



February 2023

By email to: PlanningPolicyConsultation@levellingup.gov.uk

Levelling Up & Regeneration Bill – Reforms to National Planning Policy - Need Not Greed Oxfordshire response, February 2023

Need Not Greed Oxfordshire (NNGO) is a coalition of 36 groups from across the county, together representing thousands of community members. Our campaign is committed to:

- A restoration of planning principles, with a proper balancing of economic, environmental and social considerations;**
- Local democracy, with planning control in the hands of locally elected and accountable representatives; and**
- Environment and rural sustainability, ensuring that our landscape, nature and rural communities are at the heart of decision-making.**

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

YES

This is a damaging and pointless piece of regulation that undermines local faith in planning.

Local Authorities can't generally control the land supply as they don't own the land and may not have house building skills. If the test is failed and the presumption in favour of sustainable development applies, agreed local policies can be ignored. Then local people can end up being penalised by inappropriate development in the wrong places. This can happen even if there is only a minor problem in proving the 5YHLS.

These rules have led to significant speculative development across Oxfordshire in recent years, generally at the cost of greenfield sites in rural communities. They have undermined the Plan-led system and local democracy, and led to widespread disillusionment with the planning system as a whole. The sooner they are abolished, the better.

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NNGO also notes that the footnote number 9 on page 7 of the NPPF mentions ‘five year supply of deliverable housing sites’, ‘buffer’ and ‘the Housing Delivery Test’. This footnote needs to be removed or at least substantially amended as it may no longer be applicable, in line with our comments here and later.

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)?

YES

Difficulties in finding a 5YHLS are often nothing to do with the local authority and penalising them and local people by arbitrarily increasing the target is not a fair, reasonable or justifiable response. The buffers are unfair and a further mistaken imposition on local people and their plans. The buffers should be entirely removed.

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, the oversupply should be taken into account.

If there is a 5YHLS, then it would be reasonable to allow for oversupply in future calculations. Oversupply may not be anything to do with the local authority, they have few powers to delay or bring forward timely development. Having to further complicate the system to deal with early oversupply makes the system even more complex and incomprehensible. That the system might require complicated changes to deal with early oversupply – which is not even a problem! – shows that the 5YHLS system is fundamentally penal and wrong. It should never have been imposed on local people and their plans!

So as we don't think there should be a 5YHLS at all, oversupply will not be a problem and it never should have been.

It is also wrong to carry forward undersupply figures from previous plans – if a year's target was missed, then the local authority should review the reasons. If the target was unachievable or if there are other good reasons it was missed, it should not be rolled forward into a subsequent plan.

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

Generally, there will be no need for it if there is no 5YHLS system. If there is, then we note that relevant parts of the proposed addition to the NPPF dealing with the presumption in favour of development, Para 11biii, is as follows:

*Plans and decisions should apply a presumption in favour of sustainable development. For **plan-making** this means that:*

...

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁶, unless:

...

iii. there is clear evidence of past over-delivery, in terms of the number of homes permitted compared to the housing requirement in the existing plan; in which case this over-delivery may be deducted from the provision required in the new plan.

This is a reasonable addition to correct a problem, as past over-delivery should not ratchet up the figures and open the door to being forced to allow even more sites, under the 'presumption in favour of sustainable development'.

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?

NNGO thinks that paragraph 11dii) should be amended by deleting the words 'significantly and demonstrably'. These words make the test too difficult, allowing poor, badly planned and located development as well as damaging impacts on local people and local environments. Most cost benefit analyses do not have that kind of condition added. If costs/problems are more than benefits, then don't allow it.

In line with our comments of paragraph 11d) ii, we think that the words 'significantly and demonstrably' should be deleted from Para 14 to be consistent.

We also support the suggested deletion of Sections c) and d) of paragraph 14 as NNGO thinks that BOTH the 5YHLS AND the Housing Delivery Tests should be removed.

A local area may not deliver sufficient housing for reasons that are entirely beyond the control of its local authority or residents, for example a failure of developers to build developments as promised, a shortage of investment funds, some other national crisis, or other unavoidable reasons beyond local control. Why should there be any penalty at all, paid locally, for something that is not in local control?

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.

The sustainability test in para 1 is very important and necessary. Infrastructure mentioned in para 7 is also key – over development or relying on existing stressed infrastructure (for example the A34 and A40 in our case and water supply and sewage treatment) is a real cause of problems and local concern.

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

You accept the need to review the Standard Formula but say this will not be before 2024. In the interim period, please will you accept a more relaxed approach instead of rigorously applying the existing rules when contentious applications end up being considered by your Inspectors?

Otherwise, NNGO recognises and has experienced all but one of the difficulties you mention. So, though we are opposed to having a standard method formula and the housing delivery test, if it is to remain, we support the plans to review them, considering the 2021 Census results instead of the long out of date 2014 based figures.

