

DEVELOPMENT CONTROL COMMITTEE

Agenda
Item
A.2

Meeting Date: 6 November 2020
Portfolio: Economy, Enterprise and Housing
Key Decision: No
Policy and Budget Framework: Yes/No
Public / Private: Public

Title: White Paper: Planning for the Future
Report of: Corporate Director of Economic Development
Report Number: ED.41/20

Purpose / Summary:

This report sets out the Council's response to recent Government Consultation

Recommendations:

It is recommended that the report be noted.

Tracking

Executive:	
Scrutiny:	
Council:	

1. BACKGROUND

1.1 On the 6th August 2020 the Ministry of Housing, Communities and Local Government published a White Paper Planning for the Future, in which it sought views on each part of a package of proposals for reform of the planning system in England to streamline and modernise the planning process, improve outcomes on design and sustainability, reform developer contributions and ensure more land is available for development where it is needed.

1.2 In the covering foreword the Prime Minister states:

“Thanks to our planning system, we have nowhere near enough homes in the right places. People cannot afford to move to where their talents can be matched with opportunity. Businesses cannot afford to grow and create jobs. The whole thing is beginning to crumble and the time has come to do what too many have for too long lacked the courage to do – tear it down and start again.

That is what this paper proposes.

Radical reform unlike anything we have seen since the Second World War.”

He continues:

“...a whole new planning system for England.

One that is simpler, clearer and quicker to navigate, delivering results in weeks and months rather than years and decades.

That actively encourages sustainable, beautiful, safe and useful development rather than obstructing it.

That makes it harder for developers to dodge their obligations to improve infrastructure and opens up housebuilding to more than just the current handful of massive corporations.

That gives you a greater say over what gets built in your community.

That makes sure start-ups have a place to put down roots and that businesses great and small have the space they need to grow and create jobs.

And, above all, that gives the people of this country the homes we need in the places we want to live at prices we can afford, so that all of us are free to live where we can connect our talents with opportunity.

Getting homes built is always a controversial business. Any planning application, however modest, almost inevitably attracts objections and I am sure there will be those who say this paper represents too much change too fast, too much of a break from what has gone before.

But what we have now simply does not work.”

1.3 The Secretary of State in his foreword states that:

“These proposals will help us to build the homes our country needs, bridge the present generational divide and recreate an ownership society in which more people have the security and dignity of a home of their own.

Our proposals seek a significantly simpler, faster and more predictable system. They aim to facilitate a more diverse and competitive housing industry, in which smaller builders can thrive alongside the big players, where all pay a fair share of the costs of infrastructure and the affordable housing existing communities require and where permissions are more swiftly turned into homes.

We are cutting red tape, but not standards. This Government doesn't want to just build houses. We want a society that has re-established powerful links between identity and

place, between our unmatched architectural heritage and the future, between community and purpose. Our reformed system places a higher regard on quality, design and local vernacular than ever before, and draws inspiration from the idea of design codes and pattern books that built Bath, Belgravia and Bournville. Our guiding principle will be as Clough Williams-Ellis said to cherish the past, adorn the present and build for the future.

We will build environmentally friendly homes that will not need to be expensively retrofitted in the future, homes with green spaces and new parks at close hand, where tree lined streets are the norm and where neighbours are not strangers.

We are moving away from notices on lampposts to an interactive and accessible map-based online system – placing planning at the fingertips of people. The planning process will be brought into the 21st century. Communities will be reconnected to a planning process that is supposed to serve them, with residents more engaged over what happens in their areas.

While the current system excludes residents who don't have the time to contribute to the lengthy and complex planning process, local democracy and accountability will now be enhanced by technology and transparency.

Reforming the planning system isn't a task we undertake lightly, but it is both an overdue and a timely reform. Millions of jobs depend on the construction sector and in every economic recovery, it has played a crucial role."

2. PROPOSALS

2.1 The White Paper identifies a number of problems with the current planning system:

- It is too complex
- Planning decisions are discretionary rather than rule-based
- It takes too long to adopt a Local Plan
- Assessments of housing need, viability and environmental impacts are too complex and opaque
- It has lost public trust
- It is based on 20th-century technology
- The process for negotiating developer contributions to affordable housing and infrastructure is complex, protracted and unclear
- There is not enough focus on design, and little incentive for high quality new homes and places
- It simply does not lead to enough homes being built

2.2 The Government considers that the planning system needs to be better at unlocking growth and opportunity in all parts of the country, at encouraging beautiful new places, at supporting the careful stewardship and rebirth of town and city centres, and at supporting the revitalisation of existing buildings as well as supporting new development.

- 2.3 It is also time for the planning system finally to move towards a modernised, open data approach that creates a reliable national picture of what is happening where in planning, makes planning services more efficient, inclusive and consistent, and unlocks the data needed by property developers and the emerging Property Technology (PropTech) sector, to help them make more informed decisions on what to build and where.
- 2.4 The Government wishes to:
- Be more ambitious for the places we create
 - Move the democracy forward
 - Improve the user experience of the planning system
 - Support home ownership
 - Increase the supply of land available for new homes where it is needed
 - Help business to expand
 - Support innovative developers and housebuilders
 - Promote stewardship and improvement of our precious countryside and environment
 - Create a virtuous circle of prosperity in our villages, towns and cities
- 2.5 In order to do this the Government proposes to undertake fundamental reform of the planning system to address its underlying weaknesses and create a system fit for the 21st century. In order to do this there are five components:
- 2.6 First, they will streamline the planning process with more democracy taking place more effectively at the plan making stage:
- Simplifying the role of Local Plans
 - Local Plans should set clear rules rather than general policies for development
 - Local councils should radically and profoundly re-invent the ambition, depth and breadth with which they engage with communities
 - Local Plans should be subject to a single statutory “sustainable development” test
 - Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new standard template
 - Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable (of no more than 30 months in total)
 - Decision-making should be faster and more certain
 - We will seek to strengthen enforcement powers and sanctions
 - We will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms

