

## **Appendix 1 – Proposed NPPF Consultation Response**

### **Government consultation on the proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system**

#### **Link to consultation page:**

<https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

#### **Link to government’s consultation questions:**

<https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

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

#### **Question 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?**

First and foremost, the NPPF could and should say more about how and where the Government’s national housebuilding objectives should be met, rather than relying on a formula that is not sustainably deliverable in many areas where current growth pressures are highest. It would be helpful to include in the NPPF a high-level positive strategy (i.e. a national spatial plan) that better aligns the provision of homes and other development with where the sustainable opportunities genuinely exist. Failure to do this represents a significant risk to the government’s objective of significantly increasing housing supply. This is because authorities like New Forest District Council, whom have been attributed a notional housing need which is nearly three times it’s adopted local plan requirement, yet are significantly constrained by policies that seek to protect areas or assets of particular importance (as per paragraph 11 (b) & footnote 7 of the NPPF), will be required to demonstrate it’s limited capacity to meet this need through the local plan making process prior to then in engaging in strategic planning with other authorities to seek to address this need. This issue is particularly exacerbated in coastal local authorities. Such processes are by their very nature lengthy and the risk to national policy objectives could be reduced by more proactive direction from the government in directing growth needs to those areas most able to accommodate them.

Retain wording in Para. 60 of the existing NPPF “to meet as much of an area’s identified housing need as possible” as this reflects situations where constraints may prevent meet need in full.

In terms of the precise proposed changes to paragraph 61 and 62 of the NPPF, it could be argued that the issue here is not so much the proposed reversal/deletion of the wording rather the fact that the standard method proposed is simply not appropriate nor an objective assessment of housing need (see answers to questions 15, 16 and 19 for the detailed explanation for why the proposed standard method is not considered to be the most appropriate approach). The previous and current wording setting out the context on where the use of alternative approaches to assess housing needs may be appropriate was never particularly clear, and arguably created uncertainty within the planning system as to what would constitute exceptional circumstances and what figure was / should be used as the need figure for an area. Similarly, removing wording on the outcome standard method being 'an advisory starting point' probably makes the NPPF as a whole more consistent with itself, provides greater clarity as to what is the expectation regarding plan-making and of itself, is not necessarily a fundamental shift.

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

No comments.

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

This proposed reversion is supported, noting that the NPPF as otherwise presented and considered as a whole provides an appropriate basis for ensuring that character and density are taken into account in considering development proposals and in potentially preparing future design codes.

**Question 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?**

Generally, agree that this should represent the focus of design code work in the first instance, noting that many authorities have yet to commence the formal preparation of design codes and have limited resources to do so. It is considered important to ensure that the NPPF also provides sufficient flexibility for the preparation of design codes in other areas, noting for example the enthusiasm for design codes in some neighbourhood planning groups.

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

Yes. The amendment of part of criterion (d) which removes "which are most important for determining the application" and specifies that this relates to policies "for the supply of land" is useful as it removes a degree

of ambiguity and the scope for legal discussions on 'importance' during the application process and during any subsequent appeals.

**Question 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?**

In summary, it is considered that local planning authorities without an up-to-date Local Plan in place should be required to continually demonstrate five years of specific, deliverable sites for decision making purposes. However, it is not considered that local planning authorities who have an up-to-date Local Plan should be required to continually demonstrate a five-year housing land supply as this risks undermining recently adopted Local Plans that have been found sound and reducing public trust and confidence in the plan-led system.

It is considered that local planning authorities without an up-to-date Local Plan in place should be required to continually demonstrate five years of specific, deliverable sites for decision making purposes.

It is not considered that local planning authorities who have an up-to-date Local Plan should be required to continually demonstrate a five-year housing land supply. It is recognised that circumstances can change over the five-year period of an up-to-date plan, and allocations can turn out not to be deliverable. However, to address this, it is considered that the policies and housing supply of an adopted up-to-date Local Plan should include appropriate contingencies to enable appropriate alternative land to come forward rather than relying entirely on a speculative planning application approach. It is considered that requiring local planning authorities with an up-to-date local plan to continually demonstrate a five-year housing land supply risks undermining the plan-led system and reducing public trust in the Local Plan for their area. Without safeguards, it risks creating an incentive for developers to game the system by overstating delivery rates and timescales at examination stage, on the hope or expectation that within a short period after adoption delivery shortfalls would lead to application of the presumption in favour of sustainable development, weakening the local planning authority's ability to apply their recently adopted plan policies.

