

## White Paper Consultation Questions – New Forest National Park Authority response

| Number | Question   | New Forest National Park Authority Response   |
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| 1      | What three words do you associate most with the planning system in England?  |   |
| 2(a)   | Do you get involved with planning decisions in your local area? [Yes/No]   | Yes - the New Forest National Park Authority is the sole statutory planning authority for the 220 square miles of the designated National Park. We deal with around 900 planning applications per annum and are also responsible for Local Plan-making and planning enforcement as well as supporting communities who wish to develop a neighbourhood plan.   |
| 2(b)   | If no, why not? [Don't know how to/ It takes too long/ It's too complicated/ I don't care / Other –please specify]   | Not applicable.   |
| 3      | Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future? [Social media/ Online news/ Newspaper/ By Post/ Other – please specify] | <p>Weekly lists of planning applications and decisions are already set out clearly on the Authority's website. Plans, application forms and supporting documents can all be viewed on-line and representations can also be submitted online. A growing number of applications are submitted via the online Planning Portal – which had its busiest month this summer for new applications being submitted.</p> <p>The National Park Authority already publicises each stage of the Local Plan-making process via social media and online via our website, and by e-newsletter. We regularly receive email notification of planning applications and draft Local Plan documents from adjacent authorities. Anything that improves these lines of communication will be</p> |

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|   |  | welcomed. Our own Local Plan itself is in an online machine readable format.  |
| 4 | What are your top three priorities for planning in your local area? [Building homes for young people/ building homes for the homeless/ Protection of green spaces/ The environment, biodiversity and action on climate change/ increasing the affordability of housing/ The design of new homes and places / Supporting the high street/ Supporting the local economy/ More or better local infrastructure/ Protection of existing heritage buildings or areas/ Other – please specify | <ul style="list-style-type: none"> <li>• Conserving and enhancing the landscape of the New Forest National Park.</li> <li>• Reinforcing the local distinctiveness of the built and natural environment of the National Park.</li> <li>• Ensuring new development addresses local needs arising from within the 35,000 residents of the National Park as far as possible.</li> </ul>   |
| 5 | Do you agree that Local Plans should be simplified in line with our proposals? [Yes/ No/ Not sure. Please provide supporting statement.]   | <p>We recognise that Local Plans can take too long to produce. However, our own recent Local Plan review (which concluded in 2019) was completed within less than 4 years and this included 14 months of independent Examination. From our experience, reforms to the Plan-making process will need to include additional resources for the Planning Inspectorate.</p> <p>Linked to the proposed simplification of Local Plans (through development management policies being established at a national level; housing requirements being set nationally; and less public consultation at the Plan-making stage), we are concerned that the White Paper proposals will disenfranchise local communities and could lead to rising complaints on a case by case basis</p> |
| 6 | Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies  | No - the proposals go too far in taking out all local development management policies for 'Protected' areas from Local Plans. We are very concerned that general  |

