

2 March 2023

Sent by Email to PlanningPolicyConsultation@levellingup.gov.uk

SLCC Response to Consultation on Levelling up and Regeneration Bill: Reforms to National Planning policy

Thank you for giving the Society of Local Council Clerks the opportunity to comment on this important consultation document.

The Society of Local Council Clerks is the professional body representing town and parish council clerks in England and Wales. More than 4,000 local council clerks are in membership serving over 6,000 town and parish councils throughout England and Wales. Influencing, shaping and guiding the planning system is a high priority for many of our members. This issue is, therefore, of special significance and importance to the Society and its members.

In formulating this response, we have consulted widely with our members. We have also urged them to respond individually.

We have concentrated on those questions that are of the greatest relevance and significance to the sector. Taking each question in turn.

Q.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?

Yes. We have general sympathy with any proposal that would make planning policy simpler, quicker, more certain and give communities greater control and say over development.

Q.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)?

Again as with 1. We have general sympathy with any proposal that would make planning policy simpler, quicker, more certain and give communities greater control and say over development. Further, it is not fair that local planning authorities that 'over deliver' their housing requirements early in the plan period are penalised.

Q.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?

Yes, but this should be obligatory bar in exceptional circumstances. It should explicitly include windfall sites of all sizes into consideration.

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

We have no strong views on this question.

Q.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?

We are strongly in favour of boosting the status of neighbourhood plans particularly the potential changes to paragraph 14 by ensuring neighbourhood plan policies remain valid for at least 5 years - not 2 years - where there is less than 5 years of housing land supply in the local authority overall. The changes will provide for significant and much needed additional layers of protection for neighbourhood plans from speculative development that is not supported or required by the local community. They are something that the SLCC and many others have long called for. They will also provide greater confidence and certainty to groups preparing, or considering preparing, a neighbourhood plan. Local councils have been at the forefront of the development of neighbourhood plans.

Q.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. In particular, it is vital that any development is integrated with local infrastructure.

Q.7: What are your views on the implications these changes may have on plan-making and housing supply? They are unlikely to have a significant implication on plan making and housing supply.

These changes appear sensible and should increase the appropriateness of developments.

Q.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?

Yes. It is important that national policy and guidance is as clear as possible about what constitutes exceptional circumstances in order to minimise uncertainty and scope for different interpretations. Great clarity is always advisable.

Q.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. This should provide for more certainty in plan making. This lack of certainty can be a barrier to the preparation of development plans, including neighbourhood plans. Further, the requirements to build at higher densities can often lead to out-of-character and generally poorer developments.

Q.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.

We have no strong views on this question.

Q.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?

We have mixed views about this. We are supportive of measures that will simplify and speed up plan-making, and generally make the evidence requirements 'less bulky'. In particular as the current experience of local councils and communities in general in plan-making, especially the preparation of local plans, is at best mixed and for many not a positive one. Most simply do not have the time and resources to effectively engage in the process. However, the removal of this requirement should be not at the expense of, or undermine, community engagement and control. It should be made explicit that one of the purposes (and success measures) of the changes is to achieve greater levels of community engagement in plan-making.

Further, we would also urge that the emphasis in paragraph 24 of the existing NPPF on the need to co-op across administrative boundaries applies equally across national boundaries. Along the Wales-England border, for example, communities strongly influence and depend on each other – economically, socially and environmentally. In our view, planning authorities should have an equal or arguably a stronger duty to co-operate across that border when setting or implementing policy.

Q.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?

We have no strong views on this question.

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

We have no strong views on this question.

Q.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?

We have no strong views on this question.

Q.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 have no strong views on this question.

Q.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?

We have no strong views on this question.

Q.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?

We have no strong views on this question.

Q.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?

We have no strong views on this question.

Q.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?

We have no strong views on this question.

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

Yes. Deliverable should mean firmly committed to delivery, approved and timetabled.

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

We have no strong views on this question.

Q.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?