At Local Plan examination stage, the appropriateness and deliverability of local plan targets and sites should be rigorously tested to ensure deliverability of supply. This should take into account the best available information, including developer and other relevant views, of delivery timescales for the site build out and for the provision of any necessary infrastructure that may bear on the delivery timetable. The existence of a five-year housing land supply upon adoption should be categorically confirmed through the Inspector's report in order for a Local Plan to be found sound. Thereafter there should be a period of 'immunity' whereby the five-year housing land supply tested, confirmed, and found sound at examination is fixed so as to enable local planning authorities to implement their local plans and apply their recently adopted policies in full

at planning application stage. This is needed in order to strengthen the plan-led system and to increase the public's trust in local plans and the planning system. Particularly in those areas such as the New Forest where the challenges of delivering sustainable housing and economic growth has to be carefully planned to ensure that the cumulative impacts do not unacceptably harm the unique environmental attributes of the area.

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

No. Not enabling local planning authorities to factor in past over-delivery in their five-year housing land supply calculations in the same way that under-delivery is, rightly, required to be factored in (where the five-year housing land supply requirement is calculated using an up-to-date adopted Local Plan annualised housing target) risks penalising local planning authorities that have had a strong delivery record against a sound annual housing target (that is sufficient to meet the identified housing need figure) during the period covered by their up-to-date adopted Local Plan. It risks exposing such local planning authorities to the 'presumption' through no fault of their own and despite the fact that development has come forward ahead of schedule and therefore their housing growth targets set out in their local plan are being exceeded. As the consultation is proposing that all local authorities, including those who have up-to-date Local Plans in place, will be required once again to continually demonstrate a five-year supply of deliverable housing land, then the issue of how previous under/over-delivery against an up-to-date Local Plan annual housing target should be addressed in the five-year housing land supply calculation becomes relevant. New Forest District Council considers that both past under-delivery and past over-delivery should be taken account of.

**Question 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?**

No. Requiring all local planning authorities to add a 5% buffer to their five-year housing land supply calculations is not considered to be appropriate. It undermines the Plan-led system as it will place local planning authorities (who have an up-to-date Local Plan with a target that has met the tests of soundness) at greater risk of being under the 'presumption' by requiring additional deliverable land to be available on top of their adopted Local Plan annual housing target which has already passed the scrutiny of examination. The 5% buffer is an arbitrary figure and for local planning authorities with an up-to-date Local Plan in place should not be necessary as the quantum and deliverability of housing supply should have been rigorously tested at Local Plan examination stage to ensure it is sufficient to meet housing requirements with adequate flexibility and sufficient certainty of delivery.

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

No comments.

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

No comments.

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

Yes, in principle the proposed changes to paragraph 24 and 27 of the NPPF are considered to be positive. For the longer term, the consultation gives some information on how, in the longer term, the proposed reintroduction of strategic planning is proposed to work in areas with elected mayors. Very little detail is yet given in the consultation of how strategic planning will operate in areas without an elected mayor in place. There needs to be a clear statutory strategic governance system in place, preferably along the same lines as the previous regional planning/structure plans in order to ensure that all areas are included on a consistent and transparent basis.

Overall, there is a need to think of strategic planning on a wider scope rather than just neighbours and looking at housing need on a geographical/need basis. This is particularly the case in coastal areas, and those affected by significant environmental designations, where it is unlikely that neighbouring areas alone will be able to address wider housing needs.

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

No comments.

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

No comments.

**Question 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?**

In summary, New Forest District Council does not 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. This is because a standardised proportion of the existing housing stock is not an indicator of need, merely a reflection of what has already been built. It does not necessarily indicate where there are areas of significant over or under occupation of that housing stock. It

also fails to recognise that local authority boundaries do not necessarily align with equal opportunities to accommodate additional growth – indeed New Forest District’s administrative boundary for planning has been gradually reduced over the last fifty years due to local government reorganisation and the creation of the New Forest National Park. The use of household projections should be retained as these provide a forecast of how an area is anticipated to evolve demographically and therefore are an indicator of both the quantum and type of housing that will be needed in order to appropriately respond to/accommodate that demographic change.

The consultation proposes that 0.8% of the latest housing stock figure as published by the ONS should be used as the baseline for the standard method. The consultation states that on average housing stock nationally over the last 10-years has increased at an average rate of 0.89% annually. The consultation states that using 0.8% will therefore banks the average status quo level of delivery, to then be built on through affordability-focused uplifts.

Whilst it is recognised that using a proportion of the housing stock may be less volatile than using the latest household projections, it is considered that there are significant issues with the proposal to use housing stock as the baseline which are not addressed by the method.

The principal failing is that housing stock is neither an indicator of need nor demand, it is simply the total number of dwellings in an area and therefore merely a reflection of what has been built. For a method to calculate housing need, it must genuinely be an assessment of what the need/demand is likely to be in each area. In order to do this, the use of population/household growth projections is essential because it is these forecasts that will show how the number of households in an area is projected to change and how the demographics of an area are projected to change.

