, including tackling the wider determinants of health through the built and natural environment by, for example, the promotion of active travel and walkable neighbourhoods and the promoting positive mental health outcomes through the provision of green infrastructure and access to nature. • Tackling health inequality by ensuring local plans highlight spatial inequalities in health and consider the impacts of development on those living with the highest levels of deprivation. <p>Climate mitigation through a full range of measures from energy, housing performance and reducing the need to travel that comprehensively support the Climate Act 2008 budgeting regime.</p> <ul style="list-style-type: none"> • Climate adaptation through the full range of measures necessary to build economic and

		<p>community resilience to flood risk, drought and heat stress.</p> <ul style="list-style-type: none"> • The promotion of social cohesion and equality by ensuring safe civic spaces for all sections of the community. <p>The promotion of civic art and spaces for diverse cultural activities. Plan making reforms August 2023 4</p> <ul style="list-style-type: none"> • The promotion in planning decisions of innovation in genuine public participation through citizens' assemblies and the co-creation of design guides and master plans. • New sustainable technologies are accommodated in energy, housing design, food production and transport.
<p>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>Yes.</p> <p>It is right that the plans should have regard for other authority's documents along with those of other bodies and partnerships.</p> <p>It would be helpful to have some guidance as to what other bodies and partnerships need to be considered, especially for Minerals and Waste.</p>	

	<p>Each corporate or thematic strategies that the Minerals and Waste Plan must link explicitly to will have the potential to slow down overall Plan production.</p> <p>We would expect the user digital template and template exemplars being prepared to also include specific ones for Minerals and Waste Plans, rather than generic ones for Local Plans as a whole.</p>	
3: Do you agree with the proposed framework for local development management policies?	Yes, in principle, but it will depend on the contents of the National Development Management Policies.	
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>To a point they would.</p> <p>What is aimed at providing standardisation could lead to mundane plans that do not reflect local distinctiveness. It will be safer to go through the template as though it is a checklist rather than to apply innovation to the plan making process, particularly given the timeframe of 30 months. It would therefore make it easier to prepare standard plans that lack both local distinctiveness and innovation.</p>	
5: Do you think templates for new style minerals and waste plans would need to	If this templates approach is introduced, Minerals and Waste Plans should have their own specific templates. This may introduce its own issues, as every Authority has different mineral and waste	

<p>differ from local plans? If so, how?</p>	<p>resources, opportunities and constraints. This needs to be reflected in Plans.</p> <p>But without seeing the templates, or the final regulations it is not possible to be sure. The templates should bear in mind the long-term nature of mineral developments and their temporary nature. Waste facilities are comparable to industrial developments and fewer changes to the templates might be necessary.</p> <p>Exemplars would be useful.</p>	
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Chapter 2: The new 30-month timeframe

Question	As Plan Making Authority	As a Statutory Consultee on Local Plans
<p>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>From a MW Policy point of view the decision to adopt the local plan within 30 months is a political decision born from the desire to have more up to date plans. Planning Authorities will have to do what they can to achieve that timetable.</p> <p>Although we have no argument with the timetable in principle on policy grounds, the resourcing of planning teams, including planning policy teams, does cause issues for many authorities, including Oxfordshire.</p> <p>Also, Authorities internal sign off processes for the Gateways and timetables needed for this may impact on the 30-month deadline.</p> <p>What would be the consequences of not producing a plan within 30 months, and what measures would the government put in place to ease the resource issues of planning departments?</p> <p>Please also note the limitations on wildlife and biodiversity surveying period 'windows' for applicants, the LPA's specialist teams and the statutory consultees. There's an argument that the 30-month approach could have an extension to cover off this issue.</p>	<p>No, the limitations on wildlife and biodiversity surveying period 'windows' for applicants, the LPA's specialist teams and the statutory consultees. There's an argument that the 30-month approach could have an extension to cover off this issue.</p>
<p>7: Do you agree that a Project Initiation Document will help define the scope of the plan and be a useful</p>	<p>It might be helpful in providing standardisation when viewing plans. It would depend very much on what the template for the PID required.</p>	<p>Yes</p>