Yes, the Society is generally supportive of any measures that add more weight in the planning system to the provision of genuinely affordable homes, be it for rent or sale, amongst other affordable housing options.

In terms of specific suggestions, we generally do not consider, however, that the proposals may not go far enough to fully support the provision of social rent housing through the planning system. There are practical barriers that need to be addressed as well as policy ones. For example, groups wishing to deliver social rent affordable housing schemes should have full and equal access to Government support programmes as available to other forms of affordable housing provision such as for sale.

Also, giving communities greater flexibility and discretion over the type and tenure of affordable housing to be provided in housing development based on local need and circumstances. This could include the removal in the clause contained in the NPPF that at least 10% of homes in major housing schemes be available for home ownership.

Q.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. Within an ageing population, the provision of such housing will be increasingly important. Consideration should also be given to strengthening this by making specific reference to the need to prioritise certain types of older people's housing in development where there is local justification and support to do this. For example, extra care accommodation or similar. Also, making specific reference to, and general support for, Building for Life Standards in new housing developments.

Q.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)?

We do not consider that the existing policy has been that effective, especially as the vast majority of housing continues to be done by major developers on large sites. Perhaps a target of 20% or 30% smaller sites would

be better. Wording should ensure that these are, in fact, smaller sites for smaller builders, not just subdivided large sites.

We note the prospectus makes several references to the importance of encouraging smaller sites in urban areas. It should be noted that small sites are equally important in rural locations. Indeed, in many rural areas small scale development is the most sustainable and appropriate form of development.

We would not support any changes in permitted development rights in support of this aim.

Q.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?

We consider that Government planning policy and associated guidance should be explicit that even the smallest sites will contribute to the overall housing delivery target/provision required as part of a neighbourhood plan or local plan. Also, perhaps consideration should be given to reducing the number at which a site is considered large.

Q.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. We strongly support this. The current narrow definition acts as a barrier to local councils and others to progress affordable housing projects.

Across the country, local councils have supported and been a key partner in delivering **small scale rural affordable housing developments**.

We would urge that specific mention should be made to local councils in addition to community-led developers, more generally, and almshouses. This would reflect and articulate their key and growing role in delivering affordable housing.

Q.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?

Yes. We would urge the Government review the statement at footnote 7 that ‘entry-level exception sites should not be permitted in National Parks (or within the Broads Authority), Areas of Outstanding Natural Beauty or land designated as Green Belt’. There may be exceptional circumstances in such areas where the provision of entry level exception sites may be acceptable, for example, where it is the only way in which a local affordable housing need can be met sustainably and appropriately. We consider that there should be greater flexibility to enable communities the opportunity to bring forward entry level exception sites in Areas of Outstanding National Beauty, Green Belt and with less certainty in National Parks where there are clear exceptional circumstances and community support.

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

We have no strong views on this question.

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

It should provide for greater certainty over the allocation of homes, especially affordable. In particular, in respect of the ability to prioritise applicants with a strong local connection, where there is local evidence and support for this.

We especially consider that it should be much easier for local councils and other community groups to prepare local lettings policies, including as part of a neighbourhood plan. It should also be more difficult for a local authority to deviate from a Local Letting Policy, once approved.

Our experience is that this lack of certainty over the allocation of homes provided through community-led housing developments often is a barrier to many groups wishing to support and bring forward community-led (including affordable) developments.

Q.30: Do you agree in principle that an applicant's past behaviour should be taken into account into decision making? If yes, what past behaviour should be in scope?

Yes. It is right and proper that if an applicant has a history of say flouting or failing to abide by planning rules and regulations this should be taken into account in planning decision making. That such wilful past behaviours rarely can be taken into account is a source of frustration and often incredulity of local councils.

In terms of the scope we have no strong views on this.

Q.31: Of the 2 options above, what would be the most effective mechanism? Are there any alternative mechanisms?

Of the two options, we generally consider that of the two, one would be the most effective and practical.

In terms of alternative mechanisms, we would urge that greater use should be made of Building Controls reports identifying low quality standards and non-compliance.

