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Planning Inspectors:  
Jonathan Manning and Christa Masters  
c/o Programme Officer, Ms Edwards

Your ref: INS12  
Our ref: LBI06

6 September 2021

Dear Inspectors,

**Re: LB Islington response to ninth letter (INS09) from Inspectors**

Thank you for your ninth letter (document reference INS12) where you asked the council if the publication National Planning Policy Framework 2021 (NPPF 2021) on 20 July 2021 would have any possible implications for the content of the Islington Local Plan and what impacts the changes within NPPF 2021 will have on the DPDs. We have set out our thoughts on this in the table below.

The Council has undertaken a comparison exercise between the NPPF 2019 and NPPF 2021 and considered this against the Islington Local Plan. In the right-hand column of the table the Council sets out its position relevant to each update to the NPPF 2021. Changes to footnotes have not been included unless they are considered relevant.

It is the Council's overarching view that whilst the NPPF 2021 introduces new concepts and considerations, it does not represent a departure from the policy requirements already established by the NPPF 2019. On the matters of Achieving Sustainable Development (Chapter 2), Achieving Well Designed Places (Chapter 12) and Conserving and Enhancing the Historic Environment (Chapter 16), the changes have added to, rather than overhauling the relevant chapters.

Please let me know if you have any questions regarding the above.

Yours sincerely



Jonny Gibb  
Team Leader Planning Policy  
Islington Council

Para. no.	NPPF 2021 Wording	Consideration of implications for the Islington Local Plan
<b>CHAPTER 2: ACHIEVING SUSTAINABLE DEVELOPMENT</b>		
7	<p>The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. <b>At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.</b></p>	<p>The objective of achieving sustainable development through the planning process is long-established by earlier versions of the National Planning Policy Framework. The Plan is consistent with this with a clear vision and objectives in relation to the social, economic and environmental pillars of sustainable development, which other plan policies help to deliver. The plan is therefore aligned with the UN Sustainable Development Goals at a high level. Specific examples of alignment on individual goals include objectives to tackle poverty and inequality (e.g. objectives 1 and 2), promoting healthy lives and well-being (e.g. objectives 5 and 6), affordable and clean energy, tackling climate change and its impacts (e.g. objective 5), promoting inclusive economic growth (e.g. objective 2), responsible production (which links to the circular economy) and making cities inclusive, safe, resilient and sustainable (e.g. objective 3).</p>
8b	<p>Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):</p> <ul style="list-style-type: none"> <li>a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</li> <li>b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a</li> </ul>	<p>The objective of achieving sustainable development through the planning process is long-established by earlier versions of the National Planning Policy Framework, though the addition of the concept of creating beautiful and safe places is a new facet of this objective.</p> <p>MHCLG has been clear that achieving ‘beauty’ through the planning process is a <i>“high-level statement of ambition rather than a policy test.”</i><sup>1</sup> It has encouraged local planning authorities, communities and developers to <i>“work together to decide what beautiful homes, buildings and places should look like in their area. This should be reflected in local plans, neighbourhood plans, design guides and codes, taking into account government guidance on design.”</i><sup>2</sup></p>

	<p>sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, <b>beautiful</b> and safe built environment <b>places</b>, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p> <p>c) an environmental objective – to <del>contribute to protecting</del> <b>protect</b> and <del>enhancing</del> <b>enhance</b> our natural built and historic environment; including making effective use of land, <del>helping to improve</del> <b>improving</b> biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	<p>The draft Local Plan sets out the Council's aspirations for the creation and preservation of high-quality places. Policy PLAN1 provides the four key principles to do this. In particular the contextual principle expects development to respond to and enhance the existing site context and not undermine the quality of existing development. This is supported by policy DH1 which supports innovative approaches to development whilst also protecting and enhancing the unique character of the borough. In addition Policy T1 sets out the approach to the public realm and links this to the design of development. Strong design-orientated policies in the Local Plan are considered to provide a suitable framework for high quality design which will enable 'beautiful' places.</p> <p>The change in relation to the protection and enhancement of the built and natural environment remains consistent with the Plan, including policies G1, G2, G3, G4 and G5 which cover the approach to green infrastructure and the natural environment, as well as policies in the Design and Heritage chapter alongside PLAN 1 which provide a framework for the built environmental.</p>
11	<p>Plans and decisions should apply a presumption in favour of sustainable development.</p> <p>For plan-making this means that:</p> <p>a) <del>all plans should positively seek opportunities</del> <b>promote a sustainable pattern of development that seeks</b> to: meet the development needs of their area; <b>align growth</b> and be sufficiently flexible to</p>	<p>The Plan continues to be consistent with this revised paragraph.</p> <p>The draft Local Plan sets out a spatial approach to development which is considered to promote a sustainable pattern of development with the principle of growth and development established in key areas including Bunhill and Clerkenwell, the borough's four town centres and other key areas of change. Generally these are around key transport hubs and regeneration areas.</p>

<sup>1</sup> MHCLG (2021). Government response to the National Planning Policy Framework and National Model Design Code: Consultation Proposals. Available from: <https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals/outcome/government-response-to-the-national-planning-policy-framework-and-national-model-design-code-consultation-proposals> [Accessed 05/08/2021].