tool throughout the plan making process?	Whilst it is not proposed to place a time limit on the early participation stage, what would be considered a “certain point”?	
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Chapter 3: Digital plans		
Question	As Plan Making Authority	As a Statutory Consultee on Local Plans
8: What information produced during plan-making do you think would most benefit from data standardisation, and/or being openly published	<p>The GIS information could be standardised, but there would need to be some flexibility in the way it is presented. For example, a set scale might be very different for a county compared to an urban borough.</p> <p>Some standardisation of the data relating to the self-sufficiency of an authority would be helpful so that it could be seen how much reliance was placed on neighbouring authorities or even those farther afield. In other words, information related to the sustainability issues.</p> <p>Whilst the pressure is on for Local Plans to digitise data and for data standardisation, it would also be beneficial if nationally produced documents, such as the Aggregates Minerals Survey, were produced on a similar basis, rather than just a PDF. Digital, publicly digestible, GIS based reports would speed up the interpretation of findings and provide a standardisation, which in turn would make plan making easier. Waste Data from the EA could also be produced in this way.</p> <p>There is a need to ensure that any templates, digitisation and data requirements produced, and software utilised for the Plan making process are already accessible by Local Authorities and not add additional cost to Councils.</p>	
9: Do you recognise and agree that these are some of the challenges faced as part of plan preparation which could benefit from	<p>Yes, there are lots of avenues for challenge from both developers and the local communities which makes the evidence gathering time consuming and at high risk of failure at the latter stage of the process.</p> <p>It is more challenging to get community and stakeholder</p>	

<p>digitalisation? Are there any others you would like to add and tell us about?</p>	<p>engagement at the start of the Plan making process as engagement tends to be greater once sites are proposed.</p> <p>Digitisation is not a panacea to solving lack of engagement, but it could be a useful tool.</p> <p>The adopted Local Plan in digital format does not go out of date any slower than an adopted plan in PDF or paper-based format, but it might be easier for the public to navigate.</p>	
<p>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?</p>	<p>Yes.</p> <p>With Minerals particularly there would be an opportunity to build a picture of the long-term benefits of restoration over time.</p>	
<p>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?</p>	<p>Online storyboarding would be helpful in explaining to the public how sites came to be chosen, and the processes that the selection had to go through.</p> <p>Future Planning courses should include digitisation, GIS and technology as key modules, to ensure that the right skills are available.</p>	

Chapter 4: The Local Plan timetable		
Question	As Plan Making Authority	As a Statutory Consultee on Local Plans
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?	<p>Simplifying the plan timetable would be beneficial to the authority and to the readers of the timetable.</p> <p>Support the timetables no longer requiring Full Council sign off and await the guidance for the governance and delegation arrangements.</p>	
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?	It would be sensible that the timetable was updated each time a gateway has been achieved.	

Chapter 5: Evidence and the tests of soundness		
	As Plan Making Authority	As a Statutory Consultee on Local plans
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?		Yes – it appears the direction of travel will give more clarity.
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?	<p>No, not for designated landscapes and protected wildlife/biodiversity sites and impact areas</p> <p>From a M&W Policy view Yes. The standardisation of site assessment methodologies may be beneficial, as an Authority who receives significant site nominations, the site assessment process, including methodology creation, site evidence gathering, assessment and selection can take significant time and resources.</p> <p>Waste Needs Assessments could also be standardised using easily accessible data.</p> <p>In addition, production of standardised templates for impact assessments such as climate, health, transport etc may also save significant time and resources in the Plan production.</p>	<p>There is a need for clear guidance on what is required in relation to transport modelling evidence.</p> <p>This is especially true for two tier authorities where the planning authority is separate to the highway authority.</p> <p>No, not for designated landscapes and protected wildlife/biodiversity sites and impact areas</p>