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, with reservations.

Emphasising the ability to use an alternative approach will be welcome. In our experience, inspectors have been extremely reluctant to accept that housing need / requirement is not set in stone by the existing guidance and that figures can or even should be reduced where limited by AONB, Green Belt etcetera.

This has even been the case when an urban area (Oxford City) has repeatedly produced projections that go far beyond the standard method, then offloaded their exaggerated housing needs onto surrounding areas, leading to widespread destruction of the Green Belt and sometimes allowing large unsuitable sites with poor access and outside existing settlements.

A clear list of demographic and geographic factors that could be used to demonstrate reasons that could justify a lower than standard method figure would therefore be welcome. This should include ability to meet net zero commitments, protection of Green Belt and Areas of Outstanding Natural Beauty, protection of core and recovery zones of Nature Recovery Networks, sustainability of water resources and wastewater infrastructure and the sustainability of active travel measures.

Overall, NNGO remains unconvinced that a centrally set Standard Method is appropriate as anything more than broad guidance. Central government in Whitehall cannot, even with a spreadsheet, produce a reliable figure for how much housing can or should be built in hundreds of different areas.

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, but with reservations that a tougher line should be taken on building in the Green Belt and AONB or any other invaluable protected area. NNGO has encountered developers, politicians and some senior planners, for whom building in the Green Belt is seen as a career success rather than the failure that it is.

NNGO has seen building in the Green Belt which is only justified by inflated forecasts of growth, growth that has not materialised recently and would anyway be better occurring elsewhere in line with the levelling up agenda.

NNGO has seen great wildlife sites in urban areas that are to be destroyed by building. Also a site where promised rates of house building have not been achieved and where recent falls in house prices will undermine and maybe remove the provision of affordable property.

The Green Belt is probably the only planning policy that most people have heard about and understand. It has worked well for many years, preserving boundaries around many settlements and preventing urban sprawl.

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?

The question assumes that high density is a bad thing. However, higher density can be a more sustainable option, reducing land take and energy use and it supports public transport and services. Density does not have to equal high rise. Good design is key to all developments – but the higher the density, the better the design will need to be.

NNGO would therefore generally welcome a move towards medium and high-density new housing.

However, a one-size fits all approach cannot be taken to what will clearly be a subjective test. Therefore, demonstrating that there has been robust and effective community consultation and engagement must be put at the heart of the evidence local planning authorities should be expected to provide.

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?

NO.

NNGO thinks that Local Plans should be ‘Justified’ in the widest sense. That means being able to demonstrate that they are the most appropriate strategy, compared to reasonable alternatives.

We have encountered Inspectors who gave little consideration to limitations on land availability but instead accepted unrealistically high forecasts based on over-optimistic growth projections that have failed to materialise.

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?

NO.

The current consultation proposals do not allow sufficient flexibility for plan making authorities or local plan inspectors to take advantage of the revisions, which include the ability to plan for a more appropriate housing target for that area.

A foreseeable consequence would be for plans to unnecessarily go through the costly and timely examination process and be found sound, only for an authority to opt not to adopt that plan but instead submit a revised plan which does take advantage of the revisions.

A more pragmatic approach should therefore be taken to the transitional arrangements. This could be to allow modifications to be suggested from the pre-submission stage onwards which give regard to revised policy position, where appropriate to the circumstances.

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

It is not clear what changes are proposed – further consultation is planned.

NNGO recognises that the supply of urban brown field land is not unlimited but higher densities may be appropriate when there is redevelopment, especially if well-designed. Urban areas with pressing affordability issues should prioritise housing development on any available brown field land. This should be supported by robust policies which truly encourage and incentivise both the identifying and then the delivery of appropriate brownfield development sites. This could include the imposition of the brownfield targets, accompanied by annual monitoring reports which record progress on brownfield development.

NNGO would welcome the removal of the ‘Duty to Co-operate’. As noted before, NNGO has been frustrated when an urban area produced projections that went far beyond the standard method, then dumped the resulting exaggerated housing needs onto surrounding districts. This led to much destruction of the Green Belt and the use of unsuitable sites with poor access.

In our experience, the Duty to Co-operate resulted in arbitrary agreements arrived at behind closed doors, with no public engagement or accountability. Some form of collaboration is clearly required so we will watch to see the proposed ‘alignment policy’ info.

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?

More advice on options for developing at higher densities might be useful. This should be based on actual examples of good practice.

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?

Neighbouring authorities should have the power to intervene and assist, but should not be forced into doing so.

