

National Planning Policy Framework

1. The Environmental Audit Committee and the Communities & Local Government Committee have undertaken linked but separate inquiries on the draft National Planning Policy Framework (NPPF). This Annex sets out the results of the EAC's inquiry, which has examined the extent to which the NPPF reflects sustainable development principles.
2. We took evidence on 12 October from the Campaign to Protect Rural England (CPRE), the National Trust, the Town & Country Planning Association (TCPA), Friends of the Earth, the Home Builders Federation (HBF) and the British Property Federation (BPF), and CLG and Defra ministers Greg Clark MP and Richard Benyon MP.

Risks to sustainable development in the NPPF

The components of sustainable development

3. The draft NPPF states that in setting out the Government's economic, environmental and social planning policies, it articulates 'the Government's vision of sustainable development', to be 'interpreted and applied locally to meet local aspirations'.¹ This vision needs to be clearly articulated because it will be used as a material consideration in planning decisions and might have to be tested in the courts.
4. As we discuss below, sustainable development comprises three pillars – economic, social and environmental. The draft NPPF states that:

These three components should be pursued in an integrated way, looking for solutions which deliver multiple goals. There is no necessary contradiction between increased levels of development and protecting and enhancing the environment, as long as development is planned and undertaken responsibly.²

On the other hand, it also states that:

... planning should proactively drive and support the development that this country needs. Every effort should be made to identify and meet the housing, business, and other development needs of an area, and respond positively to wider opportunities for growth. Decision-takers at every level should assume that the default answer to development proposals is "yes", except where this would compromise the key sustainable development principles set out in this Framework.³

5. The issue of the balance given to the three pillars of sustainable development is at the heart of the current public debate on the NPPF. Paragraph 8 of the document

¹ NPPF, para 4

² NPPF, para 11

³ NPPF, para 19

tells us to consider the document as a whole, but paragraph 13 says ‘without growth, a sustainable future cannot be achieved’ and that ‘significant weight should be placed on the need to support economic growth through the planning system’.

6. The National Trust believed that the NPPF conflated sustainable development with economic growth⁴:

It quotes Brundtland [see para 29 below], but then goes on to deny the spirit and principles of Brundtland throughout the document, using the green wash of sustainable development frequently, but then making it quite clear that the dice are extremely heavily loaded with regard to economic development.⁵

7. The CPRE believed that the NPPF is ‘unacceptably weighted towards economic growth; it seems at almost any cost’.⁶
8. The Government’s position is that there is no change in policy. In a letter to the National Trust, the Prime Minister said:

I believe that sustainable development has environmental and social dimensions as well as an economic dimension, and we fully recognise the need for a balance between the three. Indeed, the purpose of the planning system as a whole, and of our proposals for it, is to achieve such a balance.⁷

9. The decentralisation minister told us, similarly, that the purpose of the planning system was to balance economic, social and environmental aspects of development.⁸ He noted that ‘the economy has always been part of the definition of sustainability and we do need homes and jobs’, but that any appearance in the NPPF of giving greater weight to the economic pillar was ‘not intentional’.⁹

10. **We recommend that the CLG Committee press the Government, in producing its revised version of the NPPF, to ensure that there is no potential for confusion about the equal importance of all three aspects of sustainable development. While local authorities ultimately have to consider what constitutes sustainable development in their area (paragraph 38), they need a NPPF which does not push them to regard economic dimension as predominant.** This uncertainty in the current draft, and the specific risks to sustainable development we discuss next, could be reduced if there were a clear and sufficiently detailed definition of sustainable development. We discuss this later in this Annex.

Guidelines and standards for sustainable development

11. Much of the debate surrounding the NPPF, as illustrated in the evidence to our two committees, is that it incorporates a number of changes that might be seen to be encouraging less sustainable forms of development:

⁴ Q 2 [NT] [references to Questions (Q) are to our oral evidence.]

