

Technical Considerations – LDF Consultation

The preparation of the LDF requires three distinct phases of consultation: the issues and options, the preferred options and submission stage. This process is required for every type of Development Plan Document (ie the Core Strategy or Supplementary Planning Document). The consultation proposes that this be reduced to an option and a submissions consultation except where the local planning authority consider it appropriate to undertake the separate issues and options consultation.

Comment

The three stage consultation has proved to be very unwieldy and not provided the streamlined process anticipated. The pragmatic approach now being suggested will certainly help to reduce the length of time it takes to produce the LDF without undermining the democratic input.

Currently when the LDF Submission Document is presented to the Secretary of State (SoS) for examination there is no opportunity to amend the plan in light of comments received. Accordingly when helpful comments are submitted, the LPA is unable to make changes to the Plan before it is considered by the Inspector appointed by the SoS. The consequence of this is that a change that may make the Plan sound (and acceptable) cannot be considered except as part of the formal examination. It is proposed to introduce a stage that allows for changes prior to formal examination.

Comment

The Committee will recall that the Runnymede Submitted LDF Core Strategy was considered by an Inspector to be potentially unsound. As it was not possible to make any changes it was resolved to withdraw the Core Strategy and return to first principles. The type of mechanism now being proposed may have enabled the Core Strategy to proceed with changes and is welcomed. It may also be of value for the Government to introduce a stage that enables an Inspector to have an exploratory meeting with the LPA and others to identify any issues that may reduce challenges on the 'soundness' of the Plan.

Currently when a Supplementary Planning Document (SPD) (ie additional interpretation of a policy such as affordable housing) is prepared, it needs to be in accordance with a policy in the DPD. However, it is proposed to allow the SPD to be also prepared in accordance with national policy or the Regional Plan (ie the SE Plan).

Comment

This is a sensible approach to the preparation of an SPD.

The proposals above will form part of a restructuring of Planning Policy Statement 12. As part of the revision to PPS12 it is proposed to highlight the fact that the LDF Core Strategy is a fundamental part of the Council's place shaping role and a key element of the Sustainable Community Strategy and the revised funding mechanisms that form part of the Local Area Agreement process.

Comment

The revised role of planning from a regulatory tool to a process at the heart of Local Authority strategic thinking is a big step. It will need a significant change in attitude that will require strong guidance to other local authority activities to emphasise the new role for planning. This may not be as easy as the Government is suggesting and has parallels with the difficulties that the introduction of the new LDF process had in transition from the old system.