Furthermore, applying a flat rate of 0.8% across the board takes no account of the fact that some areas will have grown significantly more than this and also that some areas will have grown significantly less than this. For some areas therefore, the method will bank a baseline that is in fact far higher than what has been delivered on average over the last 10-years even before an adjustment for affordability is made. Using a percentage of the existing dwelling stock as a baseline will consequently have the effect of significantly impacting some areas where there is more housing stock, often that which has been built for well over 50 years and before current environmental designations that are now in place. Indeed, in the New Forest, the area available for the District Council to plan for has reduced significantly over the last fifty years due to local government reorganisation and the creation of the New Forest National Park. The method therefore will potentially have the effect of baking in a period of historic housing growth that due to physical or environmental constraints can no longer be delivered.

If the government decides to take forward its proposal to use a housing stock approach in order to calculate the baseline, then the proportion of housing stock that is within an area covered by a footnote 7 constraint should be discounted from the calculation of the baseline. This is because the NPPF is clear that these provide a strong reason for restricting the overall scale, type or distribution of development in the plan area. It is therefore not considered to be appropriate to use past housing stock growth in such areas as a benchmark upon which to base future housing need/growth calculations because, due to the presence of footnote 7 constraints, development is heavily restricted in those areas in the future and therefore future development (at the same levels that may have been achieved historically) would not be achievable or sustainable. Discounting the housing stock in these areas would provide mitigation against the risk of the standard method generating need figures that are simply undeliverable.

**Question 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?**

Looking at affordability averaged out over a three-year period is likely to be more reflective of an area's affordability than just using a single datapoint for the most recent year.

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

It is considered that affordability needs to be tackled through measures other than simply increasing the housing need figure, housing targets and the supply of housing land. To genuinely tackle affordability, more needs to be done to accelerate the rate and volume of housing delivery which will require clear measures to diversify delivery and adopted faster methods of construction. Increasing the supply of available housing land alone will not make any meaningful difference to housing affordability. Whilst the Council remains concerned about the increasing unaffordability of housing in relation to local income levels, it is not convinced that the multiplier based on affordability is logical or reasonable in relation to the New Forest. The New Forest attracts migrants from throughout the country due to the presence of the National Park and the coast and only if so many homes were built that it was no longer so attractive would it be likely that house prices would fall. It is the external demand from beyond the district, together with the designation of the National Park itself that has resulted in the disconnect between local incomes and house prices.

**Question 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?**

No comments.

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

The consultation suggests that there will be some places where it is not possible to meet the need figure generated, despite taking all possible steps, including optimising density, sharing need with neighbouring authorities, and reviewing Green Belt boundaries. The proposal appears to build room into the formula to account for the fact that there will not necessarily be a one-to-one relationship between 'notional housing need' and local plan targets. This appears to be the main explanation as to why the overall 'need figure' for England has increased from approximately 300,000 dwellings to approximately 370,000 dwellings.

Deliberately designing the formula so that it generates a higher overall figure to account for the fact that some areas will not meet need is not considered to be appropriate. The method for assessing housing need should be specifically designed to objectively do precisely that and nothing more. It should not attempt to artificially build headroom into the notional housing need figure. Furthermore, some of the areas that would see an increase in their need figure generated by the proposed standard method are in areas whereby it is clearly not going to be possible to sustainably meet the figure generated by the current standard method due to physical and environmental constraints. Consequently, the perceived headroom envisaged by the consultation will be very unlikely to materialise in practice because it has been placed in too many areas where it will not be possible to deliver the increase.

Instead, the NPPF could and should say more about how and where the Government's national housebuilding objectives should be met, rather than relying on a formula that is not sustainably deliverable in many areas where current growth pressures are highest. It would be helpful to include in the NPPF a high-level positive strategy (i.e. a national spatial plan) that better aligns the provision of homes and other development with where the sustainable opportunities genuinely exist.

Additionally, the proposed 'standard method' still does not, make any distinction for authority areas that have national parks within their boundaries and consequently the standard method is calculated on a whole authority basis with no differentiation between areas that are inside or outside the National Park. However, given that National Parks are, rightly, exempt from the standard method, the result is that the planning authority areas outside of the National Park are expected to provide for the housing need figure of the whole area generated by the standard despite only comprising a proportion of the of the area.

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

No detail or clarity is provided as to what a 'brownfield passport' would be or how it would work in practice. NFDC supports the principle of making the most optimal use of brownfield land in order to help to address



identified needs for housing and other forms of development (such as commercial, employment, community uses), and to facilitate economic/environment/social enhancements in urban areas. However, brownfield passports should not be introduced/used as a way of watering-down or circumventing planning requirements that are necessary to achieve sustainable development. Particularly in areas such as the New Forest where the challenges of balancing economic and housing growth with nationally and internationally designated environmentally sensitive sites is particularly acute.

**Question 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?**

The resulting changes would not alter the need for LPAs to judge each development on its own merit, but it would ideally require a Green Belt study to be undertaken to assess how the Green Belt is functioning in that location, as well as the relative “openness” of the Green Belt in that locality.