⁵ Qq 2, 14

⁶ Qq 6, 28

⁷ *Daily Telegraph* website

⁸ Q 47

⁹ Q 56

- Weakening of the protections for the greenbelt. The CPRE had obtained legal advice that the NPPF weakens local authorities' ability to protect greenbelts.¹⁰ The Prime Minister wrote to the National Trust, however, that 'our reforms will maintain protections for the greenbelt, for National Parks and Areas of Outstanding Natural Beauty'.¹¹ And the NPPF notes that local neighbourhood plans should be able to identify, for special protection, green areas of particular importance to them.¹²
- The removal in June 2010 of the housing density standard, a national indicative minimum density of 30 dwellings per hectare. The density guideline was originally designed to reduce the loss of land to development and to make the provision of public transport and other services more readily viable, although we recognise that the aims of the standard have been interpreted in different ways in different areas.
- The removal of offices from the 'town centre first' policy. The town centre first policy was designed to create viable and vibrant town centres and reduce the amount of out of edge of town development, thus reducing the loss of greenfield land and reducing the need for travel and transport infrastructure. We heard of fears that a weakened town-centre-first (and brownfield-first) policy could lead to urban sprawl¹³ and an increase in car journeys.¹⁴
- The removal of the brownfield target in the March 2011 Budget. Previously, the target was that 60% of housing should be on previously developed land. This was designed both to protect greenfield sites and to guide development to locations where infrastructure and services (including public transport) might already be available.
- The introduction of a requirement that local planning authorities should include an additional allocation of land for housing development of at least 20% to ensure choice and competition in the market for land for housing. The NPPF notes that: 'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them'.¹⁵ Witnesses were concerned nevertheless that the 20% margin could lead housing developers to opt first for the greenfield element of that enhanced supply over brownfield land.¹⁶

12. Of these changes to policy in the NPPF that may adversely affect sustainability, the debate has mainly focussed on the greenbelt and the previous brownfield-first policy (which is of course closely linked to green space protection). Many organisations

¹⁰ Q 30 [The NPPF changes the existing guidance on development on Green Belt from a 'presumption against inappropriate development in the greenbelt' to '[development] should not be approved except in various special circumstances' (paragraph 142). A legal opinion, obtained by CPRE, sets out that this rephrasing may potentially remove the existing burden upon an applicant, established in case law, to demonstrate that special circumstances exist to justify any development on green belt land (<http://www.cpre.org.uk/resources/housing-and-planning/planning/item/download/1442>)].

¹¹ *Daily Telegraph* website

¹² NPPF, para 49

¹³ Q 19 [TCPA], Q 24 [CPRE]

¹⁴ Campaign for Better Transport written submission to CLG Committee

¹⁵ NPPF, para 130

¹⁶ Eg. National Trust and CPRE written submissions to CLG Committee

have expressed their concerns about the NPPF not including any clear reference to the previous brownfield-first policy. The NPPF speaks instead in terms of development on sites with least environmental or amenity value, ‘regardless of its previous or existing use’,¹⁷ and some witnesses had expressed a concern that that test might make agricultural land vulnerable to development.¹⁸

13. The decentralisation minister rejected any suggestion that the Government’s intention was no longer to see brownfield sites developed before greenfield sites.¹⁹ He highlighted that the NPPF introduces a requirement for local authorities to demonstrate that they are bringing forward land of lowest environmental value²⁰ first, which he considered was more helpful terminology.²¹ Some brownfield sites – abandoned quarries for example – had become environmentally valuable, and the wording in the NPPF is designed to reflect that.²²
14. The British Property Federation supported a brownfield-first policy, but the HBF saw the existing brownfield-first concept as ‘flawed’ because local authority plans had not made enough of such land available for development. They thought the NPPF, in giving development priority to sites according to least environmental value, was ‘a more sensible approach’ because it allowed ‘a more rounded balance of what works best in particular areas’.²³ Our developer witnesses considered that particular local authorities could in any case apply a brownfield-first policy in their Local Plan, provided such land allocations were viable for development; they simply had to put it into their Plan to avoid the default of the NPPF being applied.²⁴ The decentralisation minister told us that ‘some people ... have read more into the absence of the word brownfield than has been intended’ and indicated that the Government were considering ‘referencing’ the word in the final NPPF.²⁵
15. **We recommend that the revised NPPF clarifies that environmentally low-value brownfield development is encompassed by the term ‘lowest environmental value’, by for example referring to ‘brownfield’ development in the document, and that local authorities are advised that they may refer to brownfield development in their Local Plans.**