2.7 Second, they will take a radical, digital-first approach to modernise the planning process. This means moving from a process based on documents to a process driven by data. We will:

- Support local planning authorities to use digital tools to support a new civic engagement process for local plans and decision-making
- Insist local plans are built on standardised, digitally consumable rules and data
- Standardise, and make openly and digitally accessible, other critical datasets that the planning system relies on
- Work with tech companies and local authorities to modernise the software used for making and case managing a planning application
- Engage with the UK PropTech sector through a *PropTech Innovation Council*

2.8 Third, to bring a new focus on design and sustainability, they will:

- Ensure the planning system supports our efforts to combat climate change and maximises environmental benefits
- Facilitate ambitious improvements in the energy efficiency standards for buildings
- Ask for beauty and be far more ambitious for the places we create, expecting new development to be beautiful, and to create a “net gain” not just “no net harm”
- Make it easier for those who want to build beautifully through the introduction of a fast-track for beauty
- Introduce a quicker, simpler framework for assessing environmental impacts and enhancement opportunities
- Expect design guidance and codes – which will set the rules for design of new development – to be prepared locally and to be based on genuine community involvement rather than meaningless consultation
- Establish a new body to support the delivery of design codes in every part of the country
- Ensure that each local planning authority has a chief officer for design and place-making
- Lead by example by updating Homes England’s strategic objectives to give grater emphasis to delivering beautiful places
- Protect our historic building and areas

2.9 Fourth, they will improve infrastructure delivery in all parts of the country and ensure developers play their part

- The Community Infrastructure Levy and the current system of planning obligations will be reformed as a nationally-set value-based flat rate charge
- We will be more ambitious for affordable housing provided through planning gain

- We will give local authorities greater powers to determine how developer contributions are used
- We will also look to extend the scope of the consolidated Infrastructure Levy and remove exemptions from it

2.10 Fifth, to ensure more land is available for homes and development people and communities need, and to support renewal of our town and city centre, they propose:

- A new nationally-determined binding housing requirement that local planning authorities would have to deliver through their Local Plans.
- To speed up construction where development has been permitted
- To provide better information to local communities, to promote competition amongst developers, and to assist SMEs and new entrants to the sector
- To make sure publicly-owned land and public investment in development supports thriving places

2.11 With all these points in mind , the consultation document does not address every detailed part of the planning system, its function and objectives, but rather focuses on the key reforms that can help improve the delivery and quality of homes and neighbourhoods, set within the Government's drive towards net-zero greenhouse gas emissions by 2050.

2.12 The consultation sets out three pillars of proposed changes:

Pillar One – Planning for development

Pillar Two – Planning for beautiful and sustainable places

Pillar Three – Planning for infrastructure and connected places

The consultation outlines the background to these issues and poses a series of questions.

2.13 Many of the changes in the White Paper are badged as part of a radical transformation to the process however it is worth noting that in delivering the Council's growth agenda, we have been tackling many of the issues raised by Government. Some of these do not require radical changes and working with a system that has evolved over more than 75 years can present great value in the way that the planning system operates to ensure a fair system for all parties. There are however inherent complexities of the system the Government wishes to speed up.

2.14 Members will be aware that not everyone engages fully with the current planning system until they receive notifications about planning applications on their doorstep

however recent work on St Cuthbert's Garden Village has seen many of the points being embraced; including more meaningful community engagement, improving the quality of design (planning application 19/0459 relating to land at Carleton Clinic reported to this committee, included the use of a Design Code), and the need to deliver more housing which lies at the heart of this recent consultation.

- 2.15 The radical changes look to significantly speed up the planning process. Condensing local plan preparation to 30 months and reducing the number of documents supporting planning applications for standardised national processes, raises concerns about the detailed technical supporting information that makes a plan, and subsequent applications, local. Identifying what is needed in the local area and making sure applications deal with local circumstances are fundamental to how the planning system has worked.
- 2.16 Improving engagement with local communities is welcomed so that people are more involved however as members will know we have let consultations on planning applications continue, or informed additional residents, which has impacted on the ability to quickly determine an application as people want their say and want to be heard. Will this truly happen in a speeded-up planning system from policy development through to individual applications.
- 2.17 There is also one other focus of the consultation on improving design. Everyone is aware of the cliched phrase about "beauty" and whilst we are seeking to improve the quality of design it will remain a focus of judgement where opinions will differ. Focusing on one area of development at the expense of the others may remove the real planning issues in exchange for a beauty parade and people are aware of how controversial those have become.
- 2.18 The consultation paper can be found using the following link <https://www.gov.uk/government/consultations/planning-for-the-future> . Given that the concerns of the Government relate to the whole system this is a strategic planning matter which falls to the Council's Executive/Portfolio Holder to deal with in terms of a response to the consultation. The concerns briefly outlined above have, at the time of writing this report, been worked into the Council's response which had to be submitted before the consultation end on the 29th October. The final draft is attached to **Appendix 1** of this report which includes the questions asked by Government.