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

Yes, we agree that the 3 build out policy measures will help incentivise developers to build out more quickly. We support these and any other measures aimed at helping incentivise developers to build out more quickly. This includes the introduction of fines and other sanctions on developers 'land banking'.

Q.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?

Yes. It is noted, however, that the word 'beautiful' is subjective and open to interpretation. One person's beauty is another's ugliness. To be fully effective and aid its practical application, thought should be given to providing guidance on what is meant by beautiful, perhaps as part of the Glossary of Terms which forms part of the NPPF.

Q.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?

Yes, but also see our comments to q.33. about the need to expand on what is meant by beautiful.

We would like to add that greater emphasis on design to be achieved will also require a general upskilling in design skills especially designers used by developers and in planning authorities negotiating with them as well as local communities.

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

We have no strong views on this question.

Q.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?

No. We do not consider that the specific mention to mansard roofs to be helpful. Indeed, we are quite surprised by proposed specific mention to it and the significance attached to mansard roofs. Mansard roofs are uncommon in most of England with the exception of a few city centres and other locations and building types, e.g. country houses. They may be appropriate in some cases, but not generally. If the Government wishes to encourage them, this is best done through planning guidance rather than planning policy.

Q.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?

We are generally supportive of any appropriate intervention (large and small) aimed at protecting the environment and tackling climate change. We fully agree that leaving the environment in a better state and tackling climate change are two of the greatest long-term challenges facing the world today. Local councils have a key and growing role to play here.

With regard to the specific interventions mentioned, we especially welcome and support the reference to the need to prevent developers or landowners clearing sites before applying for planning permission. This is a source of frustration and anger to many members who have had direct experience of this happening in their local area.

We also strongly support the proposals aimed at curbing the use of artificial grass. While we recognise there are some environmental benefits with its use, these, by a wide margin, do not outweigh its disbenefits.

In wider terms, perhaps developers should be asked to respond to more stringent questions around impacts on wildlife and habitats.

Finally, we welcome the commitment to work with DEFRA to introduce actions to prevent this, however, we urge that this be done speedily and as a priority.

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

Yes. We strongly support the protection of agricultural land for food production, especially considering global insecurities and the need to promote sustainable development. Often there still seems to be a presumption in favour of development even on "best and most versatile" farming land, despite the fact that we currently import 50% of our food. Farming land is being gradually taken up by housing and other forms of development such as energy production.

The consultation mentions the independent Food Strategy report which is welcomed, but it should be noted that it carries much more detailed recommendations than those mentioned.

Q.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?

We have no strong views on this.

Q.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?

We are generally supportive of any appropriate measures that support climate change adaptation further, including changes to the NPPF and associated guidance.

In terms of specific areas that planning policy could support climate changes adaptation further solar panels especially in car parks, wildlife corridors, grey water use and more urban tree planting all immediately come to mind. Also, more could be to address the facilitate and simplify the planning process for smaller-scale local projects initiated by both local councils on behalf of their communities and also by local individuals, including local landowners and farmers, investing in their own projects within their communities.

Also, it is our experience that large but sometimes small developments are often generally planted with low cost non-native shrubs and trees, rather than a diverse planting scheme which would attract diverse wildlife and improve the biodiversity of the development.

Further, explicit reference in the NPPF or associated guidance should be made to the important and strategic role of local councils, however small, in making a reality of a more localised approach to climate change mitigation by means of initiating much smaller-scale energy schemes than the bill currently envisages.

We also note there is also no specific mention of the use of renewable materials or emphasis on reducing waste from developments, both of which should be important planning considerations.

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

While we have no strong views on the question. While we are fully supportive that the planning system should help increase the use and supply of renewables, but this should not, however, be at the expense of, and work with the grain of, local decision making and democratic and consultation processes. If the

The Society of Local Council Clerks is a company limited by guarantee, registered in England and Wales with company registration number 10566132.