<sup>2</sup> Ibid.

	<p><b>infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to rapid change its effects;</b></p> <p>d)....</p> <p>i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development <b>proposed;</b></p> <p>[Minor amendments to footnotes]</p>	<p>In addition over 150 site allocations ensure that the borough makes effective use of land. The plan also makes clear in policy DH1 part E that site density levels must be fully optimised in order to make the best use of the scarce land resource in the borough. In recognition of this scarce land resource the plan prioritises certain needs, principally conventional housing and business uses alongside social infrastructure.</p> <p>The plan approach to social infrastructure promotes new social and community infrastructure in accessible locations convenient to users as well as protecting existing social and community facilities.</p> <p>Policies to mitigate climate change have been strengthened in the Plan and are set out in the sustainable design chapter. In combination the policies make as holistic a response possible to climate change. Policies S6, S8 and S9 are particularly relevant to mitigating impacts of climate change through addressing heat risk, water shortage and flood risk.</p>
<b>CHAPTER 3: PLAN-MAKING</b>		
20	<p>Strategic policies should set out an overall strategy for the pattern, scale and <b>design</b> quality of <del>development</del><b>places</b>, and make sufficient provision for:</p>	<p>The introduction of the word “design” and replacement of “development” with “places” is not considered to affect the approach of the draft Local Plan. A strong design thread runs through the draft Local Plan with policies PLAN1, H4, SC2, B2, G4, T1, DH1, DH2 and DH3 all addressing quality of both building and place.</p>
22	<p>Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. <b>Where larger scale developments such as new settlements or significant extensions to existing villages and</b></p>	<p>Islington is an urban inner London borough with no scope for this scale of development so this change is not relevant.</p>

	<b>towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.</b>	
35	Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are: 35d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework <b>and other statements of national planning policy, where relevant.</b>	<p>The National Planning Policy for waste has been considered by the North London Waste plan, a separate DPD. Reference to this DPD is made under policy ST2 in the draft Local Plan.</p> <p>The national Planning Policy for Traveller Sites is referenced under policy H12.</p> <p>Consistency with national policy and soundness will be considered as part of the Local Plan examination process.</p>
<b>CHAPTER 4: DECISION MAKING</b>		
53	<p>The use of Article 4 directions to remove national permitted development rights should:</p> <ul style="list-style-type: none"> <li>• <b>where they relate to change from non-residential use to residential use</b>, be limited to situations where <b>this an Article 4 direction is necessary to avoid wholly unacceptable adverse impacts (this could include the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability, but would be very unlikely to extend to the whole of a town centre)</b></li> <li>• <b>in other cases, be limited to situations where an Article 4 direction</b> is necessary to protect local amenity or the well-being of the area (this could include the use of Article 4 directions to require planning permission for the demolition of local facilities)</li> <li>• <b>in all cases, be based on robust evidence, and</b></li> </ul>	<p>The Plan makes reference to the use of Article 4 Directions. Where they are proposed they will need to consider the amended policy in the NPPF. This is not considered to impact the Plan itself.</p>

	<b>apply to the smallest geographical area possible.</b>	
<b>CHAPTER 5: DELIVERING A SUFFICIENT SUPPLY OF HOMES</b>		
65	Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the <b>total number of</b> homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.	Policy H3 of the SDMP is consistent with the requirement that 10% of total number of homes in major development to be available for affordable home ownership as the proposed 70% social rented/30% intermediate tenure split could accommodate intermediate ownership products, particularly London Living Rent, which would be an affordable ownership product consistent with part d) of the NPPF affordable housing definition.
70	Neighbourhood planning groups should also <del>consider</del> <b>give particular consideration to</b> the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph <del>6869</del> <b>69a</b> ) suitable for housing in their area.	No implications for the draft Local Plan.
73	The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities <b>(including a genuine choice of transport modes)</b> .  ..... c) set clear expectations for the quality of the <del>development</del> <b>places to be created</b> and how this can be maintained (such as by following Garden City principles),; and ensure that <b>appropriate tools such as masterplans and design guides or codes are used to secure</b> a variety of <b>well-designed and beautiful</b> homes to meet the needs of different groups in the community <del>will</del>	There is no scope for this scale of development in the borough so this change is not relevant for the draft Local Plan.

