

## **ANNEX B: COTSWOLD DISTRICT COUNCIL RESPONSE TO [CHANGES TO THE CURRENT PLANNING SYSTEM CONSULTATION](#)**

### **The Standard Method for Assessing Housing Numbers in Strategic Plans**

**Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is *whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?***

Paragraph 13 of this consultation document identifies that household projections cannot in isolation forecast housing need, as they project past trends forward. This is namely because low historic housing delivery rates would otherwise result in an artificially low future housing need figure. For the same reason, a high historic delivery rate results in an artificially high future housing need.

For technical reasons, the way in which population is measured in the 2018 household projections means that the entire twenty-five year projection is based on two years of migration trends. A location that has experienced an extremely high migration rate in the preceding two years would therefore have a skewed and artificially high baseline position on which to base the future housing need.

The use of 0.5% of the housing stock as a baseline position has a similar issue. The dwelling stock count is taken from a single point in time, which is the most recent dwelling stock figure. However, this figure does not take consideration of the amount of housing delivered in the years up to the point when the dwelling stock count is taken. So a local authority that has delivered an extremely large number of houses in recent years will again experience an artificially high housing need.

To overcome the issue of a skewed and artificially high baseline position, Cotswold District Council recommends that a further adjustment factor is included when setting the baseline, which takes consideration of housing delivery over the previous 10 years or possibly longer over an economic cycle. This will iron out any anomalous peaks in delivery in the preceding years.

**Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.**

As with Q1, Cotswold District Council recommends that a further factor needs to be taken into account.

The dwelling stock count is taken from a single point in time, which is the most recent dwelling stock figure. However, this figure does not take consideration of the amount of housing delivered in the years up to the point when the dwelling stock count is taken. So a local authority that has delivered a high number of houses in recent years will experience an artificially high housing need.

To overcome the issue of a skewed and artificially high baseline position, Cotswold District Council recommends that a further adjustment factor is included when setting

the baseline, which takes consideration of housing delivery over the previous 10 years or possibly longer over an economic cycle. This will help take consideration of both historic under-delivery and over-delivery.

**Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.**

No

Weak correlation between affordability of housing and need for more housing

The housing affordability ratio has a reasonably weak correlation with the actual need for additional housing. There is little evidence to suggest that building more houses decreases house prices significantly to enable housing to become affordable for those who need it. Only using the affordability indicator as an adjustment factor is a significant over-simplification of the affordability issue.

The situation in Cotswold District illustrates this issue well. The District has maintained between a 6-7 year supply of housing sites for over five years now, and over 5 years since 2013. The district has also been within the top 10 authorities in the country for its Housing Delivery Test score since this test was introduced. Indeed, the District has sustained a significant over-delivery of its housing requirement since 2011. Yet house prices in Cotswold District have continued to increase and affordability has continued to worsen.

The Council has made significant areas of land available for housing and has been a leader in the national effort to boost the supply of housing, yet the desirability of owning a home in the Cotswolds is such that simply building more housing has not solved the affordability issue here.

There are multiple nuanced factors that need to be addressed to improve the affordability of housing. For example:

- land banking (i.e. land being used as a financial asset to increase share prices rather than to deliver housing) and developers purposefully 'drip-feeding' new homes into the market to inflate house prices;
- wages have not kept pace with house prices;
- not enough social housing has been built;
- government initiatives have indirectly kept house prices artificially higher;
- low interest rates and the increased ability of people being able to get a mortgage have both fueled an increase in house prices; and
- second home ownership and buy to let have removed housing from the market that could otherwise be made available to first home owners, and the resulting increased demand within a reduced pool of housing stock inflates house prices and worsens affordability.

This list is not exhaustive.

Using the workplace-based median house price to median earnings ratio is unlikely

to produce a figure for the number of homes that is actually needed in reality, nor will it address the housing affordability issue.

