

Response ID ANON-SNQ4-RT3D-3

Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system
Submitted on 2024-09-13 16:58:02

Scope of consultation

Respondent details

a What is your name?

Name:
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b What is your email address?

Email:
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c What is your organisation?

Organisation:
Claygate Parish Council [Surrey]

d What type of organisation are you representing?

Neighbourhood planning body, parish or town council

If you answered "other", please provide further details:

Chapter 1 – Introduction

Chapter 2 – Policy objectives

Chapter 3 – Planning for the homes we need

1 Do you agree that we should reverse the December 2023 changes made to paragraph 61?

Yes

Please explain your answer:

We do not object to the reversal subject to clarity on what will be considered exceptional circumstances. In particular

- i. local planning authorities must be able to justify a lower housing requirement than the standard method to assess housing needs on the basis of local constraints on land and delivery subject to satisfactory evidence
- ii. local planning authorities should be able to take account of current and future demographic trends that can be clearly demonstrated
- iii. further guidance is needed on specific circumstances when data used in the standard method to assess housing needs is not available.

We also believe clarity is required regarding further guidance on specific circumstances when data used in the standard method to assess housing needs is not available.

2 Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

No

Please explain your answer:

We disagree as we believe that housing needs are influenced by current and future demographic trends, so this should be taken into account provided these exceptional circumstances can be clearly demonstrated.

3 Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Not Answered

Please explain your answer:

4 Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

No

Please explain your answer:

We disagree as we believe it is important to support the preservation of the distinct and consistent character of an area and therefore we oppose the removal of NPPF 130, as this would allow unsightly over-dense developments in order to meet targets.

5 Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes

Please explain your answer:

We agree as it could lead to a more rational organisation of land use, balance development demands with environmental protection, and meet social and economic objective.

6 Do you agree that the presumption in favour of sustainable development should be amended as proposed?

Yes

Please explain your answer:

7 Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

Not Answered

Please explain your answer:

8 Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

No

Please explain your answer:

We disagree as we believe that ignoring previous oversupply could lead to overdevelopment.

9 Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

Not Answered

Please explain your answer:

10 If Yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

Not Answered

Please explain your answer if you believe a different % buffer should be used:

11 Do you agree with the removal of policy on Annual Position Statements?

Not Answered

Please explain your answer:

12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Not Answered

Please explain your answer:

13 Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Not Answered

Please explain your answer:

14 Do you have any other suggestions relating to the proposals in this chapter?

Please provide any other suggestions relating to the proposals in this chapter. :

Chapter 4 – A new Standard Method for assessing housing needs

15 Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

Not Answered

Please explain your answer:

16 Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

Not Answered

Please explain your answer:

17 Do you agree that affordability is given an appropriate weighting within the proposed standard method?

Not Answered

Please explain your answer:

18 Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Not Answered

Please explain your answer:

19 Do you have any additional comments on the proposed method for assessing housing needs?

Please provide any additional comments on the proposed method for assessing housing needs.:

Chapter 5 – Brownfield, grey belt and the Green Belt

20 Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes

Please explain your answer:

We support the amendment to NPPF 124c, to strengthen the priority given to Brownfield sites.

21 Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

No

Please explain your answer:

We disagree with relaxation of restrictions that currently apply to limited infilling in the Green Belt as we believe that openness of the Green Belt is essential.

We agree with assessing "Previously Developed Land" first, provided it is in a sustainable location with necessary utilities on site or nearby and access readily available.

22 Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Please provide any further views:

We strongly believe in food security and therefore would not agree with the repurpose of glasshouses or polytunnels unless they have laid dormant for a reasonably long period of time.

23 Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

No

Please explain your answer:

We believe that the definition should add that the land is in a sustainable location as well as making a limited contribution to the Green Belt's purposes.

24 Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Yes

Please explain your answer:

A duty should be imposed on owners of Green Belt land to maintain it in good condition for agricultural and environmental/biodiversity purposes. It is, for example, all too easy for landowners to 'overlook' deteriorating drainage and/or the growth of plants like ragwort, causing pasture to degrade.

25 Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Yes and it should be contained within the NPPF

Please explain your answer:

The definition of land making a limited contribution to Green Belt purposes should be included in the NPPF, to give it a strong legal basis.