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|  | <p>nationally? [Yes/ No/ Not sure. Please provide supporting statement]</p> | <p>development management policies set out in a revised NPPF will not be sufficiently nuanced and detailed for this to work in practice, given the range of local planning issues to be addressed in National Parks. We would also query why this is considered necessary – the New Forest National Park for example, is covered by an up-to-date Local Plan with locally specific policies addressing matters like impacts of development on the New Forest’s protected habitats, local distinctiveness, tranquillity and landscape character. The NPPF does not currently form part of the statutory ‘development plan’ but is instead a material planning consideration. The proposals in the White Paper would require a fundamental change to primary legislation to elevate the legal status of the NPPF or its successor.</p> <p>As an alternative, our view is that the reformed planning system should continue to offer scope for new local policy to be included within Local Plans, provided that policy does not duplicate policy in the NPPF. This approach is referenced in the ‘alternatives’ discussed on page 30 of the White Paper. This alternative approach is similar to the current system, where the Planning Inspectorate at Examination has the ability to delete local planning policies that duplicate national planning policy.</p> <p>In any reforms to national planning policy we consider it essential that paragraph 172 and the major development test set out in the current NPPF (2019) remain. The reforms to the planning system also provide the opportunity to implement the recommendations of the Landscapes Review: Final Report (2019), which recommended that national planning policy and guidance, “...<i>should make</i></p> |
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|      |  | <i>clearer that developments proposed in the areas buffering national landscapes' boundaries must avoid detrimental impacts on them..." – page 63.</i>  |
| 7(a) | Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of "sustainable development", which would include consideration of environmental impact? (Yes/ No/ Not sure. Please provide supporting statement.) | Not sure - the proposal to replace sustainability appraisal with a less complicated 'sustainable development test of the local plan' has some merit. However, the term 'sustainable development' is open to multiple interpretations and must be carefully defined in any reforms to the planning system, either through new primary legislation or a revised NPPF. Strategic planning is critical for the delivery of sustainable development.   |
| 7(b) | How could strategic, cross-boundary issues could be best planned for in the absence of a formal Duty to Cooperate?   | <p>The abolition of the legal 'duty to cooperate' is a retrograde step and not supported by evidence to justify its abolition. Although not perfect, the existing 'duty to cooperate' is legally tested at Examination and in the New Forest has helped to facilitate joint work on strategic development sites (e.g. the former Fawley Power Station site); the distribution of required housing; and cross-boundary habitat mitigation measures (e.g. the Bird Aware Solent scheme).</p> <p>It is vitally important that there is a statutory mechanism that is wider than local to ensure effective liaison and co-operation on cross-boundary, strategic planning matter and to support the Section 62 'duty of regard' towards the two National Park purposes. Bringing back a higher tier of policy making, either through regional, sub-regional or county level plans, would help make local plan preparation quicker, more efficient and aid integrated sustainable development.</p> |

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| 8(a) | <p>Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes/ No/ No sure. Please provide supporting statement]</p> | <p>No - it is difficult to see how a national, centralised system of generating binding housing requirements for local authorities will have sufficient finesse. Such an approach is unlikely to marshal the knowledge and information required to fully assess the constraints and opportunities for growth (and restraint) in a local area. The proposed approach is likely to increase development pressures in and around National Parks – especially in areas like the New Forest where affordability is an important issue.</p> <p>The White Paper is unclear on whether National Park Authorities (as local <u>planning</u> authorities, but not local authorities) will be given binding housing requirements for their areas under the White Paper’s proposals. As such the imposition of binding housing requirements from above for National Parks is strongly objected to and would be contrary to the National Parks Circular (2010), which is cross-referenced in both the current NPPF and NPPG resource - and ultimately conflicts with the statutory National Park purposes.</p> <p>As an alternative, National Park Authorities should be able to continue to calculate their housing need figures based on the best available evidence (as per the current NPPG section on ‘Housing and economic needs assessment’); and to plan for small-scale development to meet identified local needs arising from within their local communities, without the need to need to meet a nationally-generated binding annual housing requirement. In our situation this provides sustainable levels of development in a context of multiple constraints.</p> |
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| 8(b) | <p>Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No/ Not sure. Please provide supporting statement.]</p>              | <p>No - we consider both indicators to be overly simplistic. The level of affordability is a particularly blunt tool for calculating new housing needs - increasing the scale of development in the least affordable areas does not resolve affordability.</p> <p>The approach of using the extent of existing urban areas as an indicator for the quantity of new development would simply perpetuate existing patterns of development – leading to the overheating of some parts of the country and a lack of investment in others. In our context, the New Forest District (prior to National Park designation in 2005) saw high levels of development in the 1980s, with over 1,000 dwellings built per annum in a semi-rural district. This means the district (which now includes the National Park) has a housing stock of over 75,000 dwellings which, under the White Paper proposals, would result in it having to accommodate more development.</p> |
| 9(a) | <p>Do you agree that there should be automatic outline permission for areas for substantial development (<i>Growth</i> areas) with faster routes for detailed consent? [Yes/ No/Not sure. Please provide supporting statement.]</p> | <p>No - the overall proposal to classifying all land under three designations appears to be an oversimplification which would be too blunt a tool for the sensitive and detailed planning required in and adjacent to a National Park. There could be a scenario where a 'Growth' area is designated immediately adjacent to a National Park and substantial development would get automatic outline permission under the proposals in the White Paper. This does not reflect the statutory 'duty of regard' to the two National Park purposes set out in Section 62 (2) of the Environment Act 1995. It is also unclear how such a tool would be used with more granularity to create a mosaic of 'growth-renewal-protected' zones in a given area. If this were to be the outcome of the</p>   |