<p>16: Do you support the freezing of data or evidence at certain points of the process? If so which approach(es) do you favour?</p>	<p>There is a case for freezing data at a point in time so that the evidence can be prepared and examined by everyone.</p> <p>Unfortunately, the proposals sound unclear, and the freezing of evidence would just be guidance. This would cause its own issues.</p> <p>The problem with not freezing evidence is that decisions such as the number of facilities required would be based on such evidence, and if it changes over time, it could undermine the whole direction of the plan. The evidence would therefore be constantly shifting and be under scrutiny, potentially requiring new additional evidence, which in turn slows down the process.</p> <p>If the gateways cannot fix evidence that will be considered later at the Examination, the purpose of the gateways become less clear. They appear to be an additional hoop that will be reconsidered at the Examination in any event. This would slow the process rather than speeding it up.</p>	<p>Yes – agreeing the scope of evidence or methodology is critical</p>
<p>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?</p>	<p>If the approach is to change from “submit such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan” to ‘submit only such supporting documents as the planning authority considers strictly necessary to show whether the plan is sound’, a list of documents ‘required’ for soundness with the option of adding additional evidence if it was felt necessary would be helpful in the reforms.</p> <p>However, Paragraph 100 goes on to say that it will not prevent planning authorities publishing wider materials or the Inspector from requesting additional evidence. Therefore, we are unsure how this will speed up the</p>	<p>This requires clear guidance.</p> <p>‘When implementing the plan-making reforms, we are proposing a requirement to submit only such supporting documents <u>as the planning authority considers strictly necessary</u> to show whether the plan is sound’ the underlined text means there is ambiguity and one planning authority may decide something is necessary and another may not. Who challenges what is necessary and what is not if it</p>

	planning process as the Authorities will have to produce everything anyway.	isn't stated what is expected and discretion is given?
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Chapter 6: Gateway assessments during plan making		
Questions	As Plan Making Authority	As a Statutory Consultee on Local Plans
<p>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?</p>	<p>Whilst we acknowledge the gateways are advisory, if an Authority or a Stakeholder disagrees with the findings of the person appointed to undertake the gateway assessment, what are the consequences?</p> <p>In addition, what are the consequences if advised to do something at a gateway stage is then found unsound at a later Gateway/ Examination?</p>	
<p>19: Do you agree with these proposals around the frequency and timing of gateways and who is responsible?</p>	<p>It is difficult to know whether the timescales will be achievable without knowing what the precise requirements of plan making will be.</p>	
<p>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?</p>	<p>In principle the gateways are a good idea, but details do raise some concerns. In addition to those already raised there might be concern from stakeholders that things are being agreed behind closed doors at gateway sessions. We appreciate that these are not to be considered as quasi examinations, but they must carry some weight if they are to be meaningful.</p> <p>Could Gateway 1 also consider the methodologies for assessments to be used within the Plan making process (if Standardised templates for thus evidence has not been provided). Such as Waste Needs Assessment, Mineral Assumptions etc as well Climate, Health and Transport?</p>	

	<p>Assessors of Minerals and Waste Plans should have working knowledge of the preparation of similar scale Minerals and Waste Local plan preparation.</p>	
<p>21: Do you agree with our proposal to charge planning authorities for gateway assessments?</p>	<p>Potential costs for gateway assessments have not been suggested so it is difficult to provide a full answer, but each assessment is to be at least 4 weeks duration. This could cost Authorities significant amounts.</p> <p>Making the gateways mandatory and then recovering the cost from planning authorities appears to be increasing central government control on planning and making local authorities pay for it.</p> <p>Charging Local Authorities for mandatory assessments would put additional pressure on the finances of already over stretched and under resourced planning authorities.</p> <p>This could potentially be mitigated by having an increase in planning fees with guidance that a proportion of the planning fee should be given to the policy making element of the planning authority.</p> <p>It would be expected that the fees for the gateway process would be significantly less than the cost of a failed examination.</p>	

Chapter 7: Plan Examination		
Questions	As a Plan Making Authority	As a Statutory Consultee on Local Plans
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?	If an Inspector was appointed at any of the first two Gateway stages, it would be more efficient for that same Inspector to undertake Gateway 3 and the Examination, as they would know the Plan already.	Yes – but again clear guidance is needed as to what a ‘short statement’ is for third parties. It should set out a maximum length / word count including appendices.
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?	Provided that the gateways pick up significant issues with the plan at an early stage, six months should be long enough to pick up anything that arises late in the plan process.	