Lack of Regional planning

16. The Government intend to initiate secondary legislation to abolish Regional Spatial Strategies as soon as possible after the Localism Bill receives Royal Assent.²⁶ The TCPA highlighted the risks for sustainable development in a landscape without regional planning, not least to meet national and regional needs of food production, energy and climate change.²⁷ They told us that when the regional strategies are

¹⁷ NPPF, paras 19, 165

¹⁸ Eg. Q 29 [CPRE]

¹⁹ Q 69

²⁰ NPPF, para 165

²¹ Qq 68, 69

²² HC Deb 20 October 2011, cols 1082-3, 1167

²³ Q 38 [HBF]

²⁴ Qq 39, 40 [BPF, HBF]

²⁵ Q69

²⁶ HC Deb 7 November 2011, col 125

²⁷ Qq1, 4, 19

revoked, local authorities' plans will be open to challenge because they are based on evidence appropriate to the regional level, and local authorities were being told that they need not repeat policy that was contained in regional plans.²⁸ The TCPA saw a need for the Government to set out a spatial vision for England that would deal with the broad implications of, for example, demographic change and climate change and help reconcile the often conflicting imperatives of localism and the national pro-growth agenda.²⁹

17. With the Localism Bill, the TCPA argued that 'we have voluntary strategic planning now', making the duty to cooperate pivotal,³⁰ and 'without there being any regional planning now, the whole weight of responsibility of European directives and national legislation falls on [the] district authority'.³¹ The decentralisation minister told us that 'it will be a test of the soundness of any plan whether the duty to co-operate has been properly and fully discharged'.³²

18. The HBF saw a need for 'a similar discipline' to the outgoing regional plans, but 'with that came a responsibility to adopt a suitable local plan'.³³ The minister emphasised that such local plans will have to be evidence-based, 'not just on the basis of assertion'.³⁴ He told us:

... by getting rid of the regional strategies, which, for example, imposed a housing number for each authority, we are giving a responsibility to the local council to make a fair-minded assessment, a rigorous assessment, of their housing need and then to say where it should take place. That is a shift in power but also a shift in responsibility, but I think it is right to do that.³⁵

... some of the evidence has been almost kind of nostalgic for the regional approach ... We should be clear that we are not going back to that.³⁶

19. The finalised NPPF should be more specific about how local authorities should address 'regional' and 'larger than local' sustainable development factors – including for example food resilience, energy, climate change and some waste-management functions – as well as how the aims of the Natural Environment White Paper for designating green spaces, Local Improvement Areas and wildlife corridors would be progressed. The finalised NPPF should also specify how a duty-to-cooperate on such issues, as well as on developments on the boundaries between local authorities, would operate and be enforced. It should also address how the cumulative impacts of local development decisions will be monitored and controlled. Uncertainties about all these areas require a level of detail that the short NPPF document has not provided, and will need to be set out in supplementary guidance.

²⁸ Q 31

²⁹ TCPA written submission to CLG Committee

³⁰ Qq 23, 28

³¹ Q 26

³² Q 66

³³ Q 33

³⁴ Q 82

³⁵ Q 70

³⁶ Q 75

Incomplete Local Plans

20. The NPPF is clear about the requirements of Local Plans under the new system:

At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible. Local planning authorities should:

- prepare Local Plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes;
- approve development proposals that accord with statutory plans without delay; and
- grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.

All of these policies should apply unless the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.³⁷

21. As such, the NPPF has the potential to further strengthen the extent to which we have a plan-led system. The Minister thought that there had been ‘too little planning’ in the planning system, and ‘too much development control’.³⁸ Through the Localism Bill the Government are abandoning the regional strategies and ‘advantaging local plan making’.³⁹ The Planning and Compulsory Purchase Act 2004 introduced the new system of Local Plans seven years ago, but currently only just over 30% of authorities have had them approved.⁴⁰ The minister emphasised that the NPPF sets out principles that will apply in the absence of an up-to-date plan.⁴¹ The TCPA believed that when the NPPF is published even existing Plans ‘will instantly be out of date’;⁴² a view which the Government rejects.