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|      |   | reformed system then it would look somewhat similar to the existing approach and begs the question why do it.   |
| 9(b) | Do you agree with our proposals above for the consent arrangements for <i>Renewal</i> and <i>Protected</i> areas? [Yes/ No/ Not sure. Please provide supporting statement.] | <p>No - the proposed categorisation of land within three categories is too blunt to reflect the spatial approach required in good planning. For example, in National Parks there will be opportunities for small-scale development that may not be reflected in a blanket 'Protected' area designation.</p> <p>If the Government pursues the approach to categorising land within the three proposed designations, our view is that National Parks fit most closely with the 'Protected' designation. This would reflect the protection afforded to National Parks through existing primary legislation and existing national planning policy set out in paragraph 172 and footnote 6 of the NPPF (2019). The alternative approach of sub-dividing National Parks to include 'Growth' or 'Renewal' designations would open them up to extended Permitted Development rights and weaken their protected status in primary legislation.</p> <p>As set out in our response to question 8(a), within the National Park-wide designation of 'Protected' the planning system should enable appropriate, small-scale proposals to come forward to meet local needs (in accordance with our socio-economic duty).</p> <p>In addition, for 'Protected' areas to be genuinely protected we consider national Permitted Development rights should be removed and certainly in National Parks. The reforms to the planning system provide an opportunity to address</p> |

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|      |  | some of the current anomalies in the system and to meet the recommendations of the Government's own national Landscapes Review (2019).   |
| 9(c) | Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes/ No/ Not sure. Please provide supporting statement.] | Yes - the NSIP regime is well understood, fair and efficient and is geared up to determine such complex applications.  |
| 10.  | Do you agree with our proposals to make decision-making faster and more certain? [Yes/ No/Not sure. Please provide supporting statement.]  | <p>No - we welcome the Government's intention to develop a comprehensive resources and skills strategy to support the implementation of the reforms. However, this section of the White Paper is overly weighted toward the interests of developers and landowners and appears to underplay the needs of LPAs or the communities they serve.</p> <p>The proposal to consolidate existing routes to permission and introduce further national Permitted Development rights is of great concern to the National Park Authority and our local parish councils. Further extended Permitted Development rights would seriously undermine the protection afforded to National Parks, and facilitate more development in protected landscapes over which local communities will have no say. It would also run counter to the recommendation in the Government-commissioned 'Landscapes Review: Final Report' (September 2019) that, <i>"The current Permitted Development Rights (PDR) system should also be reviewed and, if necessary, further PDRs should be added to the list of those currently withdrawn within national landscapes to ensure that the full application process applies before determining planning approval."</i></p> |



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|    |  | <p>National Park Authorities are the only planning authorities in England that have formal representation of town and parish councillors on our full Authority and planning committees. Parish Councils in the New Forest are particularly concerned about what the reforms mean for their involvement in the planning process. The Parish Councils in the National Park view the White Paper proposals as a 'centralisation' of the planning system that will by-pass input from communities.</p>   |
| 11 | <p>Do you agree with our proposals for accessible, web-based Local Plans? [Yes/ No/ Not sure. Please provide supporting statement.]</p>                                | <p>Not sure – we are concerned that the move towards digital, map-based Local Plans could be problematic in rural areas (due to broadband coverage); and areas where a higher percentage of the population cannot access digital technology. This means in some areas of the country large parts of the community would not be able to engage. On a positive note, the move to more visual map-based Plans provides an opportunity for habitat connectivity and nature recovery to be more embedded in Local Plans.</p>  |
| 12 | <p>Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes/ No/ Not sure. Please provide supporting statement.]</p> | <p>No – we do not consider this to be a realistic time frame. The White Paper proposals place a greater emphasis on the Plan-making process. If sites allocated for development in 'Growth' areas are to have automatic permission in principle (as envisaged in the White Paper), it will require more work and evidence gathering at the Plan-making stage to ensure deliverability and other elements to ensure developments are sustainable. This will inevitably lengthen the process and make the proposed 30-month timescale extremely challenging.</p> |