Chapter 8: Community engagement and consultation		
Questions	As a Plan Making Authority	As a Statutory Consultee on Local Plans
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?	<p>The PID may or may not be the right place for it, but the movement of the commitments in the SCI to a document produced within the plan making process would be easier to understand for the general public.</p> <p>The SCI does cover elements outside the plan making process, so these could be lost if the SCI is no longer required</p>	
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?	<p>Yes, because the 30 month timeframe is very tight, so this will allow interested parties and statutory stakeholders the time to sufficiently resource the consultations when it is produced.</p> <p>It will also reduce the assertion from stakeholders that they have limited time to comment.</p>	
26: Should early participation inform the Project Initiation Document? What sorts of approaches might help to facilitate positive early participation in plan-preparation?	<p>Any early participation would be beneficial to inform the PID. However, from experience, early consultation generally draws very little response; it tends to be once the sites are proposed that stakeholders get involved, because they can see how the proposals would affect them. At that latter part of the process, they tend to question how earlier parts of the process were carried out.</p> <p>Production of non-technical summary or similar would help non-specialists.</p> <p>A limitation of file size would help people with poor broadband.</p>	

	Standardised/logical file naming would help everyone to navigate files.	
27: Do you agree with our proposal to define more clearly what the role and purpose of the two mandatory consultation windows should be?	Yes. Although it does lose the flexibility to make changes to the proposed plan following consultation, but prior to consulting on the submission document	
28: Do you agree with our proposal to use templates to guide the form in which representations are submitted?	<p>So long as there is flexibility to comment outside of the template parameters when needed.</p> <p>From an M&W point of view, in principle it sounds like a good approach, but it might lead to lengthy templates that are all things to all plans. This might make them off putting to some members of the public.</p> <p>Compulsory use of digital templates by statutory bodies to respond to local plans may be beneficial and save significant time and resources as often these responses can be lengthy and time consuming to interpret by both officers and communities.</p>	

Chapter 9: Requirement to assist with certain plan-making		
Questions	As a Plan Making Authority	As a Statutory Consultee on Local Plans
29: Do you have any comments on the proposed list of prescribed public bodies?	We would need to consult the Ministry of Defence for airport safeguarding near military air bases.	Integrated Care Boards are identified as a statutory consultee but their focus will primarily be on NHS services and the impact of Local Plans on their capacity. Directors of Public Health should also be a statutory consultee as public health looks at how the wider determinants of health such as housing, the built environment, access to green space can impact on the population's health and wellbeing. Improving health is a key objective of planning and it requires wider public health input not just from the NHS.
30: Do you agree with the proposed approach? If not, please comment on whether the alternative approach or another approach is preferable and why.	It appears that in practice the requirement to assist would exist, but only if information is requested by the planning authority. This would make it more reactive and less proactive from the public bodies.	Clear guidance is required on what assisting looks like. Is there an expectation that the public bodies are expected to produce evidence at their expense? Or is it that they assist with the production of evidence, but any cost of evidence production is paid for by the planning authority?

Chapter 10: Monitoring of plans		
Questions	As a Plan Making Authority	As a Statutory Consultee on Local Plans
31: Do you agree with the proposed requirements for monitoring?	The division of those elements which need annual monitoring, and those required every four years is helpful.	It would be helpful to have a consistent range of metrics, but consideration should be given to the resources required to collect and publish monitoring data.
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?	<p>The requirement for monitoring should be split between those Authorities responsible for Local Plans and those responsible for Minerals and Waste Plan.</p> <p>As currently set out Minerals and Waste Plan Authorities would be required to include the monitoring of housing and employment, both of which are not included in Minerals and Waste Plans.</p> <p>What are the repercussions of not submitting the metrics on time?</p> <p>The production of the metrics is often dependent on other agency data released For example: "Waste generated" details are reliant upon data from the Environment Agency being released. This is not usually until the September the following year. This is then fed into further work on management methods and capacity. This would cause resource issues if this metric was required in short timescale from the release of the data.</p>	<p>Planning metrics should also include metrics on health and wellbeing as this is a key objective of the planning process. For example, standardised measures of wellbeing exist and could be included.</p> <p>Health & wellbeing should also be weighted for areas of multiple deprivation in order to focus benefits for areas and people in most need across an LPA's area</p>