3. WHAT HAPPENS NEXT

- 3.1 The government recognises that it is important that in bringing forward reform to improve the operation of the planning system, they do not cause delays to development that is currently planned.
- 3.2 Subject to responses to this consultation, they will consider the arrangements for implementing these changes to minimise disruption to existing plans and development proposals and ensure a smooth transition. This includes making sure that recently approved plans, existing permissions and any associated planning obligations can continue to be implemented as intended; and that there are clear transitional arrangements for bringing forward new plans and development proposals as the new system begins to be implemented.
- 3.3 Nevertheless, they want to make rapid progress toward this new planning system. They are already introducing a new Use Class Order, with associated permitted development rights, to make it easier for businesses to change use without the need for planning permission to support our high streets and town centres bounce back following the COVID-19 pandemic. They have also created new permitted development rights to enable more new homes to be built on top of buildings and the demolition and rebuild of vacant buildings for housing, without the need for usual planning permission.
- 3.4 Subject to the outcome of the consultation, the Government will seek to bring forward legislation and policy changes to implement the reforms. The detail of the proposals will need further development pending the outcome of the consultation and they will continue to develop the proposals as they gather feedback and views on them.
- 3.5 The proposals for Local Plan reform, changes to developer contributions and development management would require primary legislation followed by secondary legislation. The proposals allow 30 months for new Local Plans to be in place for a new planning framework, so they would expect new Local Plans to be in place by the end of the Parliament.
- 3.6 They would implement any policy changes, including to set a new housing requirement, by updating the National Planning Policy Framework in line with the new legislation.

4. CONSULTATION

- 4.1 This paper relates to the Government's consultation White Paper: Planning for the Future

5. CONCLUSION AND REASONS FOR RECOMMENDATIONS

- 5.1 The consultation covers a number of issues relating to the English planning system. Members are asked to note the Council's response to the consultation.

6. CONTRIBUTION TO THE CARLISLE PLAN PRIORITIES

- 6.1 The aims of the reforms proposed in the consultation paper will deliver more housing and a better living environment which accord with the Carlisle Plan priorities. Although there are concerns about the proposed mechanisms to do this the priorities can still be delivered under the current planning regime.

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Appendices Draft response to the consultation
attached to report:

Note: in compliance with section 100d of the Local Government Act 1972 the report has been prepared in part from the following papers:

- **White Paper: Planning for the Future**

CORPORATE IMPLICATIONS:

LEGAL – This report has been prepared so that Members can note the consultation response which has been submitted on behalf of the Council. Following the consultation, new statutes/ regulations will be produced which the Council will need to comply with and Members will receive further updates and training at the appropriate time.

PROPERTY SERVICES – n/a

FINANCE – n/a

EQUALITY – n/a

INFORMATION GOVERNANCE – n/a

PLANNING FOR THE FUTURE WHITE PAPER (AUGUST 2020)

OVERVIEW

Q1. What three words do you associate most with the planning system in England?

Consistency, certainty, clarity.

Q2(a). Do you get involved with planning decisions in your local area?

[Yes]

Carlisle City Council is the Local Planning Authority.

Q2(b). If no, why not?

[Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

n/a

Q3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future? [Social media / Online news / Newspaper / By post / Other – please specify]

By email to neil.cole@carlisle.gov.uk

Q4. What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

As the Local Planning Authority, we are required to address and balance a range of competing priorities in order to deliver sustainable growth within the City.

Specifically, we are the urban capital for Cumbria and serve the wider hinterlands of western Northumberland and southern Scotland. We want to draw from on our high quality environment to deliver high quality homes to reverse the loss of working age families (through inter alia St Cuthbert's Garden Village) in parallel with supporting continued economic growth – these will be central to the success of the Borderlands Inclusive Growth Deal and the Cumbria Local Industrial Strategy.

PILLAR 1: A NEW APPROACH TO PLAN-MAKING

**Q5. Do you agree that Local Plans should be simplified in line with our proposals?
[Yes / No / Not sure. Please provide supporting statement.]**

The Council welcomes the continued primacy to be afforded to the development plan.

We are concerned that plans should be limited to a 10 year period which could serve to stifle the growth for ambitious authorities. St Cuthbert's Garden Village is likely to entail a 30 year build out and its essential that plans are capable of providing our communities, infrastructure providers and delivery partners the long term certainty that is required to reflect both the lead in times required and the need to deliver the supporting infrastructure.

It is however concerning that the White Paper pays little regard to economic growth and Government's own Industrial Strategy and to the role of future economic growth. The proposals would appear to be moving away from spatial planning to simply becoming a housing delivery plan. As per Q4, the planning system cannot divorce the provision of homes with economic growth – as this is a key pillar towards delivering sustainable development.

With specific regards to the proposals, further clarity will be required regarding:

- Whether plans will continue to set out a spatial vision to articulate and justify the spatial patterns of growth, the rationale for the type of sites to be delivered for development and where necessary the release of 'constrained' land?*
- The need to avoid confusing and overlapping designations for sub-areas eg city centres will likely include growth areas for new retail facilities, renewal areas based on the existing uses; and protected areas such conservation areas;*
- If the White Paper requires Policies Maps to no longer show traditional "white land", is the expectation that a detailed micro-level approach is required to zone individual parcels/sub-areas with regards to the range of future uses. This will require a considerable body of work to be undertaken to ensure those sub-areas are defined accordingly in order to relate to a revised NPPF's suite of policies and/or design codes prepared locally;*
- What "gentle densification" means and how would this would be managed over larger built up areas?*
- There will still be the ability for plans to safeguard land for future potential development (eg in the context of land between the built up area and Green Belt or safeguarding the integrity of routes for long term transport investment)?*
- The future legal status of the Policies Map. Presently, these are not legally part of the development plan, yet comprise an integral visual representation of the plan with regards to the implementation of policies.*

Proposal 2: Development management policies established at national scale and an altered role for Local Plans.