### Unrealistic and Undeliverable Housing Need Figure

The unrealisticness of the housing need figure that is produced using the proposed Standard Method is also a significant issue. The situation in Cotswold District again illustrates this well.

The proposed Standard Method for calculating housing need would provide an unconstrained national housing need of 337,000 homes. Paragraph 40 of this document explains that this is the starting point for planning and not the final housing requirement. It also explains that not all homes that are planned for are built and that the new standard method total is designed to provide enough land to account for the drop-off rate between permissions and completions.

The Council notes that the Planning for the Future White Paper proposes that the extent of land constraints in an area would be taken into consideration when setting housing requirements.

Cotswold District is 80% Area of Outstanding Natural Beauty and has various other significant constraints in the remaining 20% of the District. It is unclear how much reduced the housing requirement would be compared to the District's housing need calculated by the Standard Method. However, Cotswold District's housing need is currently an average of 420 homes a year over a 20-year period. This compares to the proposed Standard Method housing need of 1,209 homes a year (or 12,090 homes over a 10-year period). To put this in context, this would require a 50% increase of the District's entire housing stock within 20 years.

Given that Cotswold District is amongst the most constrained locations in the county, the proposed Standard Method calculation of housing need seems to be vastly unrealistic.

Cotswold District has delivered an average of 413 homes a year over the last 20 years and 543 homes a year over the previous 10 years. The District had one exceptional year where 910 homes were delivered, although this has nowhere near been matched in other years or sustained over a period of time.

Cotswold District Council foresees that even a significant reduction to the 1,209 homes a year that is currently proposed by the Standard Method would still be undeliverable.

It is highly unlikely that Cotswold District is the only authority that faces this situation. Indeed, Lichfields, who the White Paper acknowledges have been helpful in shaping the Standard Method, identify that "*the new method still continues to concentrate growth in London. Its figure of 93,532 looks unrealistic, given long term delivery rates in the capital of 30-40,000 per annum. Without a duty to cooperate, the excess need (50-60,000 homes) will fall between the cracks, meaning 300,000 may still be beyond reach.*"<sup>1</sup>

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<sup>1</sup> [Lichfields, How Many Homes? The New Standard Method](#)

**Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.**

No.

The measure of affordability that is referred to relates specifically to changes to the affordability ratio over the last 10 years. The affordability ratio is based on two datasets: workplace-based median house prices; and median earnings.

This is a significant over-simplification of the affordability issue and ignores other important factors that must be taken into account when calculating housing needs. Furthermore, the housing affordability ratio has a reasonably weak correlation with the actual need for additional housing. There is little evidence to suggest that building more houses decreases house prices significantly or makes housing more truly affordable.

The situation in Cotswold District illustrates this issue well. The District has maintained between a 6-7 year supply of housing sites for over five years now, and over 5 years since 2013. The district has also been within the top 10 authorities in the country for its Housing Delivery Test score since this test was introduced. Indeed, the District has sustained a significant over-delivery of its housing requirement for many years running. Yet house prices in Cotswold District have continued to increase and affordability has continued to worsen.

The Council has made significant areas of land available for housing and has been a leader in the national effort to boost the supply of housing, yet the desirability of owning a home in the Cotswolds is such that simply building more housing has not solved the affordability issue here.

There are multiple more nuanced factors that need to be addressed to improve the affordability of housing. For example:

- land banking (i.e. land being used as a financial asset to increase share prices rather than to deliver housing) and developers purposefully 'drip-feeding' new homes into the market to inflate house prices;
- not enough social housing has been built;
- wages have not kept pace with house prices;
- not enough social housing has been built;
- government initiatives have indirectly kept house prices artificially higher;
- low interest rates and the increased ability of people being able to get a mortgage have both fueled an increase in house prices; and
- second home ownership and buy to let have removed housing from the market that could otherwise be made available to first home owners, and the resulting increased demand within a reduced pool of housing stock inflates house prices and worsens affordability.

This list is not exhaustive.

**Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.**

No.

The standard method gives significantly more weight to affordability than it ought to. The need for additional housing must take in other factors than just housing affordability.

**Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:**

**Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?**

Cotswold District Council neither objects or supports this proposal.

Clarity is needed on the status of housing requirements in adopted Local Plans in the interim period until new Local Plans are adopted, particularly if the housing need / housing requirement, as identified by the proposed standard method, is significantly different to that identified in the adopted Local Plan.

**Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate?**

**If not, please explain why. Are there particular circumstances which need to be catered for?**

Cotswold District Council neither objects or supports this proposal.

Clarity is needed on the status of housing requirements in adopted Local Plans in the interim period until new Local Plans are adopted, particularly if the housing need / housing requirement, as identified by the proposed standard method, is significantly different to that identified in the adopted Local Plan.

**Delivering First Homes**

**Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):**

- i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.**
  
- ii) Negotiation between a local authority and developer.**
  
- iii) Other (please specify)**

ii. Negotiation between a local authority and developer

The NPPF currently requires local planning authorities' to prepare a Local Housing Needs Assessment to assess their full housing needs, identifying the mix of housing and the range of tenures that the local population is likely to need over the plan period.

Having identified the relevant need (including First Homes) the NPPF requires local planning authorities to use their evidence base to develop policies in their Local Plan that caters for the identified housing demand and the scale of housing supply necessary to meet this demand. With the top-down regulatory imposition of a nationally set percentage and the effects that it could have on the subsequent remaining affordable housing provision, it is better for the local authority to secure the most appropriate option through negotiations for the remaining 75%, to address their housing need.

The Council is also concerned that the proposed minimum percentage of First Homes would mean that local authorities may not be able to deliver any other forms of affordable homeownership housing, in particular shared ownership and social rented housing. Local Housing Needs Assessments undertaken to date in Cotswold District have identified an overwhelming need for rented affordable housing compared to affordable homeownership products, and policies are drafted to meet this demand. Analysis of planning permissions for the past three years indicate that the remaining number of shared ownership properties that could be delivered would

be low. The Council questions whether it will be practical for Registered Providers to continue seeking to deliver shared ownership housing for such a low number of units.

The consultation only refers to a policy compliant provision and does not comment upon the effects that First Homes may have upon the deliverability of new developments (particularly where viability is an issue) and the deliverability of the First Homes.

It recognises that many Registered Providers currently pay 65% upwards of Open Market Value for the provision of shared ownership accommodation, whilst First homes will be 70%, although this will be more risk based with income sales occurring further down the line. Currently many viability appraisals assess affordable housing provision based on a 6% profit return; however for First Homes it is envisaged that developers will argue the profit return should be 20% as for market housing, causing the First Homes to become less financially viable for provision than shared ownership and in some cases close to affordable rent values. These will mean that local authorities may see their overall affordable housing provision reduced to accommodate the delivery of First Homes, particularly if a percentage requirement is set.

First Homes will not offer the benefits that other affordable tenures can, such as providing an upfront capital income at the beginning of development and controlling absorption rates, all of which can assist in de-risking developments. Therefore, focusing on delivering a viable range of tenures is the most effective way of increasing housing supply. Where policy compliant provision is not possible and viability indicates that alternative forms of affordable housing improves the level of affordable provision, then local authorities should be able to negotiate the type of affordable housing to be delivered to maximise overall delivery rather than having to provide the set 25% requirement.

Whilst the provision of First Homes is supported, in that it represents an additional affordable housing option available to some people, this should not be at the expense of all other types of affordable housing, particularly if the level of local demand for starter homes does not exist or exceeds local affordability. Should the above scenario occur, where more First Homes are provided than needed, the consultation does not highlight or consider how developers and local authorities will deal with these empty properties, and the potential impact this may have on stalling other developments in coming forward.

Local authorities should be able to set the minimum percentage requirement based on their housing need identified through the Local Housing Needs Assessment, balanced against the need for the provision of other forms of affordable housing.