26 Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Yes

Please explain your answer:

We propose amendments to the suggested definitions as follows:-

Land which makes a limited contribution to the Green Belt purposes will:

a) Only weakly perform against any Green Belt purpose; and

b) Have at least one of the following features:

i. Land containing substantial built development or which is fully enclosed by built form

ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another

iii. Land which is dominated by urban land uses, including physical developments, whether derelict or in use

iv. Land which contributes little to preserving the setting and special character of a historic town,

provided that weakly performing areas of Green Belt which are critical to preventing the merging of neighbouring settlements will not be classified as Grey Belt.

We consider that the NPPF should contain a clear definition of "weakly performing Green Belt". We suggest something along the following lines:-

Weakly performing Green Belt is a parcel or parcels of land, which is:-

(i) enclosed by one distinct built up area or(ii) does not provide a gap between any settlements and makes no discernible contribution to separation and (iii) contains more than 15% built form, including ruined or derelict structures.

27 Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

No

Please explain your answer:

28 Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

Yes

Please explain your answer:

We support in principle the concept of a sequential test approach to selecting sites for development, except that "higher performing Green Belt sites" should only be taken into account where "very special circumstances" apply.

29 Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Not Answered

Please explain your answer:

We support in principle the concept of a sequential test approach to selecting sites for development, except that "higher performing Green Belt sites" should only be taken into account where "very special circumstances" apply. However, the word "fundamentally" should be deleted. No land should be released if to do so would in any way undermine the purpose of the Green Belt.

30 Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

No

If not, what changes would you recommend?:

More caution is needed around the release of Grey Belt land in decision making, given the pressures that can be exerted on Planning Authorities. In any case, all 'Golden Rules' should be applied. We do not think the exception that "there is a demonstrable need for land to be released for development of local, regional or national importance" should be included in NPPF 152b.

We also have detailed drafting comments on new NPPF paras 151-153:-

1. Paragraphs 151-153 (new numbering) of the NPPF set out a number of cases where development on the Green Belt should not be considered inappropriate, and should not therefore be required to satisfy the "very special circumstances" test. The drafting of these paragraphs is therefore particularly important to ensure that interpretation of these exceptions by planning officers, and by inspectors and the courts on appeal, does not result in the exceptions being wider than is intended.
2. Paragraphs 151 (apart from sub-para (g)) and 153 are unchanged from the current version of the NPPF, and there are already precedents to help with their interpretation. Para 152 is new, and the drafting is far from clear. For housing, commercial and other development in the Green Belt not to be regarded as inappropriate, three conditions are given. Condition (a) itself consists of three cumulative conditions, all of which have to be satisfied. It is joined by "and" to condition (b) which also consists of three conditions, this time apparently alternatives (though this would be made clearer if there was a semi-colon after "paragraph 76)", as there is after "three years" two lines below). It seems therefore that para 152 is satisfied if all three of the conditions in (a) and at least one of the conditions in (b) is satisfied. This seems to accord with para 19 of the Consultation Paper.
3. But what then of provision (c) – "Development is able to meet the planning policy requirements set out in paragraph 155"? It is free-standing, not joined to (a) and (b) by either "and" or "or". Is para 152 satisfied if only condition (c) is satisfied? Presumably not, since the result would be that any development meeting the planning policy requirements set out in para 155 would be appropriate in the Green Belt, which would become virtually unprotected.
4. Is 152(c) then intended to be a condition supplementary to (a) and/or (b)? – and if so, is it additional (cumulative) or alternative? If it is intended to be a further mandatory condition, like the three in (a), why is it not simply included in (a)?
5. The third condition in para 152(a) is that "the development would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole". The same wording is used in para 19 of the Consultation Paper. What is the significance of "fundamentally"? Is the condition satisfied if the development undermines the function of the Green Belt across the area of the plan as a whole, but only partially? I suggest that "fundamentally" serves only to confuse the issue, and should be deleted.

31 Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Yes

Please explain your answer:

We agree provided the local planning authority has the discretion to prioritise use of such land between housing, commercial or mixed developments. See also our response to Q30.

32 Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

Yes

Please explain your answer:

We believe additional safeguards are required to prevent excessive concentration of travellers sites in one area especially on cross border boundaries.