Para 16 - NNGO wishes to comment on paragraph 16, which mentions the continuing use of the 2014 based household projections to set local targets. Our view is that once later figures emerged, which as we recall showed lower rates of growth, it would have been entirely reasonable for the government to have reduced the 300,000 target. There is no basis for continuing to use the 2014 figure. The more recent forecasts don’t show that need is anything like that amount of growth. NNGO would also like to point out that much of the projected growth in household numbers is due to increases in the number of

elderly households, but little attention seems to have been paid to that. Elderly people often have difficulties with stairs, so the modern tendency to build many town house style properties with 3 floors and two sets of stairs is inappropriate. Similarly, there is a need for more affordable property for younger people – but local housing schemes have prices that are far beyond what many of them can afford.

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?

YES. If any speculative applications get round these arrangements, Ministers should intervene and use their discretion to prevent them going ahead.

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?

NO.

NNGO thinks the whole HDT system – which featherbeds developers and removes their responsibility to build on land that is zoned for housing in the local plan, should be scrapped. 15% should not be added to the housing requirement. If anything, NNGO would suggest that on a regular basis, authorities should prepare a report that lists sites in the local plans, with the names of the developers and finds and sets out their reasons and explanations for the lack of progress.

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?

NO.

As explained, we disagree with the whole HDT concept. 15% should not be added. Sorting out more figures will involve more work by planning departments which, given the extreme shortage of funds and staff, could more usefully be used in sorting out the local plans and dealing with applications faster.

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

NNGO thinks it will turn out to be more complicated, bureaucratic and pointless, bogged down in case law and barristers fees.

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

NNGO doesn't think you should apply the HDT test at all.

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 definition of affordable social housing is apparently 80% of market value. Local authorities should be allowed to vary this according to local needs. In more expensive areas a figure much lower than 80% may be appropriate;**
- **The 10% figure for affordable homes in major developments in the NPPF is not enough. It should be increased, based on a national calculation of social housing need. Locally figures vary from 30% to 50%. Local authorities must have the discretion to vary this figure.**
- **On individual large applications, it should be very difficult if not impossible for developers to come up with schemes that do not provide any affordable property. Providing affordable property elsewhere as agreed with the local authority should also be acceptable where it is clearly difficult to provide them 'on site'.**
- **When developers agree a number of affordable properties on a site, but then later claim that they can't afford to provide that many, the government should prevent them from getting away with this. What is actually happening is that in order to protect the profits of developers, the poorest members of our society are being denied good affordable places to live. Why should poor people pay to insure developers against loss?**
- **The government should stop their schemes that ostensibly increase affordability, but which actually tend to increase profitability (such as 'Help to Buy' and reducing Stamp Duty) as well as tackling measures that encourage housing as an investment opportunity, such as buy to let mortgages. These and similar policies push up prices (as buyers can pay more, sellers realise this and put up prices).**
- **One of the best ways of sorting out affordability would be to raise people's incomes in real terms. This means seriously tackling and preventing the problems caused by things like zero hours contracts, bogus self-employment and low/poverty wages generally.**

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

As noted in our comments on Para 16, future growth in household numbers is increasingly driven by increases in the number of elderly households. So, more specialist housing will be needed and more new houses should be designed to be suitable for elderly people.

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?

Local authorities might be empowered to buy suitable small sites where they can build affordable property. Good design and high quality are important,

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

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, we think that such unscrupulous developers should be committed to the outer darkness, but NNGO are not sure it will stand up in court. For it to work, authorities would need to have a formal register of bad behaviour. Hard evidence would be needed. Would there be a life time ban or could it be for a few years? Anyone put onto the register would have to be informed and would be allowed to appeal against that. Would someone ‘on the register’ in one area be impacted if they applied in another area? It might not be a disincentive if the person had no plans to make any planning applications in the future. There are also problems with substitutes – what if someone asked their ‘best mate’ or a ‘Company’ they had just registered - to apply instead of them. Could a ‘best mate’ be put on the list if links with someone on the list were proven? There would probably need to be some sort of appeal system for each particular incident... Is denying permission an appropriate punishment...

NNGO thinks it would be far better to have much stronger range of enforcement powers to remedy the original problems appropriately and proportionately. For example, there could be fines and the powers to confiscate related land, money, property or goods. Powers to respond to failure to ‘build out’ sites might be included.

More evidence of cases showing what exactly happened and what might work to remedy it would be needed to sort out what powers were needed.

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

NNGO thinks you would probably need to have both options.

Q.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?

YES. See response to Question 30 for our suggested approach.

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. But NNGO are not convinced that there is consensus about what is or is not beautiful. We think that it is worth giving this a try though.

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. References to well designed with beautiful added are found at paragraphs 8b, 73/74c, 84/86a, 92/94 header, 92/94b and 124/126e (both the old and the new paragraph numbers are shown...

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

YES, but what is clear to one person may not be clear to another. We think more examples are needed to understand this issue.