Q6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

Proposals to set out a suite of national development management policies are welcomed in principle. This would avoid unnecessary repetition and ensure that plans do not become dated against potential future revisions to national policies. It is assumed that the comparable Section 38(6) clause will be amended to elevate the status of the national policies to that of the development plan.

However, we are concerned that sole reliance on a suite of national policies:

- Removes local democratic processes and the ability to influence the growth of areas at a local level;*
- Would not fully reflect the local distinctiveness of individual authorities. A one size fits all approach does not work. Hence plans are presently able to adapt and elaborate those policies set out in the existing NPPF to suit their differing local circumstances.*
LPA's should be able to justify bringing forward local policies to supplement national policies (and where necessary with supporting SPDs) to address locally specific issues or to address matters where the national policies are silent. Examples of this include: setting affordable housing requirements informed by evidence and implementing a range of measures appropriate to local circumstances to address the recreational disturbance to SPAs/SACs arising from new homes.

Proposal 3: Local Plans should be subject to a single statutory “sustainable development” test, replacing the existing tests of soundness

Q7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

Plan preparation has become bogged down with the range of technical tests. Whilst the sustainability appraisal/SEA is a valid tool, it has become overly cumbersome, lengthy and costly to prepare. Their increasing complexity further leaves plans open to legal challenge on technicalities as opposed to the integrity of the plan being brought forward. In turn, the risk of legal challenge further adds to their complexity as authorities seek to address every potential connotation (regardless of the realism).

Proposals to streamline tests are welcomed in principle, but the current proposals lack clarity to offer detailed comments as to how a single test would work and the stages at which these would need to be prepared to inform and justify plans.

Any such approach would need to be undertaken alongside reform related to how the ‘sustainable development’ test would operate, most notably in relation to how the traditional approach to the scoring of options and consideration of ‘reasonable alternatives’. The larger the scale of any local plan, the more complexity in terms of

alternative options will exist. Scoring is often subjective and simplified into a meaningless traffic light approach. Reform should ensure that a new approach avoids getting bogged down into consideration of all possible alternatives or their sustainability credentials, many of which are judgements and do not reveal much distinction between alternatives.

Specifically, it is not clear on the full range of (quasi) legal tests that would continue to under this proposal. Whilst the White Paper maintains there should be certainty around the delivery of development, it is unclear how allocations would be assessed (selected/discounted) based on their suitability, availability and viability.

Whilst the White Paper alludes to stripping down and standardising the range of evidence prepared, it should not be underestimated as to the scale of evidence that would still be needed to support the larger allocations (now to be supplemented by design codes and masterplans) to confirm the principle of development is acceptable and there is realism that sites will come forward.

It is not clear how a new sustainability test would operate in tandem with any tests around viability and delivery and how this would then relate to the implementation of the proposed consolidated Infrastructure Levy at the local level. Presumably, at the plan making stage viability must be a key consideration in order to assess the scale of infrastructure required, the masterplans and what would be secured through the Infrastructure Levy.

Q7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

The existing Duty to Cooperate is a process driven test as opposed to one which is based on outcomes. Plans have been unnecessarily withdrawn based on a breakdown in the process.

Strategic growth will inevitably require cooperation and collaboration across boundaries, with the larger sites relating closely to neighbouring areas, to wider market considerations and the provision of strategic infrastructure. Without any incentives or requirements to secure positive cooperation between neighbouring authorities there is a danger that places will be put off from thinking strategically about future growth.

A new requirement for some form of cross-boundary consideration will therefore need to be retained within the new system. This could be covered in some way through guidance related to the 'sustainable development' tests to ensure consideration of aspects which have cross boundary considerations and implications. However, failure should not be deemed as an examination 'show stopper'.

Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.

**Q8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?
[Yes / No / Not sure. Please provide supporting statement.]**

As set out at Q4, Carlisle is the sub-regional capital and our recently adopted Local Plan sets out an ambitious strategy for growth. Our Plan will be a key mechanism to realise the economic ambitions for Cumbria but also the Borderlands Inclusive Growth Deal. Delivering the 10,000 home St Cuthbert's Garden Village will deliver the required step change and sits at the heart of these ambitions. Our Plan sets pre-standard method requirement of 625 homes p.a. Since adoption, our Plan has successfully delivered a significant uplift in net completions rising from pre-adoption rates of circa 190 to 663 in 2019/20.

The existing and proposed standard methods adopts a one size fits all approach to resolving the national housing crisis. Under the existing standard method, our minimum annual need would be 193 and under the Government's latest proposals rises to only 285 homes. Neither, is supportive of our growth aspirations and could serve to undermine the basis upon which St Cuthbert's Garden Village is being brought forward. Government's proposals could simply serve to disincentivise growth and stifle market interest for authorities such as ourselves.

In common with the current methodology, we would welcome the proposition that the revised standard method should be regarded as the minimum figure to plan. We would expect that any accompanying revisions to the PPG will retain and enhance this point to make clear that ambitious authorities like Carlisle, with Garden Village status and/or Growth Deals, could and should plan for a significantly greater housing requirement. When determining housing requirements, consideration should not only be given to known 'constraints' but also 'opportunities' which may include economic potential, infrastructure investment and broader regeneration/growth related needs. Councils should be able to engage to set out their position, but this will need to be through a structured and proportionate process to that can allow for robust but streamlined cases to be made without protracted or costly evidence gathering exercises.

Furthermore, there is no incentive for authorities to plan more strategically beyond the 10 year plan period suggested by the White Paper. The planning reforms should encourage councils to think about longer term requirements.