**With regards to current exemptions from delivery of affordable home ownership products:**

**Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?**

Yes

The Council agrees that existing exemptions should also apply to the First Homes requirement.

**Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.**

The Council considers that all existing exemptions are required.

**Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.**

The Council does not consider any additional exemptions are required.

**Q12: Do you agree with the proposed approach to transitional arrangements set out above?**

The Council agrees with the proposed approach to transitional arrangements

**Q13: Do you agree with the proposed approach to different levels of discount?**

Paragraph 59 highlights that the minimum discount for First Homes should be 30% from market price which will be set by an independent registered valuer. The Council would welcome guidance as to how this will be monitored and enforced.

The Council welcomes the proposal for local discretion to increase the discount to 40% or 50%, evidenced through the local plan making process, in high value areas if First Homes are to be genuinely accessible to median income earners. However, where this adversely affects viability and reduces the overall level of affordable housing that can be sought, local authorities should be able to set a lower than 25% requirement for First Homes to maintain delivery of affordable housing at current levels.

**Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?**

No

In rural areas, we need to balance housing need with overall sustainability and the proposal is for exception sites. Homes sold at up to 70% of open market value should be sufficient to deliver a viable scheme. There is a concern that the possibility of allowing market housing will just encourage landowners to seek the provision of market homes to inflate land values. The Council's preference would be to, where necessary, allow other forms of affordable housing on entry-level exception sites particularly affordable rented housing. This could allow grants to be accessed which can assist in de-risking development.

**Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?**

No

The proposal that First Homes exception sites should be proportionate in size to the existing settlement is too general a control and would be open to much interpretation. The above scenario could lead to large sites coming forward, where more starter homes are provided than there is local demand for, given the very high house price to local incomes ratio. Neither this consultation nor previous consultations have highlighted or considered how developers and local authorities in such scenarios will deal with potentially unsold properties, and the impact this may have in stalling other developments coming forward.

**Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas?**

Yes

It is essential to retain the existing rural exception sites policy in designated rural areas, and not First Homes. This will allow the Council to continue to provide the right type and tenure of affordable housing for the needs of those rural settlements. Genuinely affordable housing, particularly social rented, is very much needed to retain low paid local workers in sectors such as agriculture, tourism and healthcare that are vital to rural areas.

**Supporting small and medium-sized developers**

**Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?**

(see question 18 for comments on level of threshold)

No

The proposed changes would reduce the amount of affordable housing that could be sought via housing policies in Local Plans, and would have a detrimental impact on the supply of affordable housing for a much longer period than 18 months. Owners of sites with planning permission that have an affordable housing contribution could potentially reapply for planning permission to attain the affordable housing exemption. Furthermore, sites that would otherwise have been expected to provide affordable housing in, for example, the next 5 to 10 years would be incentivised to be brought forward sooner in order to capitalise on the reduced financial burden of not having to provide affordable housing, thus impacting on the delivery of affordable housing long after the proposed 18-month period.

Local Authorities have an important role in the delivery of affordable housing that pro-actively responds to local housing needs. Sites of between 10 and 40/50 dwellings have delivered significant amounts of affordable housing. Last year 43% of the affordable housing delivered in Cotswold District was on sites of 50 units or less in total. This year it is set to increase to over 60% of delivery.

The proposed change jeopardises the Council's strategy for meeting affordable housing needs in the district through its Local Plan. The District has continued to deliver market and affordable housing at an accelerated rate for a number of years due to the viability of the housing market in the area. As a rural district of which 80% is situated in the Cotswold AONB, sites of less than 50 units are the backbone of sustainable delivery, and consequently affordable housing delivery. The proposed change will make it extremely difficult for the Council to achieve both its own objectives as well as the underlying ethos and objectives of the NPPF of creating mixed and balanced communities and supporting a prosperous rural economy. The delivery of affordable housing in rural areas plays a significant role in ensuring that local communities remain sustainable. The provision of half a dozen affordable homes can ensure that local people can remain in the communities they grew up in, maintaining the community and viability of local facilities and services. The provision of affordable housing ensures that employers have access to a workforce and therefore helps to support the growth of the local economy.

