

City of Durham Parish Council

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28 September 2020

Access details for Zoom Planning Committee meeting:

Join Zoom Meeting

<https://us02web.zoom.us/j/81781464466>

Meeting ID: 817 8146 4466

Dear Planning Committee Member,

In accordance with both the Local Government Act 1972 and the Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of local authority and Police and Crime Panel meetings) (England and Wales) Regulations 2020, I hereby give you notice that a meeting of the **Planning Committee** will be held in **via Zoom** on **Friday 2 October 2020 at 2pm** to transact the following business:

- 1. Welcome and apologies**
- 2. To receive any declarations of interest from members.**
- 3. To receive and approve as a correct record the minutes of the meeting on 18 September 2020.**
- 4. To receive any public participation comments on the following agenda items.** Please email the Parish Clerk parishclerk@cityofdurham-pc.gov.uk to register to speak.
- 5. Matters arising:**
 - a. To approve responses on the following planning applications:**

DM/20/02278/FPA | Proposal for a single storey rear extension, rear double dormer and various alterations to a recently established HMO use class C4. | 8 High Wood View Durham DH1 3DT

DM/20/02549/FPA | Demolition of 9 redundant garages | Bakehouse Lane Durham City Durham DH1 1JS

DM/20/02524/FPA | Construction of 1.8m wide access path. | Low Burnhall Woodland Darlington Road Durham DH1 3ST

DM/20/02585/AD | Individual internally illuminated built-up letters on existing fascia, non-illuminated Heritage Projecting Sign and printed, frosted M-Pattern window vinyl and printed ATM vinyl surround | 76 Saddler Street Durham DH1 3NP

b. To consider the list of unspent S106 moneys

6. To consider these planning applications (the date in brackets is the deadline to call to committee):

a. To note:

DM/20/02469/LB | Replace windows, doors and rooflights and redecorate the fascia and cornice | 201 Gilesgate Durham DH1 1QN (15 October)

DM/20/02571/LB | Replace electricity cable including 3no 50mm holes within the internal entrance corridor and floor of bedroom 1, holes will be fire stopped and boxed in | 13 South Bailey Durham DH1 3EE (22 October)

b. To consider making representations

DM/20/02491/FPA | Change of use of part of ground floor and first and second floors to 9 studio apartments (use class C3) and one small house in multiple occupation (HMO) (use class C4). | 18 Silver Street Durham DH1 3RB (22 October)

DM/20/02665/LB | Listed building consent for individual internally illuminated built-up letters on existing fascia, non-illuminated Heritage Projecting Sign and printed, frosted M-Pattern window vinyl and printed ATM vinyl surround. | 76 Saddler Street Durham DH1 3NP (22 October)

DM/20/02667/FPA | Installation of new shop front windows behind existing roller shutter and new single entrance door incorporating glazed panel | Kiosk Adjacent To 7 North Road Durham DH1 4SH (15 October)

DM/20/02702/FPA | Construct 2 no new build 1 bed apartments on the upper terrace of the site at Grove House. | Grove House Grove House Drive Gilesgate Durham DH1 1UP (22 October)

7. Neighbourhood Plan

Progress report on preparing the version for referendum

8. County Durham Plan:

- a. To consider the schedule of applications where a further representation might be made
- b. To approve the supplementary representations already made.
- c. Whether the new Policy 16.3 merits the extension of the Article 4 Direction to the whole Parish.

9. Government consultation on proposed changes to the planning system – report included.

10. Dates of future meetings

Friday 16 October 2020 - 14.00 to 16.00 hrs – via Zoom.

Friday 30 October 2020 - 14.00 to 16.00 hrs – via Zoom.

Due to the confidential nature of the following items, in accordance with Section 100(A)(4) of the Local Government Act 1972, the press and the public will be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A of the LGA 1972 Act and section 1(2) of the Public Bodies (Admission to Meetings) Act 1960. At this point in time the press and the public will be asked to leave the room.

11. Common land at the Sands

To consider correspondence from Durham County Council.

And, pursuant to the provisions of the above-named Act, I Hereby Summon You to attend the said meeting.

Adam Shanley
Clerk to the City of Durham Parish Council

City of Durham Parish Council

Minutes of Planning Committee meeting held via Zoom at 14:00 pm on Friday 18th September 2020.

