# **Billericay Town Council NPPF Consultation Response Document**

### CHAPTER 3 – PLANNING FOR THE HOMES WE NEED

### **Question 1**

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

Answer – Yes.

This will limit options of Planning Authorities and force use of the Standard Method only. The driver here is to ensure everyone uses the same calculation.

### **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?

Answer - Yes

If the changes of December 2023 are reversed, then this is a given.

### Question 3

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

Answer - No.

There is enough inflation being built into the calculations.

### Question 4

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

Answer - No.

By removing this paragraph higher density of housing in urban areas is being forced even when out of character. Bearing in mind the current densities being proposed and built, this is going to make things worse.

### **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?

Answer - No

This proposal is unclear and not properly explained.

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

Answer - Yes

This appears sensible but should not be necessary if a Proper Local Plan is in place.

### 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?

Answer - No

Providing sites is no guarantee of housing delivery numbers. This appears to be another way to inflate figures and a misleading indicator of progress. Unless legally mandated, Developers will build at the rate they want to build to get the prices they need

### **Question 8**

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

Answer - Yes

### **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?

Answer - No

Imposing a 5% "buffer" to the required Housing need, on top of the 20% buffer already in place is not justified. The 20% buffer already means that 5 year supply figures contain an additional year's worth of home building. So six years of supply within 5 years.

### **Question 10**

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

Answer - No

This should be zero.

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

Answer - Yes

**Pointless** 

# **Question 12**

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

Answer - Yes

### **Question 13**

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

Answer - Yes.

Focus needs to be on ensuring infrastructure is delivered to prove viability. Infrastructure must be in place in the early stages of development not left to the end and forgotten.

Need to think about how we want delivery of infrastructure when dealing with scattered development plots and ensure it is delivered.

### **Question 14**

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

Answer - Yes

- Once a Development is approved, thought is needed as to how the Council
  can ensure that they deliver the number of homes expected each year.
   Developers will normally deliver at the speed they want, in order to maximise
  returns.
- Local Plans will define land that can be used for Development. This is often scattered over the area covered by the Plan. How can this be better managed to deliver a cohesive development, supported by infrastructure.
- There needs to be guidance on how and when Infrastructure is provided to support the new residents. At what point is a Town saturated with failing Infrastructure?
- You cannot discuss "Building the Homes we Need" without discussing how we deliver the infrastructure to support these homes.

# CHAPTER 4 - A NEW STANDARD METHOD FOR ASSESSING HOUSING NEED

### **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?

Answer - Yes.

Housing Projections are too open to manipulation and can be made to prove anything. Housing Stock has grown annually by 0.89% for the last 10 years. Housing Stock is assessed by ONS annually.

### **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?

Answer - Yes.

Nationally this figure has fallen for the last 3 years since 2021.

### **Question 17**

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

Answer – No

Increasing the multiplier form 0.25 to 0.6 is not justified and no information is provide on why 0.6 is appropriate. This is pure inflation. It must be explained why 0.6 is an appropriate figure and then ask if this is appropriate.

The assumption is that if more houses are built, the price will become more affordable. This is not how the housing market works. Building more houses may well restrict the rate at which house prices rise, but it does not necessarily improve affordability. Many other factors impact affordability, such as Wages, Taxes, Property Speculation and Private Landlords. The best way to improve affordability is by making legal provision for "affordable housing" and ensuring it is delivered.

This can only be properly addressed by building the right housing at the right price and Developers will not do that unless forced.

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?

Answer - No

### **Question 19**

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

Answer - No

# CHAPTER 5 – BROWNFIELD, GREY BELT AND THE GREEN BELT

### Question 20

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

Answer - No.

There is no wording for the proposed changed provided. No idea what a brown field passport is.

### 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?

Answer - No.

There is no proper definition of Previously Developed Land provided and the little information that is provided is worrying.

On this basis it is reasonable to assume that PDL will mean whatever the Planning Authority wants and not be limited to petrol stations and car parks.

Does this mean Country Parks with a Car Park is now PDL and therefore at risk of Development?

We cannot agree with the proposed change unless we can read what is proposed.

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?

Answer - Yes.

We need to see the definition of PDL and not comment until such time as that definition is published. PDL could remove protection of large areas of Green Belt. Often the development of land pre-dates Green Belt and is critical to both the land and the Green Belt itself. Farms being the most obvious example. We cannot use PDL without clear definition.