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|        |   | <p>From our experience, evidence gathering is an essential stage to ensure the Local Plan will contribute to the achievement of sustainable development, and be a plan for the assessed local needs of the community. The proposed 'stage 2' 12 months seems a particularly tight timescale to draw up the Local Plan. We are particularly concerned about the impact of a simplified environmental assessment process and what this would mean for the New Forest National Park, which has a higher proportion of its land covered by international nature conservation designations than any other planning area in England. Habitats Regulation Assessments (HRAs) – which ensure adverse impacts on the integrity of internationally protected sites from new development do not occur – are not referenced within the White Paper. Planning reforms should retain the established legal precautionary principle in protecting the New Forest's most important habitats.</p> <p>As an overarching comment, the proposed system does not appear to allow people to engage meaningfully with the process. The proposed consultation on the draft Local Plan (taking place simultaneously with submission for examination) will invariably be too late in the process for local communities to be able to influence the content. Providing local communities, Parish Councils and other consultees with a single 6-week period to make representations on the draft Local Plan undervalues the contribution they make.</p> |
| 13 (a) | Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes/ No/ Not sure. Please provide supporting statement.] | Yes – Neighbourhood Plans can add value and should not be reduced to simply delivering more housing site allocations. Questions of resources, support and targeting   |

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|        |  | of effort (by topic and by stage in the planning system overall) should form the mainstay of any changes.   |
| 13 (b) | How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?                           | <p>Neighbourhood Plans should not be reduced to simply performing the role of design guides and codes – they should continue to enable local communities to genuinely plan for the future of their areas across a range of planning matters, not just housing delivery. There is already a lot of publicly available data that communities can tap into to understand their local area. By using digital tools to make this data more visually interesting it can help to engage with the wider community and facilitate community dialogue to better understand the key issues in their area. This can include 3D visualisation of potential schemes, or showing a variety of options for a particular site in 3D.</p> <p>There is a platform called Commonplace that already facilitates digital community engagement, and is used by Planning Authorities, developers and communities. We feel that questions of resources, support and targeting of effort (by topic and by stage in the planning system overall) should form the mainstay of any changes to neighbourhood planning. This could usefully supplement existing proposals in the White Paper relating to community engagement.</p> |
| 14     | Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support? [Yes/ No/ Not sure. Please provide supporting statement.] | Yes - planning permission should not facilitate speculative housing development and land banking; but should instead serve to meet identified needs and lead to permissions being built-out in a timely manner. There are a number of ways to incentivise build-out of consented schemes – including increasing the fee for the renewal of planning permissions; requiring commencement within a shorter  |

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|    |   | period than the current 3 years standard condition; taxing sites with planning permission that have not commenced; or requiring any material commencement made on site to be substantial and sustained.  |
| 15 | What do you think about design of new development that has happened recently in your area? (Not sure or indifferent / Beautiful and/ or well-designed/ Ugly and/ or poorly-designed/ There hasn't been any/ Other – please specify] | Generally, the new development that has taken place in the past 15 years is of high quality and helps enhance the National Park. We run an annual building design awards competition and have also worked with local communities on the production and adoption of Village Design Statements. However there have been a small number of developments undertaken under the Permitted Development rights regime that have been poorly designed.  |
| 16 | Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars/ More green and open spaces/ Energy efficiency of new buildings/ More trees/ Other – please specify] | Achieving sustainable development is a key corporate priority for our National Park. We need a proper definition of sustainability that can aid decision making, where environmental, social and economic needs are met. The White Paper is disappointingly almost silent on other related Government agendas, such as delivering biodiversity net gain.   |
| 17 | Do you agree with our proposals for improving the production and use of design guides and codes? [Yes/ No/ Not sure. Please provide supporting statement.]  | Not sure – we generally support the emphasis on design quality within the White Paper. However, we are concerned that the extended Permitted Development rights and 'Pattern Book' approach to design in the White Paper could lead to mediocre development or stifle innovative designs. The production of Design Codes could result in the building of identikit houses - rather than reinforcing local vernacular and local distinctiveness, it risks replacing it with uniform development typologies. The pattern book approach already used by the larger house builders creates the |