	be provided;	
	<p>d) the development would involve the subdivision of an existing residential <del>dwelling</del> <b>building</b>; or</p> <p>e) the design is of exceptional quality, in that it:</p> <ul style="list-style-type: none"> <li>- is truly outstanding <del>or innovative</del>, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and</li> <li>- would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.</li> </ul>	This paragraph relates to rural development and is therefore not relevant for development in Islington.
<b>CHAPTER 8: PROMOTING HEALTHY AND SAFE COMMUNITIES</b>		
92b	are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of <b>attractive, well-designed</b> , clear and legible pedestrian <b>and cycle</b> routes, and high quality public space, which encourage the active and continual use of public areas;	Policies in Chapter 7 Public Realm and Transport provide a policy framework at the heart of which is the ambition to promote more active travel modes. In addition Policy T2B identifies that all pedestrian and cycling infrastructure is to be designed in accordance with relevant guidance.
96	<b>To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.</b>	<p>This is not considered to have specific implications for policies in the Plan.</p> <p>The Council has sought to work positively with public service infrastructure providers, such as the NHS, in the production of the plan and will continue to engage with public service infrastructure providers as part of future updates to the Infrastructure Delivery Plan.</p>

98	<p>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, <b>and can deliver wider benefits for nature and support efforts to address climate change</b>. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</p>	<p>This change is relevant to the Green Infrastructure Policies in the plan. Policies G1-G5 recognise the wider benefits of green infrastructure, including open space, in relation to nature and climate change.</p>
<b>CHAPTER 9: PROMOTING SUSTAINABLE TRANSPORT</b>		
106d	<p>d provide for <del>high quality</del> <b>attractive and well-designed</b> walking and cycling networks <del>and with</del> supporting facilities such as <b>secure</b> cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);</p>	<p>A key element of the policies in Chapter 7 Public Realm and Transport is the ambition to promote more active travel modes. In addition Policy T2, part D provides specific policy for supporting walking, including recognising that high quality, secure and safe public realm improvements can incentivise walking and resisting proposals that would have a negative effect on the public realm. Policy T2, part provides specific policy for supporting cycling, including through safe and continuous routes as well as setting out specific provision and standards for cycle parking.</p>
110	<p><b>c the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code</b></p>	<p>This paragraph relates to the consideration of development proposals. As set out in response to the changes made in paragraph 8b above the approach set out in the draft Local Plan provides a comprehensive approach to design. Policy T1 sets out the approach to the public realm and links this to the design of development. The Plan is considered to be consistent with the National Design Guide and National Model Design Code in seeking well designed streets, promoting active travel and public transport.</p>



<b>CHAPTER 11: MAKING EFFECTIVE USE OF LAND</b>		
125	<p><b>Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.</b></p> <p>Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies</p>	<p>The Plan provides a framework for using land efficiently, whilst also achieving high quality design (for example PLAN 1 and DH1). Such policies will also provide a suitable basis for future design guidance and masterplans to do this.</p>
<b>CHAPTER 12: ACHIEVING WELL DESIGNED PLACES</b>		
126	<p>The creation of high quality, <b>beautiful and sustainable</b> buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.</p>	<p>See discussion of change made to NPPF paragraph 8b above, the Council does not consider that the change has any implications for the policy in the draft Local Plan.</p>
127	<p>Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood <del>plans</del> <b>planning groups</b> can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, <b>both through their own plans and by engaging in the production of design policy,</b></p>	<p>Not relevant to the Plan.</p>

	<b>guidance and codes by local planning authorities and developers</b>	
128	<p>To provide maximum clarity about design expectations at an early stage, <del>plans or supplementary</del> <b>all local planning documents authorities</b> should use visual tools such as <del>prepare</del> <b>design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences.</b> <b>Design</b> guides and codes. These provide a <b>local</b> framework for creating <b>beautiful and</b> distinctive places, with a consistent and high quality standard of design. However their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety where this would be justified.</p>	<p>Alongside the design policies in the Local Plan, further detail on design is set out in guidance. The Council considers that the existing Islington Urban Design Guidance is broadly consistent with the National Design Guide (NDG) and National Model Design Code (NMDC); and provides clarity about the borough's design expectations. As such the IUDG essentially fulfils the same function as the guidance envisaged by the NPPF 2021. Existing design guidance will be updated to reflect the new Local Plan and this will take into account the principles in the NDG and NMDC</p>
129	<p><b>Design guides and codes can be prepared at an area-wide, neighbourhood or site specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents. Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop. Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the</b></p>	<p>Design guides and codes cannot be introduced at this stage of the plan making process. As noted in response to new paragraph 128 any guidance produced would take into account the guidance contained in the National Design Guide and the National Model Design Code.</p>