The question about glasshouses is bizarre. This could easily be covered in a properly worded definition.

### **Question 23**

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

Answer - No.

- Define PDL properly
- Define who decides what land is Low Harm in the first place?
- Consult on results of Green Belt Review

### **Question 24**

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

Answer - Yes.

- Remove or better define PDL
- Define high performing
- Ensure there is an appeal process against removing high performing Green Belt to ensure it is possible to challenge.

### **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?

Answer - Yes.

Remove or better define PDL or remove it from Grey Belt definition and define Grey Belt properly.

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?

Answer - Yes

- 4 considerations are listed, 2 of which are already covered by Green Belt purposes.
- The other 2 seem to be very similar and closely relate to PDL.

### **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?

Answer - No

### **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?

Answer - Yes.

This is the only logical way to do it. The issue is still PDL.

# **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?

Answer - Yes.

Totally agree. Unfortunately, no draft of changes proposed were provided so cannot comment on what it will say.

### **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?

Answer - No.

This surely circumvents the whole Local Plan.

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?

Answer - No

Cannot see any draft text.

### **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?

Answer - No

Will need to see what these proposals are.

### **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?

Answer – Yes

The current assessment of need seems to impose more sites on Councils who already provide sites and not on those who do not. This is not fair or equitable.

### **Question 34**

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

Answer - Yes.

The idea is good, but we need to see what "affordable housing" is defined as. Current definition is useless. Similarly, we need to know what Social Rent is.

The problem we have is affordability and building more houses is not the answer. We need the right houses in the right places and we need the necessary infrastructure in place to make them viable.

Developers will fight this as they don't make enough profit on "affordable homes".

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?

Answer – Yes

Not sure what the answer is. You have asked 2 questions which contradict a single answer.

Yes, It should apply to all areas where Green Belt is sacrificed.

No, there should be no exceptions for low value land in the Green Belt.

# **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?

Answer -Yes.

### **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?

No Comments.

### **Question 38**

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

No Comments.

### **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?

No Comments

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?

No Comments

### **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?

No Comments

### **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?

No Comments

# **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?

Answer - Yes.

Any land that has been released, that was either Green Belt or re-assessed as Grey Belt must be subject to the Golden Rules. If Affordability is given such prominence, then it needs to be reflected in providing sufficient Affordable homes on land sacrificed from the Green Belt.

### **Question 44**

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

Cannot find the comments.

### **Question 45**

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

No Comments

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

Answer - Yes.

 We need better definition of many concepts, buzzwords and phrases used in these proposals.

# CHAPTER 6 – DELIVERING AFFORDABLE, WELL-DESIGNED HOMES AND PLACES

### **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. All levels of housing needs should be included in any housing build policy, for any given local planning authority

### **Question 48**

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

No. How will developers/builders, of new sites, be 'persuaded' to provide 'cheap homes' when larger, more expensive houses will increase their profit margin? If the need is to supply a given number of affordable homes per development is taken away, how do people get onto to the ownership ladder? There is a need for 'starter style' houses - which by the way - should not be allowed to be extended in the future so that they remain affordable starter homes for the next potential owner

# **Question 49**

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

Yes. Similar response to Q48 - a percentage needs to be defined to ensure First Homes are available to first time buyers. Perhaps the percentage figure could be revised, maybe a bit high at 25%?

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

For discussion. Trying to find the definition of 'exception sites' in this context. Any ideas? First Homes/Starter homes are required **in all areas** so that the first step into home ownership is available and at reasonable prices, so that people are not forced out of the areas they have lived in and want to continue to live in due to lack of availability and high cost

### **Question 51**

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

For discussion. Not sure that would work in most areas. Snobbish maybe but most home buyers would probably prefer to be living within an estate/area that was made up of like home buyers as opposed to a mix of owner/rental/council etc housing. Differing aspirations of differing occupants

# **Question 52**

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

For discussion - but- perhaps small 'packets' of dwellings interspersed within a larger area, not large buildings or groups of buildings setting up potential 'ghetto' type environments. Difficult one this

# **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?

For discussion. Similar response to that of Q52. Should there be smaller pockets of housing covering a larger area?

### **Question 54**

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

For discussion. Maintain a minimum percentage of these types of houses that have to be included in build sites where the build sites provide more than a given number of residences/dwellings

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

No Comment

**Question 56** 

Do you agree with these changes?