**Question 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?**

Glasshouses that are used for horticultural production should not be included within the definition of PDL as they do and can provide a beneficial economic use both now and, in the future, e.g., to facilitate food production (to increase the UK’s food security). It would not be considered appropriate to create a potential precedent whereby glasshouses in rural areas that are currently actively used for horticultural use could be simply redeveloped for an alternative use without strong safeguards as this could result in a shortfall of supply of suitable horticultural glasshouse premises and reduce the viability of glasshouses for horticultural production.

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

The proposed definition is quite broad/non-specific, and the challenge/issue will be regarding the practicalities of the application of the proposed definition. For example, to determine whether or not a parcel performs strongly against each Green Belt purpose and whether it makes only a limited contribution to any Green Belt purpose will require a comprehensive Green Belt review. The process/methodology in which Green Belt reviews are carried out in each authority area will need to be the same to ensure that comparable parcels (regardless of location in the country) are treated consistently so that there is fairness in how the definition of ‘Grey Belt’ is applied.

Furthermore, it is uncertain whether each local authority should undertake a Green Belt review individually or whether there should be more encouragement for groups of authorities work together as a group to

jointly commission a strategic Green Belt review (e.g., all authorities that are within the South-West Hampshire / Dorset Green Belt commissioning a single joint study the Green Belt in this region rather than individual Green Belt reviews commissioned individually by each authority)?

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

An approach similar to that used for Biodiversity Net Gain could be used that introduces a base date for qualifying green belt / landscape features, and which could be used to detect deliberate degradation by a landowner. There is a risk however, that this could be complex / expensive to set up.

**Question 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?**

Additional guidance will be essential in order to ensure that Green Belt parcels are assessed consistently and that the definition of what makes a limited contribution is applied consistently in authorities across the country. This should be contained in the Planning Practice Guidance. However, it should be noted that there are already a number of comprehensive Green Belt reviews prepared by LPAs which can be drawn upon for their approach, etc. For example, the study prepared to inform the preparation of the New Forest Local Plan 2016 – 2036 Part One: Planning Strategy (July 2020).

**Question 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?**

It would be helpful to set out what defines 'limited contribution' – one example would be whether performing poorly on just one green belt purpose is sufficient to decide that a parcel of Green Belt land is making a limited contribution. Or whether a combination of the five purposes is required for it to be making a limited contribution. Otherwise, there will be varying interpretations between different local authorities; this will lead to drawn out discussions at the examination stage and could even delay the processing of adopting new Local Plans.

**Question 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?**

The outputs from LNRS work have enormous potential to show where areas of the plan area can be enhanced for nature. It is self-evident that LNRS conclusions should be used as part of the evidence base in Local Plan production.

Whilst LNRS will be important to identify areas of Green Belt that can be / would be beneficial to enhance, this should be at a high level and not detailed. It could also be coupled with a call for sites for natural capital / green infrastructure as part of preparing local plans to assist delivery as well as identification.

**Question 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, there is merit in this approach. It allows local planning authorities to appraise their own sites and set out the evidence for the more sustainable locations. The principle of using a sequential approach to identifying sites is one used in other areas of planning such as flood risk. It is therefore a familiar process to follow.

**Question 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?**

Yes. Where the NPPF directs LPAs to carry out a comprehensive review of Green Belt in its plan area it would provide the opportunity to appraise the function of the Green Belt in full (taking account of any proposed Green Belt release).

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

The NPPFs overall emphasis on sustainable locations first is welcomed, with priority then given to previously developed land (PDL), followed by "grey belt" and green belt last of all. This approach is one we would agree with. Clarity on the government's intentions as to what sustainable forms of development in the Green Belt would be supported would however be helpful – there are reservations about the appropriateness of single dwellings being justified by this policy as opposed to more quantifiable contributions to wider development needs e.g. a scale of housing which helps to more substantially address housing need and has ability to deliver more sustainable developments.

The proposed changes (the proposed new paragraph 152 of the NPPF) bring with them the potential risk of undermining the Local Plan process and trust in the planning system, by creating a potential incentive for developers to push forward speculative planning applications on Green Belt sites rather than having such sites considered strategically through the Local Plan preparation process. The proposed approach risks leading to poorly planned ad-hoc Green Belt release rather than Green Belt being formally released through the Local Plan process where there is greater opportunity for engagement with communities and other relevant stakeholders to ensure that any Green Belt release occurs in sustainable

locations (supported by the appropriate infrastructure) as justified by a Local Plan evidence base and Sustainability Appraisal, and is strategically planned rather than ad-hoc/piecemeal.

There is also the potential issue of developers seeking to pre-empt the formal Green Belt review process undertaken as part of a Local Plan review by undertaking their own Green Belt assessment and then arguing that their site should be considered as Grey Belt through a planning application or by appeal inquiry on the basis of a Green Belt assessment they decide to commission and submit as part of their planning application, particularly if their assessment is more recent than a Green Belt review undertaken by a local authority. This runs the risk of creating a very resource intensive and time-consuming process/system for all parties.