22. BPF, on the other hand, saw less threat to sustainable development in the NPPF, because Local Plans could ensure sustainability principles were addressed, and where the Plan was absent, silent or indeterminate the presumption to approve the development would still have to pass the test that it satisfied the guidance of the NPPF *as a whole*.⁴³ For our developer witnesses, the most important aspect of the NPPF was that it would ‘create the right focus for positive plan making’.⁴⁴ It would ‘absolutely reinforce the primacy of having a plan and a plan-led system’.⁴⁵ In the past, the BPF told us, some local authorities had failed to produce plans because

³⁷ NPPF, para 14

³⁸ Q 47

³⁹ Ibid.

⁴⁰ Q 33

⁴¹ Q 47

⁴² Q 31

⁴³ BPF written submission to CLG Committee, para 15

⁴⁴ Q 33

⁴⁵ Ibid.

‘they have not actually wanted to face up to some of the real inherent difficulties in the system’.⁴⁶

23. The minister assured us that before a final NPPF is published, before April 2012, the Government would set out transitional arrangements that ‘will not be to the detriment of any authority that is doing the right thing in putting its plan together’.⁴⁷ He made a similar commitment to the House on 7 November.⁴⁸
- 24. The currently drafted NPPF is unsatisfactory in that it clearly presents different messages to different audiences about what the presumption in favour of sustainable development actually means in practice. That uncertainty, unless rectified in the final version, places a premium on having Local Plans in place at the earliest opportunity, to clarify a local authority’s view of the sorts of sustainable development it will approve. There should be transitional arrangements which would provide a realistic timeframe for authorities to put Plans in place, and the Government should establish what resources local authorities will need to adapt their systems for the new regime. And during that transition, while such Plans are being formulated and approved, local authorities should be able to judge planning applications on the basis of any existing Plans potentially rendered ‘out of date’ by the NPPF and by the relevant legacy policies in the revoked Regional Strategies.**

Need for a clear definition of sustainable development, and what it should cover

25. So far, in this Annex we have discussed the threats to sustainable development in the NPPF. Even if those risks are addressed, however, there will remain scope for continuing uncertainty about what constitutes sustainable developments unless the definition of sustainable development is clear and commonly shared. The NPPF provides a real opportunity to put in place a progressive definition of sustainable development.
26. In our report on *sustainable development in the Localism Bill*, we recommended that:
- The Localism Bill must provide a statutory duty to apply the principles of sustainability in the planning system and other functions of local government. The Bill must also provide a commitment to define the term ‘sustainable development’ in the planning context. An essential prerequisite of such a commitment will be to include in the Bill the five internationally recognised principles of sustainable development as set out in the 2005 Sustainable Development Strategy. A fuller explanation of what sustainable development means in the planning context should then be developed for the National Planning Policy Framework.⁴⁹
27. The Government response to our report was received on 12 August 2011, after the Localism Bill was sent to the Lords. It indicated that the principles called for by the Committee would be adopted in the NPPF, rather than included in the Localism Bill.

⁴⁶ Q 36 [BPF]

⁴⁷ Q 62. See also HC Deb 20 October 2011 col 1085

⁴⁸ HC Deb 7 November, col 125

⁴⁹ Third Report, Session 2010-12, HC 799, para 10

Amendments to include a definition of sustainable development during the passage of the Bill were not successful.⁵⁰

28. Paragraph 9 of the draft NPPF defines sustainable development as:

... development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle underpinning planning. Simply stated, the principle recognises the importance of ensuring that all people should be able to satisfy their basic needs and enjoy a better quality of life, both now and in the future.

29. This definition reflects that used in the 1987 report from the UN World Commission on Environment and Development – the ‘Brundtland Report’. Several groups have told our committees that the Brundtland definition is insufficient and that thinking on sustainable development has moved on. They wanted to see reference to the sustainable development principles set out in the 2005 Sustainable Development Strategy, and perhaps also Planning Policy Statement 1 (PPS1) which reflects similar considerations.⁵¹ In the nearly quarter of a century since the Brundtland definition was drafted, sustainable development is no longer just inter-generational – important as that is – but is inter-community, addressing social justice.