No Comment

**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?

No Comment

### **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?

I believe that small sites are being allocated and built on within our area as long as they abide by planning regulations as they stand/stood

### **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. Well designed, although still subjective, I believe is easier to assess

# **Question 60**

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

Yes, for discussion

# **Question 61**

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

No

# CHAPTER 7 – BUILDING INFRASTRUCTURE TO GROW THE ECONOMY

# **Question 62**

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

Qualified Yes.

The purpose of the proposals is supported insofar as economic growth is best secured through investment in emerging and high tec industries. However, it is vague on the specific expectations on Planning authorities in this regard and what, if any, incentives or penalties there are for ensuring compliance?

There is an obvious constraint in terms of there being land available for new largescale developments due to lack of Brownfield sites and suitable Green Belt. Also, lack of a skilled workforce for new industries will require long-term resource planning.

### Question 63

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

Yes. The vision for key areas of development set out in the consultation document are limited in scope and ambition. Nobody will argue against the three areas identified, but the vision for national industrial growth should be wider and encompass. For example;

- Green technologies
- Life sciences
- Carbon reduction technologies
- Advanced vehicle engineering
- Organic farming and horticulture
- Hydro engineering
- Nuclear energy
- Home energy reduction

### **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?

Yes.

Overall, whilst we would support in principle such developments, there is limited scope locally due to poor access, lack of suitable land and largely unskilled workforce. Large scale commercial developments are likely to impact on more than

one Planning Authority and their Residents. Many will have regional or national significance in terms of employment, logistics and technology.

However, there needs to be more clarity in the NPPF over the qualifying criteria for NSIP consenting and the process for ensuring local views are taken into account. This will be particularly necessary if Green Belt is to be utilised. Any LSIP process that fails to adequately reflect and incorporate local views and priorities is likely to meet significant local resistance and potential legal challenge.

### 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?

Yes. Scale should be determined by type of development and commercial necessities and therefore it is difficult to legislate to a specific scale?

### **Question 66**

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

No. See above

# **CHAPTER 8 – DELIVERING COMMUNITY NEEDS**

### **Question 67**

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

Yes.

There is no disputing the sentiment that 'healthy communities' require supporting public services and social infrastructure to thrive. Where large scale housing developments are planned it is incumbent on the planning authorities to plan for and facilitate the delivery of additional good quality social infrastructure within the agreed Local Plan. Based on overall population growth within planned development areas, negotiation for the delivery of this provision along with any land required should be a prerequisite to granting permission for housing schemes to Developers.

The phasing of infrastructure delivery needs to be coordinated with statutory agencies involved in delivering services, relevant community groups and Developers to ensure services are located, planned, funded and available in advance of envisaged population growth. A strategic plan for infrastructure delivery must be a key feature of the Local Plan. By having a stake in supporting infrastructure delivery as a prerequisite to planning authorisation Developers will be incentivised to progress housing schemes.

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

Qualified Yes.

However, the scope of services required to deliver 'healthy communities' is wider than Post 16 Education and Early Years Education (as set out in the Proposal) and should be expanded to include all the following;

- Education (Primary, Secondary & Post-16)
- Social Services
- GP Services
- Elderly Care
- Child Care
- Sport & Green Space Recreation
- Bus Services
- Commercial Retail
- Broadband

### **Question 69**

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

### Qualified Yes.

Insofar that 'vision-led' transport planning is envisaged to include the involvement of local communities in the planning process we see this as a step in the right direction in achieving not only local consensus but also enabling innovative schemes aimed at improving the quality and efficiency of local transport solutions.

Roads are already overcrowded at peak travel times, bus services inadequate in coverage and frequency to replace car usage, and rail travel is adequate but expensive.

Large scale additional housing will intensify the above shortcomings. More journeys from peripheral developments for commuting, school or shopping will create more congestion, extend journey times, and exceed capacity of current provision at peak times.

More detail is needed on exactly what 'vision-led' planning will look like is needed, who will pay, who will deliver?

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

(a) Yes.

By ensuring transport policy informs local plans. For example;

- Investment in cycle lanes and supporting infrastructure.
- Ensuring ongoing maintenance and enhancement of footpaths, footbridges and bridleways encourages walking.
- Expansion and improved frequency of local bus services with fare subsidies to promote usage.
- Greater use of technology in bus shelters and information points for local mapping, timetabling and information.
- (b) Qualified Yes.

