



VE/VJ Anniversary Update and Plan for Remembrance and Armistice Day (8 and 11 November 2020)

General

Members will already be aware of Anniversary Commemorations and Remembrance for VE Day (8 May 20), Armed Forces Flag Raising Day (27 Jun 20) and VJ Day (15 Aug 20). Since then we have also attended reflection on the 80th Anniversary of the Battle of Britain

Battle of Britain – 80th Anniversary

A very small but poignant service with a two minute silence and wreath laying took place at the Petersfield War Memorial at 10.45 am – 11.00 am on 15 September 2020 in commemoration of the 80th Anniversary of the Battle of Britain.

“The Battle of Britain was fought in the air from July 1940 to September 1940. It was on Sunday, 15 September 1940, 80 years ago that enemy aircraft launched the largest and most concentrated aerial attack against London in the hope of drawing out the RAF into a battle of annihilation. Around 1,500 aircraft took part in the air battles which lasted until dusk. The action was the climax of the Battle of Britain.

The Service was conducted by the Rev Cannon Will Hughes and the Wreath Layers were David Lloyd of the Royal Air Force Association (RAFA) and on behalf of the Community by Town Mayor Councillor Mrs Lesley Farrow with the inscription:-

“Do not despair for Johnny-head-in-air. He sleeps as sound Johnny underground.

Fetch out no shroud for Johnny-in-the-cloud. And keep your tears for him in after years.

Better by far for Johnny-the-bright-star, to keep your head and see his children fed.”

(“For Johnny” by John Pudney: 1909-1977)

We the Many will Remember the Few for So Much”

Plan for Remembrance and Armistice Day

It is thought that the best way to inform members of plans for Remembrance Sunday is best served by our Press Release drafted for use between now and the 8 Nov 20. Armistice Day will be as for other years held on 11 Nov 20 with a short Remembrance Service conducted at the War Memorial. Our Press Release follows:-

"It is with considerable sadness and deep regret that Petersfield Town Council in consultation with The Church and the Petersfield Branch of the Royal British Legion has concluded that our Town's signature event of recognising and remembering the Fallen and all Sacrifices has had to be most severely curtailed for 8 November 2020. We can no longer hope for the best as arrangements take some planning and rehearsal which currently cannot be undertaken and cannot be re- introduced at short notice. It follows, therefore, that there will be no parades and marching bands with contingents.

Current arrangements and again always subject to change at the very last minute depending upon circumstances is for the minimum number of persons who will attend the War Memorial on Sunday 8 November 2020 and observe an Act of Remembrance and Silence on behalf of the Community. Names of our Fallen will be read. This will be filmed and portrayed in our 'Petersfield Remembers' film footage we have been gathering during this year of many Anniversaries. All key organisers have been informed of the situation. The Remembrance Garden installed at the War Memorial will be available for individual Poppy Crosses. Local Organisation Wreath Layers are being contacted for alternative arrangements and options. Appropriate road closures will be in place for this Service.

We are certain all will very much understand the position we are all in and would not only ask but implore that folk do not gather or converge in the High Street and immediate area. Unplanned crowding or lack of social distancing may cause the Service to be halted immediately which is something none of us would wish for. We do hope that 2021 will see us back in good heart for this annual and very well attended event."

<Ends>



Draft Consultation Responses

- 1. Changes to the current planning system**
- 2. Planning for the future White Paper**
- 3. Transparency & Competition (land control)**

The Planning Committee met on Tuesday 15th September to discuss the Council's response to these three consultation papers. The committee agreed that the Chairman contact me to formulate a response broadly based on the comments from Cllr Deane that had been circulated to councillors previously. Having discussed this with Cllr Deane in the interim period, we agreed that I would use his comments as a base but seek to add additional pertinent points where appropriate to respond to the wide variety and number of questions asked in the consultation and that the documents circulated by the National Association of Local Councils (NALC) outlining their indicative responses be used in this connection.

Responses to these consultations are required by 1st, 29th and 30th October respectively.