There are also some reservations about whether Green Belt land may be deliberately degraded to lower its value and contribution to be considered as Grey Belt? Similar to BNG should there be protections in place to prevent / deter this.

In this regard, it would be worth the Government considering how the NPPF or other guidance could provide directions for strategic Green Belt reviews, where relevant, at larger than Local Plan scale. This would necessitate a more strategic approach to planning than has hereto been the case. Such a strategic review could set the 'general extent' of Green Belt in each area/region and identify where more detailed changes to boundaries are needed through the local plan process.

**Question 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?**

It is probable that 'grey belt' sites (as defined in the current NPPF consultation) contain land that is in use for commercial / other needs as much as for residential use. It would therefore make sense to release Green Belt (grey belt) where it is adjacent to existing commercial units and the Green Belt review concludes that release would not fundamentally undermine the function of the Green Belt across the area of the plan.

**Question 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?**

We do not see why it shouldn't also apply to traveller sites. These are akin to residential uses and once allocated as traveller sites they generally remain in that use.

**Question 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?**

Timing wise, such an assessment should take place at the same time as any Green Belt review as part of the Local Plan process, and directly alongside other technical studies that are undertaken as part of a Local Plan review (thus informing each other as appropriate).

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

Yes, whilst the Council recognises the increased emphasis on social rent, it agrees that the appropriate affordable housing tenure mix should be determined locally to ensure that the affordable housing provided meets the needs of the local population as far as possible and that viability is considered according to local circumstances.

**Question 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?**

The Council considers that the 50% affordable housing target should apply to all Green Belt areas.

**Question 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, the council supports the proposed requirement for improved public access to and quality of green spaces. It appears as though this requirement will apply to all development on land released from the Green Belt and it would be helpful if the government could provide guidance on how it envisages this requirement would be met in terms of scale and location for non-residential development. This should be strategic and joined up with existing provision however and look outside any relevant red line and also consider benefits to heritage assets and their setting.

**Question 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?**

Yes, the council supports the new approach to indicative benchmark land values for land released from or developed in the Green Belt. This should help to ensure that a larger proportion of affordable housing is delivered without the potential for reduced contributions justified by viability considerations.

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

The consultation questions state, in relation to benchmark land values, that the allowance for the amount of money paid to a landowner should be set by the local planning authority. Whilst the council acknowledges that it is responsible for carrying out the viability assessment of its local plan policies and taking account of viability in decision making on planning applications this is very much within the restrictions of existing government guidance and market conditions, rather than the local planning authority determining appropriate land values. The council would not wish to offer a view on the exact level of benchmark land values, although it suggests that the advice of the Royal Institute of Chartered Surveyors would be relevant and that the provision of affordable housing, infrastructure and green space should be prioritised over excessive landowner profits, particularly when agricultural land is released.

**Question 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?**

The council would support this approach which should ensure that the scarcity of land for development will not push land prices so high that policy requirements (particularly affordable housing) are not delivered.

**Question 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?**

The Council agrees that as it would be unlikely to be able to require higher levels affordable housing when development is policy compliant it is helpful that this is made clear in the revised NPPF.

**Question 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?**

Yes, the council considers that this approach is appropriate for larger sites and should be applied to all development, not just Green Belt release or development.

**Question 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?**

The council notes that in relation to non-residential development the golden rules are restricted to necessary improvements to local or national infrastructure and the provision of new, or improvements to existing, green spaces that are accessible to the public. The council considers that government will need to publish guidance on whether, in terms of infrastructure, this will be solely provision to meet the needs of development and in terms of green space, whether it envisages that there will be an empirical requirement based on the size of the development. Similar considerations apply to infrastructure provision in relation to residential development, although the matter of amount of green space provision is addressed in the proposed NPPF revisions.

**Question 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?**

The council considers that it would only be appropriate to apply the golden rules to 'new' Green Belt release given the relatively limited transition period for local plans currently at an advanced stage. However, they should apply to all development management decisions for land in the Green Belt from the date of publication of the revised NPPF.

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

It would have been helpful if the government could have proposed a benchmark land value rather than leaving this blank and asking for views. This is such a critical part of the change of approach that it may require further thought and detailed discussions with relevant stakeholders once the government has come to a view and prior to finalising in the revised NPPF.

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

The council welcomes the significant change in approach to securing Green Belt land for development without meeting over inflated land values. It would suggest that a national approach through Homes England could be the most efficient way of achieving this approach, given the need for specialist resources to implement complex CPO legislation.

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

The government may wish to consider whether the proposed approach for benchmark land values and CPO could also apply to greenfield development outside of the Green Belt.