33 Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

Yes

Please explain your answer:

As Travellers are transient by nature, guidance on the assessment of need would be helpful.

34 Do you agree with our proposed approach to the affordable housing tenure mix?

Not Answered

Please explain your answer:

35 Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

Not Answered

Please explain your answer:

36 Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Yes

Please explain your answer:

We support the proposals for public access to green spaces.

37 Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

Not Answered

Please explain your answer:

38 How and at what level should Government set benchmark land values?

Please explain your answer:

39 To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

Not Answered

Please explain your answer:

40 It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Please explain your views on this approach:

41 Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

Not Answered

Please explain your answer, including what support you consider local authorities would require to use late-stage viability reviews effectively:

42 Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

Yes

Please explain your answer:

Golden Rules should apply to all types of development.

43 Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

Yes

Please explain your answer:

We believe that the "Golden Rules" should apply to all major developments.

44 Do you have any comments on the proposed wording for the NPPF (Annex 4)?

Not Answered

Please explain your answer:

45 Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

Yes

Please explain your answer:

We believe that private landowners should have sufficient incentive to sell if this land is not being maintained or is unprofitable rather than leaving it fallow and waiting for it to be compulsorily purchased. This is less likely to happen if benchmark land values are set, especially if they are set too low. We believe that a longer term strategy for state owned or crown estate owned Green Belt property is required. Any financial benefit arising from a completed development should be shared between the local planning authority/combined authority/Homes England and the developer.

46 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

We believe that the present system that requires developers to contribute to infrastructure through planning conditions, section 106 agreements and a community infrastructure levy is more equitable and less likely to lead to delays than the imposition of benchmark land values especially when capital gains tax is taken into account.

Chapter 6 – Delivering affordable, well-designed homes and places

47 Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Not Answered

Please explain your answer:

48 Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Not Answered

Please explain your answer:

49 Do you agree with removing the minimum 25% First Homes requirement?

Not Answered

Please explain your answer:

50 Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

Not Answered

Please provide any further comments:

51 Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Not Answered

Please explain your answer:

52 What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Please explain your answer:

53 What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Please explain your answer:

54 What measures should we consider to better support and increase rural affordable housing?

Please explain your answer:

55 Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Not Answered

Please explain your answer:

56 Do you agree with these changes?

Not Answered

Please explain your answer:

57 Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

Not Answered

If Yes, what changes would you recommend?:

58 Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Yes

Please explain your answer :

In our experience small sites that have planning permission are not being built on, especially for social housing. This is presumed to be due to lack of available funds and a focus on areas that provide most profitability. We also believe that developers are applying for permission on small sites for non-social housing alongside an application for social housing somewhere else, so that they have a fully balanced allocation of social and non-social housing in one application and can therefore build the social housing on larger more profitable sites in other parts of our borough. The smaller sites are then left to not be developed soon. This is a concern for us as we believe we also need social housing in our part of the borough on some of our smaller sites.

59 Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

No

Please explain your answer:

It may have been a mistake to add the words "beauty" and "beautiful" to the NPPF in 2023, but we fear that the deletion of these words may be taken to mean that beauty is no longer to be a relevant factor in planning.

60 Do you agree with proposed changes to policy for upwards extensions?

No

Please explain your answer:

We consider that the current safeguard, "where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene" should be retained in full, to maintain a consistent street scene where possible.

61 Do you have any other suggestions relating to the proposals in this chapter?

No

Please explain your answer:

Chapter 7 – Building infrastructure to grow the economy

62 Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Not Answered

Please explain your answer:

63 Are there other sectors you think need particular support via these changes? What are they and why?

Not Answered

Please explain your answer:

64 Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

Not Answered

Please explain your answer:

65 If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

Not Answered

If Yes, what would be an appropriate scale? :

66 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 8 – Delivering community needs

67 Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Yes

Please explain your answer:

We very much agree that there should be fuller consideration of new, expanded or upgraded public service infrastructure at the beginning of planning for new development, well before any applications are submitted.

68 Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Not Answered

Please explain your answer:

69 Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Not Answered

Please explain your answer:

70 How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Please explain your answer:

71 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

We are surprised there is no amendment to existing NPPF Para 92 on pubs and assets of community value, given that this was in the King's Speech. We would welcome any measures that allow organisations in the community to purchase an asset which has stood empty for numerous months.