1. PC10-20 | CHANGES TO THE CURRENT PLANNING SYSTEM

Summary

The Ministry of Housing, Communities and Local Government has issued a new consultation on changes to the planning system. This consultation seeks views on a range of proposed changes to the current planning system including: changes to the standard method for assessing local housing need, securing of First Homes through developer contributions, temporarily lifting the small sites threshold and extending the current Permission in Principle to major development. The main consultation document can be found [here](#).

Consultation questions

1. 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?

2. 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

3. 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.

4. 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.

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

6. 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?

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

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

8. 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)

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

9. 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?

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

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

12. Do you agree with the proposed approach to transitional arrangements set out above?

13. Do you agree with the proposed approach to different levels of discount?

14. 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?

If sites are not considered viable by developers they will not be built so there has to be a means of ensuring site viability and this seems to be a suitable approach

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

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

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

On balance this seems reasonable although it is likely that not just SME builders will seek to benefit from it

18. What is the appropriate level of small sites threshold? i) Up to 40 homes ii) Up to 50 homes iii) Other (please specify)

Up to 40 homes would be preferred.

19. Do you agree with the proposed approach to the site size threshold?

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

On balance this seems reasonable.

21. Do you agree with the proposed approach to minimising threshold effects?

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

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

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

Members consider that most major developments would require a habitat assessment and granting Permission in Principle without an assessment being done would be unwise.

25. 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.

26. 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?

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

28. 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

Both would be preferred – particularly a requirement to publicise through social media

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

30. What level of flat fee do you consider appropriate, and why?

31. 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

32. 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.

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

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

35. 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?

2. PC11-20 | WHITE PAPER: PLANNING FOR THE FUTURE

Summary

The Ministry of Housing, Communities and Local Government has issued a new consultation on planning for the future. This consultation seeks any views on each part of a package of proposals for reform of the planning system in England to streamline and modernise the planning process, improve outcomes on design and sustainability, reform developer contributions and ensure more land is available for development where it is needed. The main consultation document can be found [here](#).

Consultation questions

NALC will be responding to the consultation questions as follows:

1. What three words do you associate most with the planning system in England?
2. Do you get involved with planning decisions in your local area? [Yes / No]

(a). If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]
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]

As at present by email from the local planning authority

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]
5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]
6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement.]

No. Neighbourhood Plans allow for the local community to support significant policies to apply locally to meet locally identified needs and this needs to be protected in order to ensure that local distinctiveness is protected along with the 'sense of place'

7. 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.]

(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

8. (a) Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]

Not sure. It is unclear whether such a system would be appropriate and work throughout the entire country whilst still respecting land constraints which would be an essential element in determining housing numbers – especially in National Parks

(b). 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.]

9. (a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement.]

No. Experience tells us that land which was once considered suitable for development is now suffering significant adverse impacts as a result of climate change and unusual weather patterns so the assessment of suitability of land for development can and does change and this would not be reflected by automatic permission being granted.

(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]

No. The NPPF policies should be a significant element in assessing the suitability of a planning application but Neighbourhood Plans and other local policies should also be reflected as being necessary as part of this assessment.

(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.]

10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]

Not sure. In principle the proposals you make seem sensible and would assist in reducing the time taken to assess planning applications however, local people also wish to be involved in this process, as now, and a reduction in the time available for them to be involved and comment on the proposals would not be welcomed.

11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

In principle yes – but it does prevent those unable to use or access the internet either from personal ability or poor local infrastructure/broadband speeds from being involved or having access to the system which is potentially discriminatory.

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.]

Not sure. It is not unusual for the production of Local Plans to be delayed for reasons outside the control of the local authority, including legal challenges.

12. (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 involve significant local input into how the community wishes their area to be shaped as well as being subject to a local referendum to support the Plan and as such, this extension to local democracy should be retained and encouraged.

(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?

13. 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. It currently takes a long time for some developers to proceed from obtaining permissions to starting development – never mind how many years it takes for that development site to then be completed.

14. What do you think about the 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]

Broadly satisfactory although it remains a struggle to persuade nationally based developers to produce designs that reflect local policies and distinctiveness.

15. 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]

All of the above

16. 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.]