**Question 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?**

Yes, this is already implicit in the NPPF and planning practice guidance, however, it is helpful that there is a clear reference. Given viability considerations the government will likely need to consider how this is funded and whether there will be specific government funding provided to enable social rented housing.

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

Yes, the council supports this change to reprioritise provision for those in most need of assistance.

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

Yes, the council supports this change to reprioritise provision for those in most need of assistance.

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

Given that First Homes have rarely been implemented, have complex future sale arrangements and are generally only accessible to those that can already afford existing housing in the market, the council does not have any objection to removing the First Homes option and considers that at the very least the national policy in relation to provision on exception sites should be rescinded.

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

Yes, the proposed change reflects current practice.

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

Government funding will likely be required to deliver high percentage Social Rent/affordable housing requirements. The government could also consider widening its proposed approach to benchmark land values and CPO to greenfield development generally (particularly larger schemes) rather than just development on Green Belt land. The overall quality of development (including provision of infrastructure) will be key to ensuring support for schemes with a high percentage of Social Rent/affordable housing which is why either government finding or a different approach to land value capture is necessary.



**Question 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?**

This is a difficult question to answer, and research would be helpful to inform the answer, but the council would suggest that a maximum site size in the range of 50 – 100 dwellings would be appropriate for schemes with a very high proportion of Social Rent/affordable housing.

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

The existing exceptions policy is a good approach to support the provision of rural affordable housing. However, to ensure that provision is prioritised for those in most need it is suggested that it is restricted to Social Rent housing. Government funding and support for community interest companies would help increase provision of rural affordable housing.

Where rural exception site policy is not appropriate or applicable, additional rural affordable housing could be facilitated through the lowering of the affordable housing threshold and the application of vacant building credit in rural areas, e.g. the conversion of former agricultural buildings in new residential accommodation could then deliver a percentage of affordable housing.

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

Yes, the council welcomes the clarification on assessing the needs of 'looked after children' as a specific group, although notes that meeting those needs will likely require government funding.

**Question 56: Do you agree with these changes?**

Yes, the council agrees with the changes to widen the definition of groups that can deliver community-led housing and allow local plans to set the size limit for community-led exception sites.

**Question 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?**

The council considers that it is appropriate that affordable housing to rent (Social and Affordable Rent) is provided and managed by Registered Providers, registered with the Regulator of Social Housing. The provision of this affordable housing by Registered Providers helps to ensure and provide confidence in the quality of these homes and their ongoing management and maintenance. Although the consultation indicates the question is raised to consider how to enable organisations such as CLT's

and Almshouses to develop new affordable homes, broadening the definition could run the risk of opening up opportunities for (unregulated) private developers to opt to deliver affordable housing to rent delivered through s106's. Further to this, the council considers that this change is not required as they could fall under the definition of 'build to rent' which is not restricted to registered providers.

**Question 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?**

Potential reasons on why insufficient small sites are being allocated include:

- In less dense, more rural/suburban areas such sites will provide relatively small numbers of homes compared to the overall housing targets. Consequently, authorities may choose to focus more resource in providing an appropriate policy framework (given by a formal allocation) to larger sites that will make a more significant contribution towards their housing targets, and enable smaller sites to come forward as windfall sites.
- viability challenges with bringing such sites forward, insufficient value in developing such sites compared with the costs of doing so and therefore reducing the incentives for landowners/developers to bring such sites forward.
- Availability/ownership/land assembly issues for small sites that have multiple landowners.

It is not clear how the current NPPF requirement at paragraph 69(a) (that requires local authorities to identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare) assists effective and timely plan-making. It may result in additional work being created by either lengthening the time-taken and work needed for the site identification process in order to meet the 10% figure or through authorities having to produce extra evidence to demonstrate why they cannot meet the 10% figure.

**Question 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?**

Yes, the Council considers that the proposed changes will avoid the difficulty of definition and potential ambiguity in decision-making.

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

Yes, the Council welcomes the proposed changes and reduced emphasis on mansard roofs.

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

No

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

No, the proposed changes are too permissive in their nature and fail to recognise that constraints may make some of the development referenced inappropriate in some locations. Whilst it is acknowledged that economic development needs, including modern formats, need to be met, the sub-regional, regional and national catchments for (and footloose nature of) some of the uses mean that cross-boundary strategic planning is essential to accommodate them in the right places. The current proposed wording implies that if there is a need it should be met through local plan allocations or planning permissions without considering where the best place to meet these needs might be. Furthermore, the proposed changes mean that the overly permissive policy approach would not just apply to the specific sectors that the government wishes to support, but the proposed addition of criterion c) to existing paragraph 87 means it would cover all industries.

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

No, the proposed addition of criterion c) to existing paragraph 87 appears to cover all industries.

**Question 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?**

No, the council considers that the need for these types of buildings should be most appropriately addressed through cross-boundary strategic planning and appropriate allocations made in local plans or through decisions on planning applications.