Whilst Government has recently concluded its consultation on the revised Standard Method, we do question why the White Paper is now consulting on potential further revisions to the standard on ways upon which adjustments could then be made. Is it to be assumed that a "Standard Method 3" consultation is expected in the near future. If Government is intent that its White Paper proposals for plan making are delivered, it is essential that all parties are provided with certainty. It is imperative that any revised standard method sets out a clear and robust mechanism to enable adjustments either upward or downward that reflect local circumstances. In the short term, plan making under the proposed transitional arrangements would likely lead to abortive work for authorities (if housing requirements are likely to change in the future. This would only serve to further undermine the integrity and trust in both planning system and local planning processes.

Q8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?
[Yes / No / Not sure. Please provide supporting statement.]

With regards to affordability, it doesn't follow that building more homes improves affordability eg North West Leicestershire, Redcar & Cleveland and Northumberland have over the past 3 years delivered homes significantly in excess of the standard method requirement. Yet, under the proposed standard method, their respective needs have risen significantly. This would suggest that wider factors other than housing delivery affect affordability eg mortgage availability, the build out rates of housebuilders. It should be noted that Green Belt policy itself has served to suppress growth around existing urban areas thereby increasing demand and driving up house prices.

Whilst the affordability uplift effectively increases the housing requirement, authorities are required to release additional and more deliverable sites (either through the local plan or as a result of a failure to maintain a 5 year housing land supply). An unintended consequence is that by increasing the range of and choice of land available for development will make it less likely that the most urgent sites in need of development (eg the more difficult and less profitable brownfield sites) will be delivered. Those sites that are easier and more profitable to deliver are likely to be those that would not have been allocated at all if it wasn't for the uplift.

In the absence of the Duty to Cooperate, clarification is required as to the process by which authorities can work together to consider the potential redistribution of development needs.

Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.

Q9(a). Do you agree that there should be automatic permission for areas for substantial development (Growth areas) with faster routes for detailed consent?
[Yes / No / Not sure. Please provide supporting statement.]

Currently, the principle of development is largely established as a consequence of our planned system ie the presumption in favour of development that accords with the development plan. Whilst, this proposal would appear a logical extension, it is not clear what it would gain in practice. Developers rarely look for certainty on the point of whether 'in principle planning' should be granted and are more often concerned about the details of the proposal in relation for example to the numbers densities, scale, massing and layout. In this regard, a permission in principle is likely to be less helpful.

The 'Growth area' category and 'automatic permission' may be better related to proposals that are intended to be delivered in the early years of a plan period and in full (or

substantially) within its lifetime. It is however not suited to the needs of longer-term strategic growth, which could span several plan periods and requires flexibility to adjust to influences over time. There is just too much work to be done for the larger schemes (particularly given the proposed timeframes the White Paper suggests for plan making).

It is suggested that a further category is defined which accommodates ‘Strategic Growth’ for the largest, more strategic and complex sites which deliver later on in and/or beyond the end of a plan period. More flexibility should be introduced for these proposals so that they do not require the same level of detail or background information. Alternatively, strategic growth could be addressed through a different form of plan making at a “larger than local” scale which would leave Local Plans to focus on and address the short-term pipeline housing supply. This could encourage councils to plan strategically beyond plan periods and address concerns over the amount of work that may need to be undertaken for the largest most complex sites, the related resourcing requirements the risks this puts on achieving the ambitious plan making timescales.

It is noted under Proposal 14 that an agreed masterplan and design code are required as a pre-condition of granting this permission in principle (either in parallel with or post local plan adoption). From experience, the transition from allocation to on-site delivery requires a significant body of evidence to be front loaded into the local plan preparation stage eg the scale and cost of infrastructure and the means to deliver it. This is particularly relevant when bringing forward large sites such as St Cuthbert’s Garden Village. Otherwise, the scale of the ‘outstanding’ issues to resolve at the new application stage could become further protracted. The time required to gather the necessary evidence and masterplan/design code preparation must be reflected within the timescales at the plan making stage, particularly where there are a number of growth sites within a single plan.

However, there are concerns over how this new regime would work which could otherwise cause delays at the subsequent consenting stage:

- What is the status of the masterplans / design codes within the development process and will they be subject to public scrutiny and testing?*
- Is there an intention that masterplans / design codes are be adopted within a defined period following local plan adoption?*
- Is there intended to be a separate testing regime for masterplans / design codes – otherwise, growth area allocations would be delayed as a result in conflict and protracted negotiations between the LPA and landowners/site promoters?*
- Growth areas would typically be built out over a number of years and there must be flexibility with the policy / masterplan / design code / infrastructure levy regimes to respond to future changes.*
- The preparation of LDOs/NDOs and DCOs can themselves be protracted and it is unclear how a revised reserved matter process would work in such cases to adequately speed up the delivery of development.*

- *In the short term, many authorities lack the in-house resources to deliver these masterplans / design codes and these documents will vary significantly in terms of complexity according to the nature and scale of those locations they are intended to cover.*

Q9(b). Do you agree with our proposals above for the consent arrangements for *Renewal and Protected areas*?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

As above, this would appear to follow the existing legislative framework regarding the presumption in favour of development.

However, as detailed at Q5, clarity is required as to the nature and extent of the allocation/zoning needed to define renewal areas (ie taking a blanket overwash of built up areas and/or allocating specific sites).

With regards to the consenting regime for proposals within protected areas, the Council would refer to its response at Q6. Particularly, it is concerned that there may be situations where national policy is either silent or policies lack sufficient detail to effectively determine the proposal efficiently and whether there would remain scope to introduce locally specific policies to address either specific sites or specific themes.

Q9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

The Council would welcome the ability to explore this proposal further if it could be demonstrated that this would accelerate timescales without compromising the decision making process.

Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology

Q10. Do you agree with our proposals to make decision-making faster and more certain?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

As per our response at Q6, should a new NPPF sets out nationally prescribed development management policies, it would mean that we would have less opportunity to influence policy development at the local area level and would therefore undermine democratic processes around the determination of planning applications.

Greater clarity is required as to how proposals for a fast track consenting system to automatically permit proposals for high-quality developments where they reflect local character and preferences would work in practice.

We remain committed to working with applicants to deliver good design and a sustainable development approach in line with planning policy within the 8 or 13 week targets.

However, it cannot be automatically assumed that applications are fit to be determined at the point of submission. Many will require further work to bring them in line with policy (whether set nationally or locally) which are formally agreed though an extension of time. If these targets are to become firm deadlines and in the absence of an extension of time system to determine the application, we are concerned that the decision making process will become more binary with more applications being refused (simply to hit the target) with a higher volume of appeals against these decisions to the Planning Inspectorate.

Whilst we welcome digital improvements to manage applications, we still deal with some residents who don't have a computer and don't engage digitally with the current system and we need to ensure that they are not disenfranchised from planning processes. They engage following receipt of the neighbour notification letter or site notice. Whilst costly, we still need to be able to work in formats that meet the needs of local residents. The difficulty is not knowing which residents fall into this category in advance and we shouldn't sacrifice them for quick digital hits.

Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.

**Q11. Do you agree with our proposals for digitised, web-based Local Plans?
[Yes / ~~No~~ / ~~Not sure~~. Please provide supporting statement.]**

In principle, these proposals are supported, though this along with the Governments wider ambitions for reinventing how authorities engage with communities will often require further investment in time and resources.

A STREAMLINED, MORE ENGAGING PLAN-MAKING PROCESS

**Q12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?
[Yes / ~~No~~ / ~~Not sure~~. Please provide supporting statement.]**

It is considered that both a 30 month adoption cycle and having these new style plans in place before the close of this Parliament are unrealistic for this first generation of new style plans. As detailed within our wider responses, there remains a series unresolved issues:

- A clear timetable for the implementation of primary and secondary legislation alongside a revised NPPF with a clear suite of national development management policies would enable LPAs to effectively project manage the transition from the existing to new style system.*
- What a revised sustainability test would include and the level of detail required*
- Implementation of the proposed new standard method alongside what is presently an unknown approach to making adjustments for land constraints.*
- Whether transitional arrangements will be introduced to allow emerging plans to 'migrate' to a later stage of the new style of plan rather than start from the beginning.*

- *The preparation of inter alia design codes and masterplans will be resource intensive where few authorities presently have the technical capacity to deliver these in-house;*
- *Account of democratic approvals needs to be taken which can and some cases take 2-3 months to secure approvals. This is in addition to seasonal limitations around when consultations can be undertaken (if there is to be a “best in class” style consultation) and would there continue to be a requirement to maintain a Statement of Community Involvement?*

Specifically with regards to Proposal 8:

Stage 1: *It is assumed this comprises what is presently a basic issues and options stage – though it is assumed this would require preparing advanced baseline evidential work to inform this stage and the options available? Further clarity is sought as to what is considered to be “best in class ways of achieving public involvement”?*

Stage 2: *Depending on the nature and complexity of the constraints and land supply opportunities and any parallel preparation of design codes and masterplans, experience shows this would take far longer than 12 months. From our experience with St Cuthbert’s Garden Village in terms of developing the baseline evidence, the master planning, infrastructure requirements, etc has taken 3 years to date.*

Stage 3: *This comprises the only first real opportunity for all parties to consider and respond to the proposals and range of evidence within a 6 week period. Regardless of any “best in class” engagement undertaken this leaves little time for respondents to effectively engage in the process. Given that adoption could equate to an automatic grant consent for ‘growth’ sites, communities would continue to feel disaffected and even more distrustful of the planning process.*

This stage relies upon statutory consultees submitting comments within 6 weeks which can be challenging.

Proposals to limit the word count for responses is welcomed, but from experience, the time taken to progress from one consultation to the next will be influenced by the scale and complexity of representations submitted. It is invariably a highly resource intensive process to log in and analyse comments and can considerably slow down a plan’s advancement. The 9 month window for this stage is questionable.

The simultaneous consultation and submission gives little scope for modifications to be made to a plan’s proposals (at a pre or post examination stage). This would lead to an unnecessarily protracted and complex examination process.

It is also unclear as to what role the examination will have Inspector’s currently do what is permissible to make plans sound (which can include directing the authority to undertake additional work to make them sound). If the 9 month window is fixed, it would suggest the Inspector’s role could simply be confined to a straight pass or fail. The consequence being that far more plans could be withdrawn.

Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools

Q13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

It is unclear what the future role will be for neighbourhood plans within a “zonal” “compliance” based approach to plan making. It is assumed they would have no role with regards to allocating strategic scale “growth areas” or designating nationally protected areas and this needs to be clarified.

The White Paper clearly states that design codes should be prepared by authorities or land promoters. No reference is made to the role of neighbourhood plans. As per Q6, it is further unclear as to whether there is a role for neighbourhood plans to introduce locally specific development management policies to supplement those to be set out nationally.

Clear guidance will be required to the future status of existing and emerging neighbourhood plans prepared prior to the implementation of these proposed reforms.

Q13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

See Q13(a).

Proposal 10: A stronger emphasis on build out through planning

Q14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

Whilst the principle of the proposal is welcomed, there is concern that this lacks sufficient detail to be fully responded to.

To increase build out rates by increasing the range of outlets would also put pressure on the need to deliver the necessary supporting infrastructure in time to support those homes built. As at Q22(d), the Council is concerned that if the Infrastructure Levy is payable at the point of occupation, increasing the rate of build out would further pressure the public purse to front load delivery of the infrastructure to then support delivery of the homes. In those instances where authorities decide not to take on that risk, sites will simply fail to come forward as planned.