30. The aims for sustainable development set out in its 2005 Strategy were: living within environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; using sound science responsibly; and promoting good governance. The Strategy states that these aims should be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal well being, in ways that protect and enhance the physical environment and optimise resource and energy use.

31. PPS1 refers to the Strategy, identifying four aims for sustainable development: social progress which recognises the needs of everyone; effective protection of the environment; the prudent use of natural resources; and the maintenance of high and stable levels of economic growth and employment. It continues:

These aims should be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal well being, in ways that protect and enhance the physical environment and optimise resource and energy use.⁵²

32. The Government’s ‘vision’ for sustainable development, published in Defra’s February 2011 *Mainstreaming Sustainable Development*, builds on the principles that underpinned the 2005 Sustainable Development Strategy.⁵³ However, the NPPF does

⁵⁰ Including most recently on 7 November.

⁵¹ Eg. CPRE, TCPA, National Trust and House Builders Association written submissions to CLG Committee

⁵² PPS 1, *Delivering Sustainable Development*, 2005, para 4

⁵³ EAC, Fourth Report, Session 2010-12, HC 877, para 7

not incorporate this post-Brundtland view of sustainable development. As the TCPA put it:

[The NPPF] ignores the very valuable learning and knowledge which underpinned the ambition of the 2005 [Sustainable Development] Strategy. The reference to the Brundtland definition in paragraph 9 of the draft NPPF does capture the notion of protecting the interests of future generations but it does not provide a detailed mechanism for its implementation which is contained in the Sustainable Development Strategy. For example, one of the key bridging concepts between Brundtland and practical delivery was the notion of ‘living within environmental limits’. The draft NPPF contains no reference to this foundational aspect of sustainable development. Neither is there any content on social justice or equality which featured heavily in the existing PPS 1. The net result is that the draft NPPF does not contain a recognised or comprehensive definition of sustainable development and does not appear to have the operational principles necessary for its delivery. This is a crucial concern because the new test of whether a development is ‘sustainable’ in relation to the presumption in favour of sustainable development is now to be solely the NPPF which itself re-defines sustainable development as largely economic growth.⁵⁴

33. The minister told us that he had used the Brundtland definition because it was already subsumed in legislation (the 2004 Planning and Compulsory Purchase Act) and that it ‘seems to us to have stood the test of time’.⁵⁵ The minister posed the question: ‘whether it is best to have on the face of the guidance the core definition or whether to refer to one of the more recent expansions of it’.⁵⁶
34. But there is scope to go further. Thinking on sustainable development is increasingly considering it in terms of the economy and society having to operate *within* environmental limits, rather than balancing three equally-weighted pillars.⁵⁷ Ministers correctly noted that ‘thinking may have evolved’, and that ‘it is not a question of balancing harm to the environment against benefit to the economy’.⁵⁸ The Government’s Natural Environment White Paper goes beyond the thinking in the 2005 Strategy, the decentralisation minister told us, not just being about avoiding breaching environmental limits but, more ambitiously, seeking a ‘net gain to the environment’. He made a similar point in the debate on 7 November.⁵⁹ He told us that he would not want to set down a definition of sustainable development that was less ambitious than the Natural Environment White Paper.⁶⁰ Developments should not follow ‘a miserablist view’ of seeking least damage,⁶¹ but ‘ought to take the opportunity to improve the environment’.⁶²
35. **We welcome that ministers have been consulting, across departments, about the sustainable development agenda and how that might be defined and applied in the**

⁵⁴ TCPA written submission to CLG Committee

⁵⁵ Q 51

⁵⁶ Ibid.

⁵⁷ Qq 1, 17

⁵⁸ Qq 52, 53

⁵⁹ HC Deb 7 November 2011, col 123

⁶⁰ Q 52. See also HC Deb 20 October 2011 col 1085

⁶¹ Q 60

⁶² Q 57

planning context.⁶³ The NPPF reflects that to a degree, but it could go further. To respond to the question the minister posed, the NPPF should embrace a wider definition of sustainable development than just the Brundtland definition. It should include or refer explicitly to the 2005 Sustainable Development Strategy and PPS 1, as we describe above. But it should go further still, and reflect the primacy of environmental limits, couched more firmly in terms of seeking environmental *improvement*. By doing so, it would encourage local authorities to include in their Local Plans a requirement for some types of development to include environmental gain. The final version of the NPPF, subsuming such more helpful references, should also be signed-off not just by CLG but also the ministers of other key departments with a sustainable planning agenda – Defra, DfT, BIS, DECC, Cabinet Office, DCMS and Treasury.