**Question 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?**

Without specifying a size of building or site, the council considers that the government should define criteria which mean that only projects which are clearly and demonstrably nationally significant are included and the direction power is not used to avoid local decision making.

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

Yes, the scale of the catchments and footloose nature of many modern businesses mean that some form of strategic planning is needed to support and facilitate growth in appropriate locations. This should be referenced and recognised in this chapter.

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

Yes, the council welcomes the clarification that significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure.

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

Yes, the council welcomes the additional recognition given to early years and post 16 facilities.

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

Yes, the Council considers the changes proposed in relation to a vision led approach to transport planning to be appropriate and welcome.

However, it will need to be ensured that this aligns with other measures being or proposed to be taken by the government in relation to infrastructure projects, including funding. It is considered imperative that the new infrastructure (e.g., upgrades to the strategic road network) required to support increased levels of development (e.g., major housing and/or employment schemes) or that would enable the delivery of more sustainable transport modes (e.g., bringing former railway lines back into fully functioning use for passenger services) is fully supported by the policies and measures pursued by the government.

The changes are likely to require further guidance on what is meant by the proposed addition of the words 'in all tested scenarios' at the end of paragraph 115 of the existing NPPF. As it currently reads it implies that it would only need one of the tested scenarios to show that the development would not have an unacceptable impact or a severe (cumulative) impact on the road network for it to be considered acceptable.

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

There have been a number of studies over the years on the interface between planning and health. Most of the key components in promoting /

facilitating healthy communities are already known (prioritising walkability and active travel, improving quality of housing, reducing exposure to environmental hazards, and linking with local health strategies on food. Bringing the best of this research and best practice into the NPPF and associated planning guidance would provide the necessary steer on these issues and provide consistency in implementation.

The council considers that implementation of existing approaches to green infrastructure and open space provision should continue to be supported. Policies to seek to control hot food takeaways near schools should be subject to local determination and facilitated, rather than prescribed through national policy. Increased government funding for safe cycling and walking routes to join up new facilities provided in new development (in particular routes to schools) can help tackle childhood obesity.

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

No

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

Yes, given the important contribution required from onshore wind for the government's carbon net zero targets to be achieved, it is considered that large onshore wind projects should be reintegrated into the NSIP regime.

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

If the planning system is to make any progress on the challenge of climate change and low carbon energy it will need to be bold in its approach. The changes proposed are eminently sensible and would help us make advancements regarding the delivery of low carbon electricity. The changes proposed retain safeguards for wider environmental protection and in this regard the proposals are also sound.

Yes, the proposed changes to the NPPF to reduce the barriers for onshore wind and give weight to the benefits of renewable and low carbon development are appropriate to help achieve government carbon net zero targets.

**Question 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?**

Yes, additional protections should be put in place to ensure that carbon impacts are assessed holistically, including the benefits of carbon

sequestration. These can be considered irreplaceable habitats and should not be impacted by renewable energy or other development except in truly exceptional circumstances.

**Question 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?**

Yes, it is considered appropriate to return some of the smaller scale onshore wind proposals for local decision-making.

**Question 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?**

Yes, it is considered appropriate to return some of the smaller scale solar proposals for local decision-making.

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

No comments.

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

The previous Code for Sustainable Homes was on track to achieve developments that were low carbon and sustainable in a number of other aspects by 2016. Progress was being made and the development industry was responding well to the policy environment. That policy was scrapped by the previous government. Therefore, a return to more challenging targets for the house building industry would level the playing field for all developers. Applying low space heating requirements in all new development should be a cornerstone of the governments approach. Like the previous code, the requirements and timetable for this should be ambitious and unambiguous. They should also be located in the building regulations policy arena – in this regards the planning system and building regulations regime could mirror one another in their approach.

The written ministerial statement preventing local planning authorities setting energy efficiency standards for new buildings in local plans that are not related to a percentage uplift of the target emissions rate calculated using a specified version of the Standard Assessment Procedure (SAP) is outdated and should be rescinded. Instead, local plan policies should be allowed to introduce standards to reduce energy demand and facilitate renewable energy generation with the aim to reach carbon net zero. The council considers this essential if the government's carbon net zero targets are to be achieved.

**Question 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?**

The council considers that the development industry is already able to provide sufficient information on energy demand and renewable energy generation to allow an assessment on the carbon performance of the building in terms of its operation. However, embodied carbon is significantly more difficult to assess and will need national policy approaches rather than being addressed by individual local planning authorities.

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

Policy content and sequential approach (and associated risk classification) works reasonably well in operation. However, the cooperation and presence of the EA in the Local Plan process could be improved - some of that is resource dependent so some thought from the government on how that could be better resourced would assist local planning authorities understand the risks associated with different spatial options.

The sequential approach should not necessarily be applied to surface water flooding (which can be managed through drainage improvements) in the same way as tidal, fluvial or groundwater flooding.