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|    |   | <p>danger of every built environment replicating every other built environment, which is contrary to the need to reflect a 'sense of place' and enhance local distinctiveness.</p> <p>It is unclear as to whether the National Design Code will seek to reflect local, vernacular character and design, or whether this will be left to local design codes and guides, and what level of detail the latter will include.</p>   |
| 18 | <p>Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making? [Yes/ No/ Not sure. Please provide supporting statement.]</p> | <p>Yes - but it is unclear how this will be resourced. Overall we support the proposal for a new national design body to encourage and support design. If the idea of accreditation for agents/designers was pursued this body should lead so that the expected standard of work is consistent.</p> <p>Notably the history of lead bodies on design matters has been rather fraught, with the Royal Fine Art Commission being replaced by CABI and then by the Design Council. There is a need to draw on the past experience to ensure any new body set up to champion design does not repeat the mistakes of the past and has real clout, as well as championing local design.</p> |
| 19 | <p>Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes/ No/ Not sure. Please provide supporting statement.]</p>   | <p>Yes – we support the emphasis on design quality and the importance of leading from the front on this matter.</p>  |
| 20 | <p>Do you agree with our proposals for implementing a fast-track for beauty? [Yes/ No/ Not sure. Please provide supporting statement.]</p>  | <p>No – we disagree with the principle of legislating to widen and change the nature of Permitted Development to enable replicable forms of development to be approved easily and quickly. We consider this approach to be at odds with</p>  |

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|       |  | <p>National Park purposes and duty. The 'pattern book' approach used by the large construction firms would be completely at odds with National Park purposes and we strongly suggest that National Parks are excluded from this. Moreover the question of 'beauty' is only one (and subjective) criterion against which sustainable development should be judged.</p> <p>We are also concerned at whether suitably experienced architectural specialists can have earned autonomy from routine listed building consent. Officers have experience of private "conservation accredited" professionals acting as agent for an application and where the application was contrary to local conservation and heritage policies and general best practice conservation understanding, because they are guided by the client brief. There are multiple design and conservation bodies, which take slightly different approaches and have different ethos (IHBC, SPAB, the Design Council) so how would accreditation create a work standard and how would it be regulated?</p> |
| 21    | When new development happens in your area, what is your priority for what comes with it? [More affordable housing/ More or better infrastructure (such as transport, schools, health provision)/ Design of new buildings/ More shops and/or employment space/ Green space/ Don't know/ other – please specify) | In line with the statutory framework for National Parks, our priority is to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park and promote opportunities to enjoy its special qualities. In doing so, we also have a socio-economic duty towards our local communities and a key part of this is ensuring a supply of genuinely affordable homes for local people.  |
| 22(a) | Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is   | We do not currently operate CIL and the proposed abolition of Section 106 agreements is not supported. These agreements currently enable on-site measures to be   |