Chapter 9 – Supporting green energy and the environment

72 Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Not Answered

Please explain your answer:

73 Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Not Answered

Please explain your answer:

74 Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Not Answered

Please explain your answer:

75 Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Not Answered

Please explain your answer:

76 Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Not Answered

Please explain your answer:

77 If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Please explain your answer:

78 In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Please explain your answer:

79 What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Please explain your answer:

80 Are any changes needed to policy for managing flood risk to improve its effectiveness?

Yes

Please explain your answer:

It seems to us that, given the increasing severity of flooding in this country, no development should be permitted in areas defined as being subject to the highest risk. The wording of NPPF 160 needs strengthening.

We are puzzled by some of the Flood Risk Vulnerability Classifications (NPPF Ann. 3). Water and sewage treatment works should surely count as "Essential Infrastructure" and not classed as Less Vulnerable, given their susceptibility to hazardous contamination during flooding.

81 Do you have any other comments on actions that can be taken through planning to address climate change?

Not Answered

Please explain your answer:

82 Do you agree with removal of this text from the footnote?

No

Please explain your answer:

We believe that the availability of agricultural land for food production should be an explicit consideration in determining if sites are appropriate for development.

We therefore consider the footnote to NPPF 181 should be retained in full, to maximise protection for productive agricultural land.

83 Are there other ways in which we can ensure that development supports and does not compromise food production?

Not Answered

Please explain your answer:

84 Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Yes

Please explain your answer:

85 Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Not Answered

Please explain your answer:

86 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

We consider that chapter 15 of the NPPF should be amended to make it clear that, except for small-scale hydro-electric schemes utilising existing or refurbished dams and reservoirs, Green Energy installations will not be permitted adjacent to housing or schools, in National Parks, the Norfolk Broads or

Areas of Outstanding Natural Beauty (National Landscapes). Furthermore, solar farms should not be permitted adjacent to footpaths or bridleways, or within 400m of an OS-designated view point. We consider incentives to provide solar farms at out-of-town locations on commercial and industrial buildings such as warehouses and shopping centres is far more appropriate than on Green Belt land that can be used productively to provide food security.

Chapter 10 – Changes to local plan intervention criteria

87 Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Not Answered

Please explain your answer:

88 Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Not Answered

Please explain your answer:

Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

89 Do you agree with the proposal to increase householder application fees to meet cost recovery?

Not Answered

Please explain your answer:

90 If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

Not Answered

If Yes, please explain in the text box what you consider an appropriate fee increase would be. :

91 If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Not Answered

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.:

92 Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your answer:

93 Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your reasons and provide evidence on what you consider the correct fee should be:

94 Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

Yes

Please explain your answer:

We believe that each local planning authority should be able to set its own (nonprofit making) planning application fee.

Staff and accommodation costs vary between different local planning authorities, so fees should reflect these differing costs consistent with this service being a non-profit service.

95 What would be your preferred model for localisation of planning fees?

Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.

Please give your reasons in the text box below:

96 Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

Not Answered

If Yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development? :

97 What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

Please explain your answer:

98 Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Not Answered

99 If Yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Please explain your answer:

100 What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Please explain your answer:

101 Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

Please explain your answer :

102 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer.:

Chapter 12 – The future of planning policy and plan making

103 Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

No

Please explain your answer:

We disagree with the proposed transitional arrangements.

We do not believe that local planning authorities should be required to revise their plans if they have reached Stage 3 of examination of their Plans. We are doubtful if Planning Authorities should ever be required to start on a new Local Plan immediately after the adoption of a Plan under the exiting NPPF, given the resource implications of Local Plan development.

104 Do you agree with the proposed transitional arrangements?

Not Answered

Please explain your answer:

105 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 13 – Public Sector Equality Duty

106 Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

Please explain your answer:

Protected Characteristics. At present features like step-free access to public houses for disabled people are the subject of Building Regulations, but not necessarily part of the planning stage. We think consideration should be given to making such matters a part of the planning process requiring approval at an earlier stage than at present.

Chapter 14 – Table of questions

Chapter 15 – About this consultation