Present: Cllr R Cornwell (in the Chair), Cllr J Ashby, Cllr J Elmer and Cllr G Holland

Also present: Parish Clerk Adam Shanley and Cllr E Ashby and Mr John Lowe (members of the public).

1. Welcome and apologies

Apologies were received from Cllrs V Ashfield and L Brown

2. To receive any declarations of interest from members.

None received.

3. To receive and approve as a correct record the minutes of the meeting on 4 September 2020.

The minutes of the meeting held on 4th September 2020 were unanimously **agreed** as a true and accurate record of proceedings.

4. To receive any public participation comments on the following agenda items.

Mr John Lowe advised that he was attending to hear discussions on new planning applications.

Cllr E Ashby advised that she was attending to hear discussions on application DM/20/01107/FPA.

5. Matters arising:

a. To approve responses on the following planning applications:

DM/20/01983/FPA | 2no. additional dwellings located within Phase 2A | Mount Oswald (Phase 2A) South Road Durham DH1 3TQ. The Committee **approved** the response to this application.

DM/20/02258/FPA and **DM/20/02259/LB** | Change of use from hotel to student accommodation comprising of 8 one bed studio apartments and 7 bedrooms with access to communal facilities | 34 Old Elvet Durham DH1 3HN. The Committee **approved** the responses to these applications.

DM/20/02277/FPA | Change of use of the first floor from (A2) offices to form 2no. 1 bed self-contained studio student accommodation (C3), 2no. 6 bed student HMO (C3) and 1no. 7 bed large student HMO (Sui-Generis) with bin store and cycle store extension. | The Crossgate Centre Alexandria Crescent Durham DH1 4HF. The Committee **approved** the response to this application.

DM/20/02394/FPA | Change of use from two bed dwelling (C3) to five bed roomed HMO (C4) including single and two storey rear extensions | 19 Mistletoe Street Durham DH1 4EP. The Committee **approved** the response to this application.

b. To consider the following application, approved at the Area Planning Committee on 8 September 2020:

DM/20/01107/FPA: Land To The West Of The White House, Newcastle Road, Crossgate Moor, Durham, DH1 4HZ | Resubmission of DM/20/00387/FPA for the erection of a single House in Multiple Occupation (Use Class C4). The Committee expressed disappointment at the proceedings of the Area Planning Committee on 8th September where this application was considered. In particular, the Committee wished to stress that, in their assessment, Policy 16.3 of the draft County Durham Plan does indeed carry weight. It was **agreed** that Cllr R Cornwell would investigate similar cases across the country where the relevant local plan is at the same or similar stage as that for County Durham in order to assess what weight the Planning Inspectorate gave to relevant policies with the plan. It was also **agreed** that a corporate complaint should be raised with DCC regarding the procedure followed on the determining of this application.

c. To approve the letter sent on our behalf to the County Council regarding the Common Land at The Sands. Members **approved** the letter sent to DCC regarding the continued occupation and fencing off of the common land at the Sands.

6. To consider these planning applications (the date in brackets is the deadline to call to committee):

a. To note:

DM/20/02390/AD | 2no. fascia signs internally illuminated lettering via white LED with aluminium black light box | 85 North Road Durham DH1 4SP (22 September). It was **agreed** to note this application.

DM/20/02545/TPO | Remove curved branch to 1no. sycamore (T1), remove branch to 1no. Willow (T2), reduce height by 2m and reshape to 1no. Plum, prune 2no. Ash, fell 1no. Cypress and prune to crown lift to 1no. Sycamore | 7 Potters Close Nevilles Cross Durham DH1 3UB (2 October). It was **agreed** to note this application.

DM/20/02565/FPA | Install 1 no. roof light to rear roof slope | 27 Albert Street Durham DH1 4RL (5 October). It was **agreed** to note this application.

DM/20/02568/TPO | Remove up to 12 branches to 1no. Sycamore (T1), remove up to 8 branches to 1 no. Beech (T2) and remove up to 4 branches to 1no. Sycamore (T3) | 2 Almoners Barn Durham DH1 3TZ (30 September). It was **agreed** to note this application.