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|       | charged as a fixed proportion of development value above a set threshold?   | <p>secured and other mitigation measures that cannot be secured through an infrastructure levy (e.g. the Bird Aware Solent contributions). The proposed move to a national Infrastructure Levy would potentially hinder the delivery of measures linked to new development that do not easily fit within the definition of 'infrastructure'.</p> <p>Not all Section 106 agreements relate to financial matters (for example, agricultural occupancy conditions and affordable housing are secured through legal agreements) and therefore could not be replaced by an Infrastructure Levy. We are very concerned that the Infrastructure Levy will remove the ability to secure other development impact mitigation (such as that currently sought towards the protected habitats of the New Forest) which the Levy will not cover and which cannot be adequately dealt with by planning conditions. It is also unclear how the proposed abolition of Section 106 agreements in the Planning White Paper fits with the proposals for new conservation covenants referenced in the Environment Bill.</p> <p>Finally, development value varies considerably across the country. This means the proportionately lower levy in lower value areas may not support much needed infrastructure.</p> |
| 22(b) | Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate/ Nationally at an area-specific rate/ Locally] | Rates should be set locally or regionally to take into account local land values and in order to try and help address the imbalance in growth and economic development across regions.   |
| 22(c) | Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support   | The Infrastructure Levy should aim to capture at least the same amount of value overall as current models. The   |

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|       | greater investment in infrastructure, affordable housing and local communities? [Same amount overall/ More value/ Less value/ Not sure. Please provide supporting statement.]  | current approach to development viability has been loaded in favour of developers to the detriment of local communities in the past 8 years. If Section 106 agreements are not retained we would suggest the new Infrastructure Levy would have to absorb combined payments from both the previous CIL and Section 106 agreements.  |
| 22(d) | Should we allow local authorities to borrow against the Infrastructure levy, to support infrastructure delivery in their area? [Yes/ No/ Not sure. Please provide supporting statement.]   | Not sure - there would be uncertainty as to how much money a local authority would receive, since the proposal suggests making the payment dependent on the actual value of the property, which would be determined after the development is completed. Should there be a sudden, unexpected downturn in the housing market, the local authority could receive considerably less than expected or even no payment at all. Overall the proposals in this regard appear to shift the balance of risk on to Local Authorities. |
| 23    | Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes/ No/ Not sure. Please provide supporting statement.]  | Yes - as such changes of use may involve significant floorspace and residential use, significant demand on local infrastructure is likely to result. In addition, the White Paper signals a further extension of Permitted Development rights and so it is important these developments are captured.   |
| 24(a) | Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes/ No/ Not sure. Please provide supporting statement.] | Yes – the reforms to the planning system should aim to secure at least the same level of affordable housing, as the levels of affordable housing provided are already well below the levels of need and should not be reduced further. Indeed in the New Forest there is a strong case to bolster further the ability of planning authorities to increase levels of affordable housing.   |



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| 24(b) | Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes/ No/ No sure. Please provide supporting statement.] | It is questioned how either of these options would secure the delivery of affordable housing in perpetuity as a current Section 106 agreement does  |
| 24(c) | If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes/ No/ Not sure. Please provide supporting statement.]   | We do not support the in-kind delivery approach as it cannot adequately reflect and take account of the differentiated circumstances for individual sites.  |
| 24(d) | If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes/ No/Not sure. Please provide supporting statement.]                         | We do not support the in-kind delivery approach as it cannot adequately reflect and take account of the differentiated circumstances for individual sites.  |
| 25    | Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes/ No/ Not sure. Please provide supporting statement.]  | Not sure – we have a concern that the White Paper says the Infrastructure Levy could be used to 'improve services or reduce council tax'. There is a danger the levy will not be spent on delivering local infrastructure but supporting general Council budgets. There is a case for providing clearer guidance and a framework for what local authorities can spend the Levy on to ensure it is tied to the impacts of new development and not just seen as an income stream. |
| 25(b) | If yes, should an affordable housing 'ring-fence' be developed? [Yes/ No/ Not sure. Please provide supporting statement.]  | Yes – given the significant need for affordable housing, there is merit in ring fencing funding to support its delivery. As outlined above, there is a risk that Infrastructure Fund receipts could be used to generally improve services, rather than support the provision of local infrastructure.   |
| 26    | Do you have any views on the potential impact of the proposals raised in this consultation on people with  | Ensuring that there remains a variety of ways for people to engage with the planning process, not just via digital  |

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|  | protected characteristics as defined in section 149 of the Equality Act 2010? | means, but facilitating engagement with those who have visual or hearing impairments, or whose first language is not English. |
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