Broadly, yes. It is important for local design and distinctiveness to be recognised by developers which is not always the case currently. It will also be important for proposed national design codes to be consulted on first otherwise it is difficult to comment more positively. It may also be a positive move to make it a legal requirement for the design codes to be applied including local design codes where included within local planning policies and documents such as a Neighbourhood Plan.

17. 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.]

In principle, yes.

18. 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.]

Subject to the comments to question 16, yes

20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

Not sure. Beauty can be very subjective

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]

Improved infrastructure to support the whole of the community – not just the new development; more affordable housing; integrating the new development into the existing community, more green spaces, design of build, environmental sustainability of development; enhancing the town as a great place to live, work and visit

22. (a) Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold? [Yes / No / Not sure. Please provide supporting statement.]

Nor sure. There are advantages and disadvantages of both options and it is not considered that there is sufficient knowledge to determine the option to be chosen.

- (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]

With the drive in recent years towards localisation, it is considered to be a backwards step to impose such a levy at a national single rate. There are concerns that it could exacerbate inequalities across the country too.

- (c) Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

More value. Local infrastructure is struggling to keep pace with developments in many places so enhanced sums are needed to satisfy this issue.

- (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.]

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.]

No. Permitted development is generally of a small scale or done by local authorities to provide or enhance existing infrastructure making it unsuitable for attracting the levy.

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. With the shortfall in low cost or affordable housing already in existence it is essential to at least match existing housing numbers, if not increase them although the viability of the sites has also got to be taken into consideration.

(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 / Not sure. Please provide supporting statement.]

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.]

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.]

25 Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

(a) If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

3. PC12-20 | TRANSPARENCY AND COMPETITION: DATA AND LAND CONTROL

Summary

The Ministry of Housing, Communities and Local Government has issued a call for evidence on data and land control. This call for evidence seeks views on proposals to require additional data from the beneficiaries of certain types of interests in land—rights of pre-emption, options and estate contracts. It also seeks views on the design of the policy and additional evidence on the impacts of the policy. The main document can be found [here](#).

Consultation questions

NALC will be responding to the consultation questions as follows:

1. The Public Interest

Do you think there is a public interest in collating and publishing additional data on contractual controls over land?

2. Rights of pre-emption and options

(a) Do you think that the definition of rights of pre-emption and land options in the Finance Act 2003, s. 4616 is a suitable basis for defining rights of pre-emption and options that will be subject to additional data requirements? Please give reasons.

(b) Is the exemption for options and rights of pre-emption for the purchase or lease of residential property for use as a domestic residence sufficient to cover: • options relating to the provision of occupational housing and • shared ownership schemes? Please give reasons.

(c) Are there any types of rights of pre-emption or options that do not fall under the scope of the definition in the Finance Act 2003, s. 46? Please give reasons

3. Estate contracts

Are the tests set out above sufficient to avoid inadvertently capturing transactions not related to the development of land? If not, please give examples.

4. Other contractual controls

(a) Are there any contractual arrangements by which control can be exercised over the purchase or sale of land, which should be included within this regime and which are not rights of pre-emption, options or estate contracts? Please give examples.

(b) If so, do you consider them (i) an interest in land (interests that are capable of being protected by way of a notice on the land register); or (ii) not an interest in land? Please give reasons.

5: Data requirements

(a) Are there any data fields that (i) should; or (ii) should not be subject to additional data requirements? Please give reasons.

(b) Are there any data fields that (i) should; or (ii) should not be placed on the land register? Please give reasons.

(c) Are there any data fields that (i) should; or (ii) should not be included in a contractual control interest dataset? Please give reasons.

(d) Are there other data fields that should be collected? Please give reasons.

(e) Do any of the data fields give rise to privacy risks? Please give reasons.

It would be helpful if such data were made available to local government bodies to assist in the creation of Neighbourhood Plans or other documents/policies where known ownership of land is required.

6. Contractual conditions

(a) Are there any data fields that (i) should; or (ii) should not be subject to additional data requirements? Please give reasons.

(b) Are there any data fields that (i) should; or (ii) should not be placed on the land register? Please give reasons.