DM/20/02584/HPN | Prior notification for the erection of a single storey extension projecting from the rear of the original dwellinghouse by 3,600mm, with an eaves height of 2,500mm and maximum overall height of 3,600mm | 60 Old Dryburn Way Durham DH1 5SE (30 September). It was **agreed** to note this application.

b. To consider making representations

DM/20/02278/FPA | Proposal for a single storey rear extension, rear double dormer and various alterations to a recently established HMO use class C4. | 8 High Wood View Durham DH1 3DT (1 October). It was **agreed** to object to this application and also to call this in for consideration at the Central and East Area County Planning Committee. Cllr G Holland **agreed** to draft the objection to this application.

DM/20/02458/FPA | Installing 2 No velux windows to the front roof slope
Installing 2 No velux windows to the rear roof slope | 29 Lawson Terrace Durham DH1 4EW (1 October). It was **agreed** to note this application.

DM/20/02524/FPA | Construction of 1.8m wide access path. | Low Burnhall Woodland Darlington Road Durham DH1 3ST (29 September). It was **agreed** to write a letter of support for this application. Cllr R Cornwell **agreed** to draft the response to this application.

DM/20/02526/FPA | Formalisation and extension of the existing car park, to include re-surfacing, new boundary treatment, drainage works such as culverts, gullies and soakaway to carry surface water off the car park. | Car Park Low Burnhall Woodland Darlington Road Durham DH1 3ST (2 October). It was **agreed** to note this application.

DM/20/02549/FPA | Demolition of 9 redundant garages | Bakehouse Lane Durham City Durham DH1 1JS (8 October). It was **agreed** to note this application. It was also **agreed** that these garages be proposed to be added to the list of assets of community value.

DM/20/02585/AD | Individual internally illuminated built-up letters on existing fascia, non-illuminated Heritage Projecting Sign and printed, frosted M-Pattern window vinyl and printed ATM vinyl surround. | 76 Saddler Street Durham DH1 3NP (8 October). It was **agreed** to object to this application. Cllr J Ashby **agreed** to draft the objection to this application.

7. Neighbourhood Plan

- a. Correspondence with County Council regarding weight to be given to the Plan.** The Chair advised that the advice provided to County Councillors regarding the weight which may be applied to the Neighbourhood Plan was incorrect and it was **agreed** that the Clerk and Cllr R Cornwell draft a letter to go to County Councillors clarifying the situation.
- b. Progress report on preparing the version for referendum.** The Chair advised that he, Ms Sue Childs and Mr John Lowe were busy finalising the amendments to the Plan as recommended by the Examiner and the work on this is hoped to be completed by the end of September. It was agreed that a report should go to the October Full Council meeting on this and that clean versions of the final Plan be printed for Members of the Parish Council and Members of the former Neighbourhood Plan Working Group.

8. S106 money allocated for affordable housing

The Chair advised that he was aware of a substantial amount of Section 106 funding available in the City of Durham parish for affordable housing. The Clerk advised that he had requested a breakdown of all Section 106 funding available in the parish from the Planning Development Manager at DCC and hoped to provide a report on this at a future planning committee meeting. It was **agreed** that the Clerk should also investigate which social housing providers currently operate in Durham City in order to assess if there is any scope for any of them accessing this funding to help deliver more affordable housing in the parish.

9. Traffic Regulation Orders

Members considered proposals by DCC for parking restriction amendments in Durham South East on Elvet Crescent.

It is proposed that the existing loading only area is removed to be replaced by the introduction of Permit Holders Only 'C', Mon-sat, 8am-6pm at the location indicated in the map below. Businesses of the area will still be able to load and unload on the current existing No Waiting At Any Time parking restrictions.

It was **agreed** to note this consultation without making further comments.

10. Dates of future meetings

Friday 2 October 2020 - 14.00 to 16.00 hrs – via Zoom.

Friday 16 October 2020 - 14.00 to 16.00 hrs – via Zoom.

There being no further business, the Chair thanked Members of the Committee and members of the public for their input and attendance and closed the meeting.

Signed,

Chair of the City of Durham Parish Council Planning Committee

ITEM 9: CONSULTATION ON PROPOSED CHANGES TO THE CURRENT PLANNING SYSTEM RESPONSE OF THE CITY OF DURHAM PARISH COUNCIL

The City of Durham Parish Council has prepared a Neighbourhood Plan and has participated fully in the preparation and Examination of the County Durham Local Plan. It vigorously uses its right formally to comment to the local planning authority - Durham County Council - on planning applications, and several of its Councillors are experienced in planning matters over decades. It recognises the frustrations felt by applicants and by communities over some aspects of the planning system, and supports measures that bring the system up to date with modern challenges, with new ways of working, and with striking the right balance between speed and democracy.