However, the White Paper is silent on delivery vehicles. This is particularly important as the reforms are increasing pressure on the public sector to streamline the process yet provides them with no tangible tools to intervene should it be necessary to ensure that the private sector then delivers. The same intent has been behind previous planning reforms and has not led to a step-change in housing supply.

Complementary proposals should provide Councils with credible mechanisms to intervene where the market fails to deliver. For larger proposals, this should include strengthening the ability to establish Development Corporations with suitable planning and delivery powers. This ability already exists through various routes – Secretary of State, Mayoral or the relatively recent Locally led approach. However, the mechanisms have been seldom deployed, and never for greenfield large-scale new settlements (since the post war New Town programme).

The barriers to take up will need to be addressed. Clearer guidance is needed around the ability to acquire land at 'no-scheme' world values (and to reconsider issues related to how market value including hope value form part of this assessment). Councils willing to take such a proactive approach will need to have access to appropriate funding to both support places with pre-establishment feasibility/revenue costs in preparing business cases, site specific planning and related legal work, as well as access to the large capital costs that can address the cashflow challenge relating to site wide land acquisition (via negotiation or CPO) and the provision of initial enabling infrastructure. Without such funding support, it is difficult to envisage local partners being able to rise to the challenge.

Pillar Two – Planning for beautiful and sustainable places happened recently in your area?

Q15. What do you think about the design of new development that has happened recently in your area?

~~[Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]~~

As the LPA, we receive proposals of varying design quality and can often find these get watered down after the initial permission particularly cutting construction costs and changes in materials. This can happen at all scales from householders who can't afford their slightly ambitious extensions to larger developers who start to remove architectural details and change boundary treatments. All these components reduce the design quality and some measure to reduce the opportunity to do this would be welcomed if we are reinforcing design principles nationally.

Q16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

As the LPA, our priorities remain towards the delivery of sustainable development and strike the necessary balance between social, environmental and economic objectives.

Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.

Q17. Do you agree with our proposals for improving the production and use of design guides and codes?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

Again, whilst the Council is supportive of the move towards raising the profile of design within the decision making process, we are concerned as to how these proposals are to be implemented:

- If it is proposed that design codes are to be more binding, is it to be implied they will be afforded the weight of development plan policy or greater weight than a standard SPD? Given their elevated role clarity is required as to the preparation requirements including the scope to challenge and formally test (given these potentially could give rise to viability considerations).*
- Authorities such as ourselves no longer have an in-house design capacity and there are concerns with regards to pace at which these proposals will be implemented in the short term.*

Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.

Q18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

This is supported.

Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.

Q19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

This is supported.

Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.

Q20. Do you agree with our proposals for implementing a fast-track for beauty?

[~~Yes / No /~~ Not sure. Please provide supporting statement.]

The Council supports the objective of incentivising good design, though it has concerns regarding the lack of detail within the proposals:

- *Under the first limb, it suggests schemes will have a positive advantage and greater certainty about their prospects of swift approval where they comply with design guides and codes. Would this mean that proposals that comply with pre-set design parameters have a positive advantage over wider policies of non-compliance? This is particularly valid with regards to windfall schemes, where there they be legitimate concerns from both the LPA and communities regarding primarily the principle of development first and foremost. This could again undermine democratic accountability within the decision making process.*
- *What would the new mechanisms to fast track proposals and how would this compare to the determination of standard proposals?*
- *Under the second limb, clarity is required regarding the preparation of masterplans and design codes. Is it to be assumed these will be afforded the weight of SPD? If prepared in parallel with the local plan, will they be subject to scrutiny at examination? If as is suggested, these can also be prepared by the site promoter, clarification is required as to its status and whether any prior approval/consultation is required by the LPA?*

Pillar Three – Planning for infrastructure and connected places

Q21. When new development happens in your area, what is your priority for what comes with it?

[More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment]

As the LPA, it is our role to ensure that all of the necessary infrastructure can be viably be delivered on time to support the new development.

Dependent on the timing and funding sources available to the LPA, the priorities can evolve and change. The Infrastructure Delivery Plan [IDP] is the key document which identifies what and when infrastructure is required to support new development and is a living document.

Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.

Q22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

[Yes / No / Not sure. Please provide supporting statement.]

It is accepted that the current regime is not operating effectively. A Levy based upon the end development value secured is welcomed though it remains unclear as to how this would operate against land values within the north east and the impact this would have on liability.

This is particularly concerning as it would appear the White Paper is proposing the tests around deliverability and viability are to be less onerous which would create issues for the effective infrastructure planning process.

Presently, we intend to reserve our judgement until there is a clearer understanding of what the threshold will be and how it will achieve land value capture especially in connection with the higher infrastructure asks relating to new Garden Communities. To use this as the only means to collect developer contributions in areas where development values are relatively low in comparison to elsewhere in the country may not achieve Government's objectives of reducing the reliance on public sector intervention. This is a very simplistic view which is based on the idea that 'one size fits all. However, simplifying the process in which a levy is set is to be welcomed as establishing and reviewing a CIL charging schedule is currently a very time consuming and expensive exercise for LPAs to undertake.

The Planning White Paper Feb 2017 'Fixing Our Broken Housing Market' referred to the independent review which was published alongside that white paper. This advocated a twin track system of a low level Local Infrastructure Tariff [LIT] combined with Section 106 agreements for larger sites along with other recommendations regarding exemptions and vacant credit etc. This approach allowed for all development to contribute to infrastructure, but for additional funding to be secured on the larger, more viable sites. It also addressed the issue of timing. CIL takes several years to accumulate sufficient funds to deliver infrastructure, while S106 allows for funding in a more timely manner.