This is a much wider socio-economic issue than can be adequately addressed in local planning policy outside of those measures for healthy communities outlined above. Active travel and provision of sports and recreational facilities are key enablers to more active lifestyles which can play a part.

Also, as mentioned in the proposals, planning guidelines to restrict number and placement of 'junk' food outlets might have some marginal impact?

### **Question 71**

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

Promote healthy lifestyles and eating habits by allocating more good quality land to rental allotments with incentives for Residents to 'grow their own' by promoting horticultural education and healthy eating through local social markets for excess produce.

# CHAPTER 9 – SUPPORTING GREEN ENERGY AND THE ENVIRONMENT Question 72

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

No.

Whilst we support renewable energy generation to achieve a reduction in greenhouse gases, onshore wind projects are only viable when the generated power is effectively transmitted into the National Grid. If the means to achieve this results in long-term damage to the environment, biodiversity and visual amenity then local

planning authorities and their Residents must be intimately involved in scrutinising and approving such schemes.

The impact of such schemes will differ depending on local circumstances, population impacted, geophysical topography, and heritage assets and it is therefore appropriate they should be subject to local review and consent.

### **Question 73**

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

Qualified Yes.

Support, in principle, renewable and low carbon solutions and their determination through the local planning process.

Inevitably there are challenges. Supply of suitable land for large scale projects, weighing loss of valuable farmland against the need for food production being just one.

We would support local planning policy to mandate installation of solar panels to all new housing and commercial developments, along with heat pumps and rainwater recovery systems.

### **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. All such places should be protected. Unclear what 'compensatory mechanisms' are?

# **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 important that as many small/medium projects are subject to local consultation and determination where local knowledge and interests will play a key role in informing the consenting process.

# **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. As above.

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

The proposed seem reasonable.

### **Question 78**

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

National policy should be encouraging local planning to reflect need for low carbon solutions to be integrated into their Local Plans. This should include the following examples;

- Low carbon construction methods
- Installation of solar panels on all new buildings
- Heat pump installation on all new buildings
- Community heating schemes where Residents support.
- EV charging points on all new buildings and expansion in community
- Low carbon bus services
- Ensure compliance with biodiversity net gain regulations
- Rainwater recovery systems on all new developments
- Increased tree planting targets on all development sites
- Implement 20mph speed limits in urban zones.

### **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?

Don't know? Suspect not well developed?

# **Question 80**

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

Probably Yes. Improved flood mitigation and management will be required if Green Belt is to be built over. Cooperation and engagement between Planning Authorities and the relevant agencies will need to improved and reflected (and costed?) in the Local Plan.

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

No.

### **Question 82**

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

No. We see no major benefit in removing the footnote. Retention of agricultural land is vital to sustaining UK food security.

### **Question 83**

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

Yes. Promote healthy lifestyles and eating habits by allocating more good quality land to rental allotments with incentives for Residents to 'grow their own' by promoting horticultural education and healthy eating through local social markets for excess produce.

### **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?

Yes. First, get water companies to fix leaks from current system and invest to stop polluting rivers and waterways. Second, in local planning, improve and implement water recycling and rainwater capture on all new developments. Third, nationally, establish a National Water Grid to enable transfer of supplies around country to offset shortages.

# **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?

Yes. First, get water companies to fix leaks from current system and invest to stop polluting rivers and waterways. Second, in local planning, improve and implement water recycling and rainwater capture on all new developments. Third, nationally, establish a National Water Grid to enable transfer of supplies around country to offset shortages.

### **Question 86**

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

No.

### CHAPTER 10 – CHANGES TO LOCAL PLAN INTERVENTION CRITERIA

# **Question 87**

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

No. My view is that the local governing body are in the best place for determining the area build requirements. Leave the intervention policy as it is, just make sure local authorities meet their commitments and timings

#### 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

# CHAPTER 12 - THE FUTURE OF PLANNING POLICY AND PLAN MAKING

#### Question 103

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

Yes. Anything that progresses the Local Plan and conclude its completion at a quicker pace

# **Question 104**

# Do you agree with the proposed transitional arrangements?

Yes. If it speeds up finalising the Local Plan, as long as the final result is a well planned, constructive outcome that gets support and/or acceptance of its communities, not a political 'slap in the face' for some communities/residents due where they live