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

No comments.

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

Yes, the footnote served no useful purpose unless there was further government policy on the how the need to protect agricultural land should be assessed.

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

It is difficult to envisage that there is way for development to support and not compromise food production when agricultural land is developed, and former countryside becomes part of the urban area. There may be opportunities to encourage retained agricultural use of land within solar or onshore wind schemes. Due to requirements around nutrient neutrality, development can compromise food production through nutrient mitigation schemes taking land out of food production or reducing the intensity of the agricultural use with reduced food production. Investment in wastewater treatment plants could negate the need for nutrient mitigation

schemes related to new development. The suggested redesignation of horticultural glasshouses as PDL in this context appears to be counter intuitive.

**Question 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?**

No comments.

**Question 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?**

No comments.

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

No comments.

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

Yes, the council considers that the criteria are clear and helpful and are preferable to just relying on the existing legislation and the Secretary of State's judgement. The government should consider whether these could be made more objective rather than relying on judgement against broad headings.

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

No, the council's preference is that there are policy criteria even if as proposed these are extremely broad.

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

Yes.

**Question 90: If no, 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.**

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



No comments.

**Question 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?**

- Yes
- No – it should be higher than £528
- No – it should be lower than £528
- no - there should be no fee increase
- Don't know

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

NFDC does not currently have the detailed working on costings available to determine to the contrary of the consultation.

**Question 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.**

The fee for "Other Changes of Use" is only £578, whereas the Change of Use for more than 50 dwellings has a maximum fee of £405,000. The consideration of impacts and the assessment of a Change of Use of a building or land to a use which is not residential can take up a lot of officer time and should correlate with the change of use schedule for a residential scheme.

The consultation text makes reference to the fees for Prior Approvals. These fees will never cover the cost of officer time and work. Taking the Householder Prior Approval as an example, if representations are received then a full assessment of neighbouring impacts is required for a fee of £120. If the householder fee is potentially being increased to £528, then prior approval fees should be adjusted accordingly.

The fee for the approval of details submitted pursuant to conditions is small relative to the work involved. £43 for householders and £145 for all others goes nowhere near covering the officer time in considering and assessing these details.

**Question 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.**

Listed Building Consent applications currently do not have a fee – in the past the council hoped to encourage applicants to engage with it when carrying out work eg repairs. However, it is now well accepted that unauthorised works to a listed building is a criminal offence and the

necessary consents are required when selling the property. The council's LPA fee would be minimal compared to fees charged by private architects/surveyors and the advice will be more useful to the building owner.

**Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee? Please give your reasons in the text box below.**

Yes. Regional variations will occur that will influence the resourcing for the handling of applications. It would be useful to be able to set fees locally.

**Question 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.**

**Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.**

**Neither**

**Don't Know**

**Please give your reasons below.**

Local Variation. As per the answer to Q94, there will undoubtedly be regional variations in costs and to that end a scheme of local variation would be a more flexible, but still structured way of managing fees.

Solely leaving it to an authority could result in fees being too high and disincentivising development in favour of more affordable neighbouring or further away areas.

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

**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?**

No. Applicants will want to see tangible outcomes from their development, and it may not materialise through that other work.

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

Enforcement and breaches of planning control.

**Question 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?**

Yes, albeit this is already the position for some local authorities in seeking to engage with the process and ensuring that costs are covered. Clarify from government that this is appropriate for all local authorities, on the basis of full cost recovery, would be welcomed.

**Question 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.**

Costs should cover all the necessary disciplines that comprise the relevant material planning considerations and at all stages of the process.

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

There should be no limitations. If the test is cost recovery, why limit this?

**Question 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.**

Providing clearly for full cost recovery of local planning authorities throughout the totality of the DCO process would enable local authorities to engage from the outset in offering a local perspective and knowledge with consequential benefits for the examining authority and the quality of the overall scheme. This extends to any subsequent DCO being granted, with the implementation (including discharge of requirements and monitoring) being able to be effectively resourced by the local planning authority. This council has limited experience to date in DCOs, but experience from colleagues elsewhere in Hampshire suggests that the actual costs of local authority engagement in larger DCOs can extend many hundreds of thousands of pounds (and often over £1 million) over the DCO process.

Partial cost recovery means that the case advanced by an authority may not be the fullest, or to achieve a full case could result in funding being taken from other relevant Council services.

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

No comments.

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

The transitional arrangements are unlikely to be applicable to New Forest District Council given its current plan-making stage.

**Question 104: Do you agree with the proposed transitional arrangements?**

Yes, the council welcomes the extension to the December 2026 for the submission of plans under the existing 2004 Act.

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

The council suggests that the government should set out as soon as possible further information regarding its intention to implement the new plan-making system as set out in the Levelling Up and Regeneration Act as this change is likely to cause delay and uncertainty to the preparation of local plans and is unnecessary.

**Question 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?**

No comments.