Registered Office, Suite 2.01, Collar Factory, 112 St Augustine Street, Taunton, Somerset, TA1 1QN Tel 01823 253646

Government is minded to make the changes, this requires careful handling to avoid some of the tensions associated with the previous policy.

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

We have mixed views on this. The development of renewable and low carbon technology is often a contentious issue. It is critical, therefore, that any application for such development, including the repowering and life-extension of existing renewables sites is not at the expense of local decision making and democratic and consultation processes. Local councils and communities, more generally, must be at the heart of decision making for renewable and low carbon technology as well as their implementation

While we welcome the reference to only approving an application for the repowering and life-extension of existing renewables sites, where its impacts are or can be made acceptable, we would welcome greater clarity on what this means in practice. Many of the terms are uncertain and open to interpretation. What is meant by community-led? How the potential impacts and outcomes will be assessed and mitigated? Also, how the affected communities, including local councils, will have the opportunity to comment and be involved in the decision-making process. Greater clarity is sought.

Q.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?

We have mixed views.

While there is much that we welcome and support in the prospectus and footnotes 54 and 62, specifically the:

- reference in the prospectus to that local communities must be at the heart of decision making for onshore wind.
- reference in the footnotes that to make a proposal acceptable in planning terms it must address the planning impacts identified by the local community.

We are concerned and do not support that areas identified as suitable for wind energy development can be done via a Supplementary Planning Document or similar. *Supplementary Planning Documents are not normally associated with nor designed for making land-use allocations, especially controversial types of development, as is the case here.* Their main role is to build upon and provide more detailed advice on policies in an adopted development plan. In view of the contentious nature of wind energy development and its potential impact on the environment and local communities, it is critical that the impacts of proposals are fully assessed and considered, and that *local communities, including local councils, should be able to fully participate on where this type of development takes place. This, we urge, can only be satisfactorily done through the development plan process.*

Furthermore, it is not clear from the footnote whether the use of Supplementary Planning Documents in this respect will only be permitted where there is an over-arching supporting policy contained in the development plan. If the intention is that they can be introduced in the absence of supporting policy contained in an approved development plan, we would be strongly opposed to this.

The Society of Local Council Clerks is a company limited by guarantee, registered in England and Wales with company registration number 10566132.

Registered Office, Suite 2.01, Collar Factory, 112 St Augustine Street, Taunton, Somerset, TA1 1QN Tel 01823 253646

We note that the prospectus makes reference to updated Government guidance on community engagement aimed at the on-shore wind development industry. We welcome any measures aimed at ensuring that host communities can fully participate and benefit from onshore wind energy. It also makes reference to further guidance. As you will be aware, this is of special interest to local councils and we would welcome the opportunity to meet or speak with officials to discuss in more detail how we can input into this further guidance as well as the practical application of the guidance contained in the prospectus.

Q.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. However, we consider that it is too narrow in scope, particularly the focus on adaption of existing buildings to improve energy performance. As the Net Zero Review and many other authoritative commentaries have pointed out, adaption of our existing building stock to improve energy efficiency is a key priority in mitigating climate change. It is our experience that national and local planning policies often inhibit this, particularly when it relates to proposals affecting Listed Buildings or in Conservation Areas, National Parks and Areas of Outstanding Natural Beauty. There are also other technologies that are important to the environment and addressing climate change, which households are others sometimes face practical planning barriers when seeking to install. Electrical Vehicle Charging points just to name just one good example.

It is also proposed to address this change through a new paragraph (161) in Chapter 14, but the link to the Chapter 16 Conserving and Enhancing the Historic Environment clauses finds no matching changes there. This we consider is an over-sight. For the avoidance of doubt and to avoid any tensions downstream, we consider that similar changes should be made to Chapter 16 of the NPPF.

Q.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?

We have no strong views on this question.

Q.46: Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

We have no strong views on this question.