Q22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

~~[Nationally at a single rate / Nationally at an area-specific rate / Locally]~~

Development values will vary significantly across regions and even local authority areas. Equally, the nature and range of infrastructure requirements will vary on a site by site basis and will accordingly impact on viability at a local level. This must be reflected within any future levy.

Care will be needed when setting rates to consider how the needs of the larger sites which will have particular infrastructure issues and considerations. Such sites may need to be either be exempt from any general Infrastructure or the flexibility should be retained for additional requirements to be captured using S106 or an equivalent mechanism.

Q22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?

~~[Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]~~

If as the White Paper alludes, there is an expectation that the burden of implementing these proposals would fall to the applicant/developer as opposed to the public purse. Though it remains unclear as to whether this would be secured through higher application fees or through the Levy. It would therefore seem reasonable that the Levy should capture a high value. However, there is concern that in areas such as the north east, land values are typically low and viability continues to remain an issue to secure the basic infrastructure requirements. Therefore, a balance has to be struck to ensure that any future Levy maintains flexibility to ensure that development is not unnecessarily stifled.

Q22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

[~~Yes / No / Not sure.~~ Please provide supporting statement.]

The Council is concerned that payments would be paid upon the point of occupation. This wrongly assumes that all applicants will have cashflow issues that prohibit Levy payments at the point of the consent and all proposals have short term negative land values. Under these provisions it would appear that councils will take on the responsibility for delivering any advanced infrastructure works. This would require councils to adopt a high risk strategy and take on the financial risks of borrowing over multiple occasions especially where there is no guarantee that the land values will be realised at the point of occupation to secure the return on that borrowing. This is at a time when authorities have and will continue to be under significant financial pressures. This could leave councils reluctant to borrow when they do not really know what monies they can expect when considered against the risks that:

- *Development does not happen*
- *Sales are depressed and income slows to a level that does not meet repayments*
- *There is an assumption that development value will increase, whilst in reality these can also decrease (thereby reducing anticipated income)*
- *The high burden of administration for a levy to be paid upon occupation of each individual dwelling as the White Paper implies*
- *If, on occupation does the liability become the occupier as at that point the developer has transferred ownership*
- *In lower value areas such, the proposed Levy would secure a much smaller pot and the cost of providing infrastructure may not necessarily be reflected in that lower receipt.*

It is suggested that there should be a presumption that payments are paid at the point of consent, followed then by a regime that allows for a more flexible payment mechanism where it can be demonstrated that developer cash flow is an issue. Over longer build out periods (especially for Growth areas), the Levy should include a review mechanism to capture changes in values as schemes progress.

Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights

Q23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

[Yes / ~~No~~ / ~~Not sure~~. Please provide supporting statement.]

This is welcomed in order to capture the infrastructure needs that would inevitably arise from those currently exempt developments. It is essential that all development contributes proportionately to all infrastructure which supports the development. The removal of all exemptions should be considered. This would improve levels of income especially in the more rural areas of the country where self/custom build features more strongly and will become a greater feature within local plans as more are updated to include specific policies to encourage this type of development. For example, this Council consented a highly acclaimed development of around 1,900 new custom/self build and affordable dwellings. If it had been developer led, it would have been exempt from developer contributions under this proposal but there is still a requirement for significant infrastructure.

Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision

Q24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

[Yes / ~~No~~ / ~~Not sure~~. Please provide supporting statement.]

It is considered that on-site provision of affordable housing should remain the starting point for any proposal. There is concern that in-kind payments could lead to a reduction in the number of affordable homes built particularly where there are wider land supply constraints within the locality or where a greater proportion of the in-kind payment is used to assemble land (as opposed to build the homes). Securing Affordable housing through S106 agreements allows the mechanism to ensure that affordable housing secured in perpetuity. Other mechanisms will need to be identified to ensure that stock of affordable housing is allowed to diminish.

Q24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?

[Yes / No / Not sure. Please provide supporting statement.]

See Q24(d)

Q24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

[Yes / No / Not sure. Please provide supporting statement.]

See Q24(d)

Q24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?
[Yes / No / Not sure. Please provide supporting statement.]

This is a JOINT response to Q24(b) to (d). Great clarity is required for these proposals regarding:

- *At what stage in the planning process is the opportunity to resolve these matters?*
- *How does the provision of affordable homes fit in to the determination of planning as a material planning consideration?*
- *If councils are to mandate on-site delivery, can this still be negotiated away by viability arguments?*
- *If on-site delivery is not mandatory, how can councils set any policy levels for affordable housing if on-site delivery is down to being an incentive to reduce the infrastructure levy?*
- *The White Paper suggests councils can specify the forms and tenures for on-site delivery – is the expectation that there will be a standardised approach –either nationally or locally with regards to tenures?*
- *With regard to the potential ability to flip back on-site units to the developer if the market is such that the in-kind value is greater than the Levy's liability: who and when would make the decision be made? What if the council has nominated a RP who is under contract with the developer?*
- *If its accepted that low value areas will generate lower Levy receipts, how would councils be able to secure enough affordable housing in addition to the wider infrastructure requirements.*

Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy

Q25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

[Yes / No / Not sure. Please provide supporting statement.]

There is concern about widening scope of Levy spend which could be used for non-infrastructure projects and developments could be delayed due to wider priorities of those authorities.

Q25(a). If yes, should an affordable housing 'ring-fence' be developed?

[Yes / No / Not sure. Please provide supporting statement.]

See Q25.

EQUALITIES IMPACTS

Q26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

The Council has no view in this regard.