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, no, no. NNGO thinks that the government should not waste its time getting involved in minor issues of this sort. It is up to local planning departments to decide what is or is not acceptable. If local people want to change this, there are democratic means of doing so. The government getting involved in minor details of design would be the thin end of a wedge to allow all sorts of pettifogging details. For this to work, you would have to precisely define what a 'mansard roof' is, how steep, tall etc.

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?

It is obvious to anyone that the climate is changing and the planet is warming. Record temperatures, fires and flooding were experienced across Europe and the World last year. So, by all means outlaw artificial grass (it is difficult to keep clean) but NNGO thinks you should really focus on the bigger picture, such as the creation of a national land use strategy.

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?

NO. There should be specific changes to policy to provide the protection of high-quality farmland from development that has been promised.

There should be a firm presumption against development on BMV land – the higher the ALC grade, the greater the weight should be attached to its protection. We support calls for Grade 3b to be included within the BMV definition.

There should be recognition of the national strategic importance of best and most versatile agricultural land for food production both nationally and locally, taking into account the scarcity of such land in the area of a given grade.

Site-specific surveys should be mandatory on any development proposals involving more than one hectare of land unless it is clear that the site will not contain BMV land.

Local authorities should be required to identify and track development on BMV land in their district.

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 could have dramatically improved the energy efficiency of new housing decades ago. Public and private transport systems need to be decarbonised rapidly. So, can't you bring forward any of the planned actions?

Obviously, it is hard to calculate the carbon emissions from putting together plans and even harder to calculate their long-term effects. It is clear that building large numbers of houses and the related infrastructure does currently mean emitting a lot of CO2. Probably some average figures could be produced?

- All local plans should contain a robust strategy for delivering the council's net-zero carbon target integrated across the plan as a whole, and this should be an additional test of soundness at examination;**

- All new developments should demonstrate a measurable reduction in net carbon emissions over the life of the development;
- All transport interventions should demonstrate how they will deliver a reduction in private car mileage;
- Any above-baseline targets to boost the amount of housing and employment development must also be justified on the basis of the additional carbon reductions they will deliver;
- Decision-makers should have policies that empower them to refuse planning applications which do not contribute to these requirements.
- Monitoring embedded carbon and full carbon life assessment in development is vital to reaching net zero as quickly as possible. Such assessments should also include other greenhouse gases.

We also need the government to provide local authorities with more powers and resources for retrofitting existing buildings and infrastructure to enable de-carbonisation.

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?

The Levelling Up agenda has a critical role to play. Reducing development pressure in the water-stressed South-East is logical. Likewise, supporting growth in areas in need of urban regeneration would reduce the pressure on the countryside which will be needed for other climate mitigation measures. Both a strong brownfield first policy and the expansion of protection of high-quality farmland from development are vital.

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

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

NO.

As proposed, National Development Management Policies would be at the sole discretion of the Secretary of State to introduce, change or remove as they see fit, without any requirement for consultation. This risks undermining local democracy and the ability to adapt to local circumstances.

We can support the principle of establishing template national policies, for example on Net Zero, rooftop renewables, brownfield first. However, there must be some flexibility for local authorities to customise to fit local circumstances, where appropriate evidence supports this.

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

See Q49.

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

See Q49

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?

See Q49.

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?

NNGO has been concerned for some years about over-ambitious plans to encourage development in Oxfordshire. One recent plan proposed that for every two houses we had now, one more should be built by 2050. This would increase the housing stock by 50% and urbanise most of the County. There was no evidence that growth would ever reach or continue at that scale. To achieve growth on that scale, thousands of people had to move – probably from other parts of the country – to Oxfordshire. This seemed likely to seriously undermine and even prevent attempts at levelling up elsewhere.

Our suggestions are:

- **Introduction of a genuine brownfield-first policy**
- **Greater recognition of the climate and biodiversity emergencies in assessing harm v benefit of major development**
- **Greater policy focus on meeting the real need ie housing available for social rent, rather than market housing**
- **More devolution of powers and funding to local authorities**
- **Investment in transport infrastructure to focus on active travel and public transport, rather than road-building**
- **Requiring appropriate provision to be made for health and social facilities on, or that are needed to support, new developments**

Q.54: How do you think the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the levelling up agenda?

See Q53.

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?

Yes, government could introduce a robust brownfield-first policy, and favour and issue advice on higher density developments which would be more sustainable and reduce land take in both rural and urban situations.

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 feel safe in our public spaces, including for example policies on lighting/street lighting?

YES.

However, we do not believe there is any evidence to suggest a correlation between reduced lighting and increased crime or road accidents.

Therefore lighting schemes must be based on engagement with the local community and proportionate to the local circumstances, as well as being backed by strong light pollution measures, particularly in rural areas.

Q.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?

It would be helpful if local authorities could respond formally to public consultations. Explaining where they had made changes as a result of comments in response to Local Plan consultations, as happens with individual planning applications.



Planning for Real **NEED** not Speculator **GREED** in Oxfordshire

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