Q.47: Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

We are generally supportive of the introduction of clear timelines and transitional arrangements for preparing neighbourhood plans. This should provide certainty for neighbourhood planning groups both preparing or considering preparing a neighbourhood plan and help against speculative planning applications coming forward in areas that have a made neighbourhood plan under the current system after the reformed system is introduced.

Flexibility should be built into the proposed timetable to allow for any delays in its implementation.

Q.48: Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

No. We strongly oppose the removal of Supplementary Planning Documents. They are an important, proven and relatively simple to prepare planning tool providing detailed guidance on the application of local policies in the local area.

They are especially important to local councils, who have often played a key role in their preparation and implementation. Indeed, there are many examples of ones that have been prepared by local councils, especially village design statements.

We do not consider the proposal to replace them with Supplementary Plans to be practical or desirable. Especially as Supplementary Plans, it appears, will take longer and be more resource intensive to prepare.

There is a need for local planning authorities and local communities to have the ability to prepare, relatively easily and quickly, planning documents like Supplementary Planning Documents to respond to changing circumstances and provide local detail.

The proposal also seems to be at odds with one of the main aims of the reforms, which is to put communities at the heart of the planning system, as it will hinder their ability to do so.

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

We do not support this. While we recognise that there may be some operational benefits such as reducing duplication and making it easier to produce planning documents, we do not consider that these outweigh, by a wide margin, the disbenefits.

They are too centralised, broad brush and top-down to be truly effective and responsive. There is a serious risk that they will undermine local control and participation in the planning system and the scope for local innovation and responsiveness. The proposals also seem at odds with the Government's stated aim of the planning reforms which is 'put communities at the heart of the planning system'.

Should the Government be minded to introduce them, we urge that they should be restricted to a small number of themes which are already the subject of detailed national policy or guidance, or where national consistency is important. We also strongly urge that the unnecessary and unhelpful assumption that where there is conflict between two NDMP policies will generally trump local planning policies be reconsidered and ideally removed.

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

We have no strong views on this question.

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

We have no strong views on this question.

Q.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?

We have no strong views on this question.

Q. 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?

Policies to enable greater protection of existing employment areas and buildings (including farm buildings), including suspension of existing permitted development rights to convert such buildings to housing. Also, strengthening the enforcement system and policies that would give more weight in the planning system to the cumulative impact, especially large developments. Further, greater controls over the operation of construction sites, including making it easier to introduce and enforce conditions to make the development more enduring for neighbours.

In addition, strengthening Green Belt specifically in a few important respects. The agricultural buildings exception should include the caveat of “whilst preserving the openness of the Green Belt”, or something similar, as otherwise it facilitates uncontrolled development of agricultural buildings on the Green Belt including through permitted development. Also, its role in providing access to outdoor environment for health and recreational purposes should be enhanced. The Green Belt is not just about preventing or preserving but also about enabling wellbeing. Further, there be greater emphasis on creating mixed and balanced communities. There is a pressing need to ensure that the Green Belt does not become the preserve of the wealthy especially where housing and jobs are concerned.

Q.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?

We have no strong views on this question.

Q.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?

We have mixed views on this question. We support and consider more could be done to increase development on brownfield land within city and town centres and more generally. In particular, in addressing the abnormal costs and other, often complex, issues associated with the historic use of brownfield sites. Not only is this a major barrier to local authorities and developers, but also local councils and communities more generally wishing to develop such sites. However, we are unsure of why it was necessary to link this question with city and town centres or with a view to facilitating gentle densification on our urban cores. While increasing development on brownfield sites may be a particular hurdle in city and town centres, it is not exclusively to them, many villages and rural areas experience similar issues.

In terms of suggestions, one might be to amend national policy to include a clear brownfield land first statement in national policy.

We would not support any changes in permitted development rights in support of this aim.

Q.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?

Yes, we would support this.

Thank you again for the opportunity to comment upon this important document. If it would be helpful, the Society will be pleased to meet with or speak to officials to explain in more detail its points and observations over this issue.

Yours sincerely,

Rob Smith

Chief Executive

Society of Local Council Clerks