Responses so far to the accompanying White Paper on 'Planning for the Future' demonstrate that it is not the planning system that is the obstacle to achieving the Government's target of at least 300,000 new dwellings per year:

- There are one million un-built new dwellings with planning permission
- 90% of planning applications are approved each year
- Developers store planning permissions (a) as quotable assets and (b) to prevent supply outstripping demand and causing prices to fall
- The last time 300,000 dwellings were built in a year was 1969-1970; 135,000 of these were built by local authorities for rent

It is finance, not planning, that is the blockage, notably:

- insufficient funding for local authorities to build at least 100,000 new social dwellings per year
- ten years of austerity reducing household incomes and ability to moving up the housing ladder
- insufficient funding for first-time buyers, and
- excessive profit levels for developers

Durham city is small - the whole urban area is about 35,000 in population; within that, our Durham City Parish Council area has a population of about 28,000 (of whom about 18,000 are Durham University students). Many hundreds of new dwellings have been approved within and on the edge of the city in the past decade and have been built, virtually all in the so-called 'executive housing' sector. Increasing the calculated minimum quantity of local housing need and releasing more land for housing development does not, on the evidence, create the housing that local people need.

There are four sections of the consultation text that we wish to comment upon before turning to the specified questions, as follows.

Paragraph 9: "*However, identifying sufficient land so that the market is not prevented from delivering the homes that are needed is vitally important to prevent the under-delivery of the past from continuing to happen.*" We read this as implying that under-delivery of the past was a consequence of an insufficiency of land identified for housing development. There may well have been local insufficiencies but there is no doubting that the greatest reasons were financial; indeed, paragraph 46 says exactly that: "*Although polling shows that 87% of people would prefer to own a home given a free choice, high prices, high deposits and difficulty accessing mortgage finance still mean that far too many people are denied this opportunity.*" We agree with that assessment and fundamentally disagree with the earlier quote from Paragraph 9.

Paragraph 21: *"However, household projections, which are based on freely and publicly accessible data available at a local authority level, are still the most robust estimates of future growth trends. Projections have been used for decades in the planning system as a basis for future housing land requirements due to their simple and relatable concept of linking housing growth to the population."* This is a very telling statement, with which we agree. How many new dwellings will be needed in future has everything to do with projected population changes and household formation rates, and nothing to do with how many dwellings there are already.

Paragraph 22: *"The Government also proposes to introduce an affordability adjustment that takes into account changes over time, in addition to the existing approach of considering absolute affordability. This will increase the overall emphasis on affordability in the formula and ensure that the revised standard method is more responsive to changing local circumstances, so that homes are planned for where they are least affordable. For example, where affordability improves, this will be reflected by lower need for housing being identified. The Government also proposes to remove the cap which artificially suppresses the level of housing identified."* There is a heroic assumption in this paragraph that building more dwellings will lower prices. Our experience here in Durham is that land has been released and many hundreds of houses have been built but nearly all are in the so-called 'Executive Housing' bracket and are totally unaffordable to people on modest incomes. Durham University, Durham County Council and the University Hospital of North Durham are major employers in Durham City but their junior staff have no hope of being able to afford to buy a house in the city and have to commute from the villages beyond. Indeed, the Independent Inspector who has completed his examination of the County Durham Plan considers in his Final Report of 17 September 2020 the matter he had posed of whether increasing the quantity of land for housing development beyond the agreed Local Housing Need figure could be justified in order to help meet the annual rate of affordable housing predicted as needed. He concludes that the County Council is right to not do so, for several reasons including that market demand would not take up the additional allocations and so would fail to deliver the additional affordable houses. We contend that inflating the estimated need beyond projected population and household numbers would simply enable house-builders to pick off the easiest and most profitable sites and leave many communities with empty sites.