36. Insufficiently directed local decision-making might risk sub-optimal sustainable development. CPRE, while supporting localism, did not see that necessitating the planning framework ‘abrogating any responsibility for directing local decisions’, over for example the brownfield-first policy.⁶⁴
37. The minister told us that the NPPF is ‘guidance’ rather than a change in law (and therefore no strategic environmental assessment was undertaken on the NPPF).⁶⁵ As such, the NPPF does not require new legislation to be implemented. Some of our witnesses nevertheless favoured defining sustainable development in the Localism Bill.⁶⁶ The TCPA believed that ‘without that key lodestone at the very heart of the planning system, there will be a confusion about what we are trying to achieve in spatial planning in England’.⁶⁷ In the event, the Bill has not included a definition of sustainable definition. However, even putting it in the NPPF and any associated more detailed guidance would help ensure that the planning process fully considers sustainable development.
38. Local decision-making is, in itself, very much part of the sustainable development architecture (the 2005 Sustainable Development Strategy explicitly addressed the need for strong communities and social cohesion). A detailed definition of sustainable development cannot, and should not, in itself dictate a particular development outcome. Sustainable development solutions are location specific, interpreted for the particular circumstances of individual local authorities and communities.⁶⁸ The BPF saw a need for the NPPF to leave it to local areas to decide which pillars of sustainable development should take precedence, and in some areas that might be designating land for ‘employment’ purposes.⁶⁹ The Local Government Group wanted planning authorities to have room to make decisions based on locally determined sustainable development priorities, which would be ‘important to the long term success and sustainability of places and to making development acceptable to local communities’.⁷⁰

⁶³ Q 61

⁶⁴ Q 18

⁶⁵ Qq76-78

⁶⁶ Q 3 [Friends of the Earth, TCPA]

⁶⁷ Q 4

⁶⁸ Q 4 [CPRE]; Q 7 [National Trust]

⁶⁹ Q 34

⁷⁰ Local Government Group written submission to CLG Committee

39. **There are advantages in a definition of sustainable development and its principles being spelt out, to bring greater clarity about the purpose of planning and to help ensure that the planning process continues over the long term to address all aspects of sustainable development. A definition of sustainable development in the NPPF ‘guidance’ that captures the fundamental principles in the 2005 Sustainable Development Strategy and PPS 1 (as we describe above) would help achieve that. With such greater clarity, local authorities will be able to interpret sustainable development for the circumstances of their particular areas.**

Conclusions

40. As a result of our inquiry, we would support recommendations by the CLG Committee that the finalised NPPF is revised:
- to ensure that there is no potential for confusion about the importance of all aspects of sustainable development, so that local authorities can be in no doubt that the economic dimension is not predominant.
 - to clarify that environmentally low-value brownfield development forms part of land of ‘least environmental value’.
 - to be more specific about how local authorities should address ‘regional’ sustainable development factors – including food resilience, energy, climate change and waste-management – and about how a duty-to-cooperate on such issues would operate and be enforced.
 - to embrace a wider definition of sustainable development than just the Brundtland definition, to include or refer explicitly to the 2005 Sustainable Development Strategy and PPS 1, but also to reflect the primacy of environmental limits couched more firmly in terms of seeking environmental *improvement*.
41. The uncertainties in the currently drafted NPPF, unless rectified in the final version, place a premium on local authorities having Local Plans in place at the earliest opportunity. Transitional arrangements are needed to provide a realistic timescale for authorities to put Plans in place, and the Government should establish what resources local authorities will need to adapt their systems for the new regime. And during that transition, while such Plans are being formulated and approved, local authorities should be able to judge planning applications on the basis of any existing Plans and by the legacy policies in the revoked Regional Strategies. Furthermore, **the scale of change needed to the document suggests to us a need for a further round of public consultation once an improved draft is produced by the Government. The House should also be given an opportunity to vote on the NPPF.**