While the government's concerns regarding the viability of small scale housing sites are noted, the Local Planning Authority's housing policies which seek to secure affordable housing contributions, are based on whole Plan and individual site viability assessments. At present, schemes where developers consider it unviable to proceed can, subject to viability testing, have contributions adjusted or waived completely if necessary.

Where developers cite viability as a concern, viability testing currently allows a reasonable profit margin to be achieved. The proposed changes will likely inflate developers profit beyond a typical profit on GDV of 15% - 20%, rather than accelerate delivery.

The Council considers that its Local Plan policies in relation to affordable housing are not preventing the delivery of small scale housing sites, and that the proposed threshold change would result in a significant reduction in the provision of much needed affordable housing for this rural District as well as detrimentally affecting the long term sustainability of its communities.

**Q18: What is the appropriate level of small sites threshold?**

- i) Up to 40 homes**
- ii) Up to 50 homes**
- iii) Other (please specify)**

Whilst the government's concerns regarding the viability of small scale housing sites are noted, the Local Planning Authority's housing policies which seek to secure affordable housing contributions, are based on evidence demonstrating that such policy requirements are viable.

The Council considers that existing thresholds should be retained, particularly in rural districts, where large scale development and therefore opportunities for delivery of affordable housing are limited.

**Q19: Do you agree with the proposed approach to the site size threshold?**

No

The Council believes it will be detrimental to the delivery of affordable housing in the District for the anticipated timescale and at a time where more genuinely affordable housing is required to support local economy workers rather than less.

**Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?**

The Council does not consider that the threshold should be raised.

The proposal would have a detrimental impact on the supply of affordable housing for

a much longer period than 18 months. Owners of sites with planning permission that have an affordable housing contribution could potentially reapply for planning permission to attain the affordable housing exemption. Furthermore, sites that would otherwise have been expected to provide affordable housing in, for example, the next 5 to 10 years would be incentivised to be brought forward sooner in order to capitalise on the reduced financial burden of not having to provide affordable housing, thus impacting on the delivery of affordable housing long after the proposed 18-month period.

The consultation highlights that proposals will be implemented for a time-limited period and lifted as the economy recovers from the impact of Covid-19, with government monitoring prior reviewing the approach. The Council is concerned how the effects will be monitored. Current market reports highlight an increase in sales values, particularly for Cotswold District, and as much demand as ever from buyers as restrictions have eased.

If the Government is minded to implement the proposals then the Council considers additional measures should be introduced to ensure land values and developer profits are not inflated in the short term and that, once planning permissions are obtained, that sites are not land banked for 3 years before commencing development.

**Q21: Do you agree with the proposed approach to minimising threshold effects?**

The Council is concerned that the proposed raising of the threshold will encourage developers to artificially split larger sites into phases. Whilst the consultation states the intention to introduce measures to minimise the impact of this potential threshold effect, no detail has been provided yet on how this will be achieved. The Council is concerned that suggested measures may be difficult to apply in practice when determining individual planning applications.

**Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?**

Yes

The Council agrees that in designated rural areas the current threshold should be maintained.

The Council also proposes that the definition for designated rural areas should follow the designation for the purposes of section 17 of the Housing Act 1996 (the right to acquire) and section 1AA(3)(a) of the Leasehold Reform Act 1967 (additional right to enfranchise). The above definition would safeguard wider rural parishes, not included in the Cotswolds Area of Outstanding Natural Beauty, but where the size and number

of developments are still constrained and the loss of the already limited opportunities for new affordable housing provision would be detrimental to the sustainability and economy of those communities.

**Q23: Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?**

The Council has no further comments to make on supporting SMEs.