The questions

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?*

No, we do not agree. The Government is frustrated that its national target of 300,000 new dwellings per year has not been achieved, and that up-to-date policy-free national household projections have not come up with the 'right' answer. The DHCLG's prevailing solution is to pick an older, higher household projection. This 'Changes to the Current Planning System' document and its companion 'Planning for the Future document, propose an ingenious formula. The starting point is the remarkably crude annual requirement that the annual build rate should be 0.5% of current housing stock. There is absolutely no basis for 0.5% as opposed to any other percentage. It has been chosen simply because it produces the national quantum of at least 300,000 new dwellings per year.

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.

See answer to Q1 above.

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, we do not agree. Using the workplace based median house price to median earnings ratio is wrong for at least two reasons:

1. Taking a "workplace" earnings figure and comparing it to a house price assumes that everyone who works in a particular Local Authority area actually lives there. Local Authority areas are not 'Travel-to-Work' areas. A significant proportion of the population commutes into cities and benefits from the higher level of earnings.

*2. When applying for a mortgage, the **total** household income is taken into account. Applying just an earnings figure as part of the affordability ratio implies that this is planning for a future where each house is only occupied by one person. Clearly that is a nonsense. Median household income would give a far more complete evidence base than individual earnings.*

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.

See answer to Q3 above.

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

See answer to Q3 above.

Q6 and Q7: 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?

This may be a challenging timescale for some Planning Authorities but generally seems reasonable to us.

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?

This may be a challenging timescale for some Planning Authorities but generally seems reasonable to us

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)**

Any initiatives aimed at increasing the delivery of affordable homes is to be applauded, including the First Homes initiative. However, where land values are high, developers frequently seek to change the terms of a planning permission, claiming that it is not viable for them to provide affordable homes at all. Further, developers should deliver all affordable homes onsite, unless there are truly exceptional circumstances.

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

Affordable home ownership is surely not 'for build to rent'. Exemptions do not make sense. If mixed developments are to succeed, then it must follow that all developments should have a proportion of affordable dwellings for sale and dwellings for rent both in the private sector with a private landlord and in the public sector with a significant proportion for subsidised rents.

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

The only sensible exemption would be small estates of ten or less dwellings. However, developers may attempt to split large developments into smaller ones, but appropriate legal covenants should prevent this.

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

No.

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

Generally yes.

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

Discounted dwellings should remain as discounted dwellings and so provide a long-term facility for those dependent on subsidised housing.

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?

The tremendous effort put into Local and Neighbourhood Plans must not be undermined by the principle of 'Exception Sites' for whatever reason.

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

No.

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

City of Durham Parish Council considers that it is not appropriate for it to comment on rural areas.

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

We support the principle of assisting small building firms, and this proposal may help.

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

i) Up to 40 homes

ii) Up to 50 homes

iii) Other (please specify)

A threshold of 40 homes would be our upper limit as most potential development sites within the urban framework of Durham City are likely to be under that size and we do need affordable and first homes. The time limit is essential.

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

Yes.

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

Yes.

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

Yes.

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

City of Durham Parish Council considers that it is not appropriate for it to comment on rural areas.

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

The Government should free up some government-owned land and enable the delivery of quality homes for rent, where families need them, close to services. These could be delivered by smaller companies, who cannot compete in the current speculative trading of building land in many areas.

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

Yes, given that what is proposed is in terms a stripped down application for outline planning permission. The converse of requiring very limited information is that the Local Planning Authority may very well decline to give a Permission in Principle because the site and its location may raise issues that cannot be glossed over.

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.

No need to set a limit as the Permission in Principle route requires that housing must occupy the majority of the overall scheme and that non-housing development should be compatible with the proposed residential development.

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?

Yes, we agree.

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

Yes. The height of any buildings above three storeys should be stated so that high buildings can be accepted or refused appropriately.

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.

We support option (iii).

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

The proposed fee structure sets lower fees, as an incentive to developers to come forward with schemes. Account of the impact on Local Authority staffing levels will need to be taken.

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

No comment.

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.

Yes.

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.

There is already a Guidance Permission in Principle, published 28 July 2017 and last updated 15 March 2019 and it is felt that this is, at the present time, sufficient for purpose.

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

The benefit would be greater certainty for developers to investigate possible housing development sites, which should lead to more houses being built. The downside could

be less public involvement and more work pressures for Local Planning Authorities. So much more than the bare minimum notice is needed for the public and other potentially affected parties and setting the fee structure such that it actually does meet the additional costs to the Authority.

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

We cannot offer a reasoned answer.

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?

No comment.