Chapter 11: Supplementary plans		
Questions	As a Plan Making authority	As a Statutory Consultee on Local Plans
33: Do you agree with the suggested factors which could be taken into consideration when assessing whether two or more sites are 'nearby' to each other? Are there any other factors that would indicate whether two or more sites are 'nearby' to each other?	Determining whether two sites are "near" to each other would cause a great deal of debate. The more that can be done to clarify that in guidance the better. This should also take into account what use would be put on the site and the scale of the operation.	How would this be approached if there is a major barrier or environmental designation? You could have two site right next to each other so would be nearby but if one is an AONB and the other not they can't simply be interchangeable. This is also true of access to the transport network. You could have two sites near each other separate by a river or railway line, one with good access to amenities and one with poor access. Access to amenities would be a good factor. This should be done using real route not concentric circle – as concentric circles do not give a true reflection of accessibility.
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.		

<p>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?</p>	<p>Sites are often the most controversial aspect in the Plan making process. If an additional site is the reason for the supplementary plan, local communities might feel it is unfair that they only have one opportunity to raise issues about the site that affects them.</p>	
<p>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.</p>	<p>It is generally best to have clear thresholds for processes to avoid confusion.</p>	
<p>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</p>		

regulatory measures would ensure this?		
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Chapter 12: Minerals and Waste Plans

Questions	As a Plan Making Authority	As a Statutory Consultee on Local Plans
<p>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?</p>	<p>Yes, the limitations on wildlife and biodiversity surveying period ‘windows’ for applicants, the LPA’s specialist teams and the statutory consultees. There’s an argument that the 30-month approach could have an extension to cover off this issue.</p> <p>From a M&W point of view minerals sites particularly have a long lifespan for implementation. A quarry might typically be worked for 10 years. This means that they are very sensitive issues with significant involvement from local communities. This means there is significant evidence required for choosing the sites to be allocated. For a mineral rich county this can mean a large number of sites to be assessed. The short timescale for assessing those sites will put a lot of pressure, not only on the planning teams, but also the consultees to that process.</p> <p>Minerals and waste are strategic cross boundary issues which is recognised in paragraph 210, as minerals can only be dug where they exist, and waste can only be treated where such facilities exist. However, this doesn’t necessarily mean two Authorities will create a joint Plan. How this issue and the information and evidence required to assess these movements at Gateway and Examination stage will need to be established and clarified in the new plan making system.</p>	<p>Yes, the limitations on wildlife and biodiversity surveying period ‘windows’ for applicants, the LPA’s specialist teams and the statutory consultees. There’s an argument that the 30-month approach could have an extension to cover off this issue.</p>

Chapter 13: Community Land Auctions		
Questions	As a Plan Making Authority	As a Statutory Consultee on Local Plans
39: Do you have any views on how we envisage the Community Land Auctions process would operate?	N/A	
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?	N/A	

Chapter 14: Approach to roll out and transition

Questions	As a Plan Making Authority	As a Statutory Consultee on Local Plans
41: Which of these options should be implemented, and why? Are there any alternative options that we should be considering?	<p>One option to consider might be to stagger the deadlines for the submission of different plan types so that not all are submitted at once.</p> <p>The option to start work on the new style plans earlier is helpful.</p> <p>Clarity is sought on what would happen to those authorities that don't have an up-to-date plan, are unable to meet the current system timetable and are not identified as a front runner or first wave.</p>	

Chapter 15: Saving existing plans and planning documents		
Questions	As a Plan Making Authority	As a Statutory Consultee on Local Plans
42: Do you agree with our proposals for saving existing plans and planning documents? If not, why?	Yes.	

Equalities impact		
Questions	As a Plan Making Authority	As a Statutory Consultee on Local Plans
<p>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?</p> <p>Please provide a free text response to explain your answer where necessary. Is there anything that could be done to mitigate any impacts identified?</p>	<p>Moving to a more online interactive approach, if done well, could be much easier to be navigated by more people. An example of this would be that a consultation online might be easier to navigate than PDFs.</p> <p>There are also additional issues such as whether websites are accessible.</p>	<p>The proposals need to consider their impact on not just those people with protected characteristics but also consider the impact on people experiencing other inequalities, such as those linked to geography such as rural isolation, and those people who experience health inequalities associated with long term conditions</p>