	<b>absence of locally produced design guides or design codes.</b>	
131	<b>Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.</b>	Policy G4 protects against the loss of trees generally, and seeks to maximise new biodiversity where new development is created. The enhancement of biodiversity in Islington is very important and trees are a consideration amongst other biodiversity. However it is noted that the provision of new trees as part of new development generally, may not always be appropriate everywhere, as the NPPF requires; “the right trees are planted in the right places”.
133	Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as <b>Building for a Healthy Life</b> . These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels.	No impact on draft Local Plan.
134	<del>Permission</del> <b>Development that is not well designed</b> should be refused for development of poor design that fails to take the opportunities available for improving	Paragraph 134 of the NPPF 2021 requires a proposal be refused unless it can be demonstrated to be an outstanding or innovative design which promotes high levels of sustainability or raises the

	<p><del>the character and quality of an area and the way it functions, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design standards or style guides in plans or</del> <b>guidance and supplementary planning documents such as design guides and codes.</b></p> <p>Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision maker as a valid reason to object to development <b>significant weight should be given to:</b></p> <ul style="list-style-type: none"> <li>• <b>development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or</b></li> <li>• <b>outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.</b></li> </ul>	<p>standard of design in the area generally so long as it fits in with the overall form and layout of its surroundings. This is concerned with policy implementation and is considered to have no impact on draft Local Plan.</p>
135	<p>Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).</p>	<p>No impact on draft Local Plan.</p>
n/a	<p><del>In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long</del></p>	<p>No impact on draft Local Plan.</p>

	as they fit in with the overall form and layout of their surroundings.	
<b>CHAPTER 14: MEETING THE CHALLENGE OF CLIMATE CHANGE, FLOODING AND COASTAL CHANGE</b>		
161	<p>All plans should apply a sequential, risk-based approach to the location of development – taking into account <b>all sources of flood risk and</b> the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:</p> <p>[...]</p> <p>c) using opportunities provided by new development <b>and improvements in green and other infrastructure</b> to reduce the causes and impacts of flooding, (where appropriate through the <b>making as much use as possible</b> of natural flood management techniques <b>as part of an integrated approach to flood risk management</b>);</p>	<p>The draft Local Plan has taken into account all forms of flood risk in the SFRA (EB11) and provided a sequential assessment of sites as part of the IIA.</p> <p>Regarding the NPPF amendments introduced at part c) green infrastructure policies within the plan (for example G1, G5 and G5 aim to enhance green infrastructure provision due to the multiple benefits it can provide including in relation to flooding. As part of policy G4, part C, Landscape Design Strategies must demonstrated Incorporation of Sustainable Urban Drainage Systems (SUDS) into the design as part of an integrated approach which maximises biodiversity and water use efficiency alongside other benefits. . This is part of an integrated approach to SUDS and works with policy S7. This approach is further supported by the amendments introduced to para 161.</p>
162	<p>The aim of the sequential test is to steer new development to areas with the lowest risk of flooding <b>from any source</b>. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.</p>	<p>The draft Local Plan has taken into account all forms of flood risk in the SFRA (EB11).</p>
163	<p>If it is not possible for development to be located in <del>zones</del> <b>areas</b> with a lower risk of flooding (taking into account wider sustainable development objectives),</p>	<p>No impact on draft Local Plan.</p>

	the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance <b>Annex 3</b> .	
166	b) the development is appropriately flood resistant and resilient <b>such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment</b> ;	No impact on draft Local Plan. Change related to implementation decisions.
<b>CHAPTER 16: CONSERVING AND ENHANCING THE HISTORIC ENVIRONMENT</b>		
176 and 177		Change not considered as unrelated to Islington
180	<b>When determining planning applications, local planning authorities should apply the following principles:</b> a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to <del>incorporate</del> <b>improve</b> biodiversity <del>improvements</del> in and around developments should be <del>encouraged</del> <b>integrated as part of their design</b> , especially where this can secure measurable net gains for biodiversity <b>or enhance public access to nature where this is appropriate</b> .	No impact on Local Plan. Change related to implementation decisions.

198	<b>In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.</b>	No impact on Local Plan. Change related to implementation decisions.
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