## **Extension of the Permission in Principle consent regime**

**Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?**

No - environmental issues are far more widespread than just the ones that need EIA or HRA.

Environmental issues could be such that they prevent a development from coming forward and should not be left to after Permission in Principle has been granted.

**Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.**

This question doesn't come up very often in Cotswold District because the demand is for residential development. The biggest difficulty in this context is trying to protect employment land from becoming residential.

Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

Sufficient information should be submitted to ensure that the LPA can make the right decision on whether the site is appropriate for development - will it have an unacceptable impact on the landscape / biodiversity? Will it make a positive contribution towards tackling climate change, etc.?

The PIP process makes it much less clear to LPAs and applicants as to what information is reasonably necessary to consider them. 'In principle' is rarely an appropriate term in development management in rural areas where matters of detail are often the determining factor.

**Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.**

This exposes one of the difficulties with the PIP process. In rural areas, the acceptability of the principle of development very often comes down to the matter of detail, such as height. It is important to understand the parameters which local authorities can apply to assessing PIP applications, particularly to make the process faster and more resource friendly.

Account needs to be taken of the effect of the proposed PIP system, as the situation will be different in rural areas than urban areas. This, for example, includes resources, sensitivities and other general planning considerations.

**Q28: Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:**

- i) required to publish a notice in a local newspaper?**
- ii) subject to a general requirement to publicise the application or**
- iii) both?**
- iv) disagree**

**If you disagree, please state your reasons.**

Disagree

Advertisement should apply the same approach as for planning applications. Why wouldn't it from a community perspective? However, if the outcome of the White Paper resolves to reduce physical adverts, that would be an improvement, so long as this does not have a detrimental impact on people who have limited means or skills to access digital mediums.

**Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?**

Yes and no

Fees would need to reflect the development capacity of the site in that scenario, but

would help to recover fees for lower density schemes that often involve just as much officer resources.

**Q30: What level of flat fee do you consider appropriate, and why?**

It is difficult for Cotswold District Council to find a flat fee an acceptable or beneficial idea. Areas such as the Cotswolds require significant resources to assess the many small site applications that we receive, which still require professional expertise to understand and assess their impacts in this heavily constrained area. This is opposed to larger sites with lower sensitivities that are more typically found in urban areas (e.g. a large brownfield site in an urban area would have far fewer constraints to be taken into account, which would be expected to be reflected in the fee).

**Brownfield Land Registers and Permission in Principle**

**Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.**

Cotswold District Council sees that value of bringing forward brownfield sites ahead of greenfield sites wherever possible. However, brownfield sites can very often have considerable value as undeveloped land. For example, they may provide important habitats for species, such as the unimproved grasslands that are often found in former airfields to the unique habitats that former queries provide.

Such issues need to be fully understood before Permission in Principle is granted.

**Additional guidance to support implementation**

**Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.**

As much clarity as possible is needed to make decisions and to give both the Council and developers certainty. The more vague the guidance, the more time and resources are needed and the potential there is for appeals. Less guidance means more uncertainty and more debate.

There also needs to be greater communication and understanding with communities

so they can understand their role in the PIP process and so they can have realistic expectations about the outcomes.

**Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?**

It should not be assumed that PIP process produces a significant saving of council resources. There are many subtleties that require detailed officer input with the PIP process, the same as conventional planning applications.

**Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.**

Anything that helps to give certainty and clarity to landowners and developers, which is always what they are after, is a good thing. If a land valuation exercise is quicker and perhaps more cost effective than an outline planning application, then there would be benefits. The quality and robustness of the decision, however, are paramount. This needs to be taken into consideration when setting the statutory timescales for determination.

## **Public Sector Equality Duty**

**Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty?**

The digitalisation of the planning application advertisement process and Local Plans should not discriminate against people who cannot afford to access a computer or a smartphone or do not have the skills to use them.

**If so, please specify the proposal and explain the impact. If there is an impact –**