(c) Are there any data fields that (i) should; or (ii) should not be included in a contractual control interest dataset? Please give reasons.

7. Legal Entity Identifiers

Should legal entities that are beneficiaries of contractual arrangements be asked to provide a Legal Entity Identifier? Please give reasons

8. Data currency

(a) Should beneficiaries be required to provide updated information on: • variation • termination, or • assignment or novation? Please give reasons.

(b) Are there other ways in which data currency could be maintained?

9. Accounting treatment

If your organisation is required to produce annual accounts, when are: (i) rights of preemption; (ii) options; and (iii) estate contracts recognised on the balance sheet? Please give reasons and state the accounting standard used.

10. Existing contractual control interests

(a) Should the requirement to supply additional data be limited to: (i) new contractual control interests only; or (ii) all extant interests? Please give reasons.

(b) How long should beneficiaries of an extant contractual control interests that is varied, assigned or novated be given to provide additional data before losing protection: (i) three months; or six months?

11. Current beneficiaries

What are the best ways of informing current beneficiaries of the need to provide additional data? Please give reasons.

12. A digital process?

Should the provision of additional data prior to the application process for an agreed notice be exclusively digital (with assisted digital support if required)? Please give reasons.

13. Certification

Should beneficiaries of contractual control interests with a duty to produce annual accounts be required to certify that all relevant interests have been noted? Please give reasons.

14. Restrictions

(a) Should beneficiaries of contractual control interests be required to obtain an agreed notice before they could apply for a restriction? Please give reasons.

(b) Should the protections of restrictions placed on an un-noted contractual control interest be (i) limited; or (ii) removed? Please give reasons.

c) If the Government accepts the Law Commission's recommendation on restrictions, should contractual control interest fall into the category of interest that cannot be capable of protection by way of a restriction? Please give reasons.

15. Alternative options

(a) Should a mandatory system be introduced whereby the beneficiary of a contractual control interest would, where it is possible to do so, be required to note their interest with HMLR? Please give reasons.

(b) If so, how should the system be enforced? Please give reasons.

16. Current practice

(a) If you are a beneficiary of a right of pre-emption, option or estate contract, please indicate how you protect your interest.

| | Notice | | Restriction | Other | Do not protect |
|----------------------|--------|------------|-------------|-------|----------------|
| | Agreed | Unilateral | | | |
| Right of pre-emption | | | | | |
| Option | | | | | |
| Estate contract | | | | | |

(b) What factors influence your choice? Please give reasons.

17. Data collation and provision

(a) Are there any data fields in Annex A that contracting parties would not have readily to hand? Please list them.

(b) What is your estimate of the time needed to provide the additional data?

(c) Does your entity hold a Legal Entity Identifier?

18. Data currency

What additional work (over and above the time and cost of preparing annual accounts) would your organisation need to undertake to identify contractual control interests that needed to be updated?

19. Certification

What additional work (over and above the time and cost of preparing annual accounts) would your organisation need to undertake to certify in your organisation's annual accounts that all relevant contractual control interests had been noted on the land register where the land is registered?

20. Economic impact

What impact, if any, do you think that these proposals will have on the English land market (residential and commercial)? Please describe the effects and provide evidence.

21. Costs

What impact, if any, do you think that these proposals will have on the costs incurred by participants in the English land market (residential and commercial)? Please describe the effects and provide evidence.

22. Identifying and understanding contractual control interests

(a) Can you estimate the amount of (i) time and (ii) money that you have spent on identifying land affected by a contractual control interest?

(b) What is the source of your information?

(c) Can you estimate the amount of (i) time and (ii) money that you have spent on seeking professional advice on exactly how a contractual control interest affects a piece of land?

23. Market impact

(a) If you are a small or medium enterprise (SME) builder or developer, do contractual controls hinder your ability to assess the viability of a local market? Please give reasons.

(b) If you are an SME builder or developer, does a lack of freely accessible and understandable data act as a barrier to you entering the market? Please give reasons.

24. Trust in the planning system

(a) Do you think that a lack of accessible and understandable data on contractual controls makes it more difficult for local communities to understand the likely pattern of development? Please give reasons.

(b) If so, to what extent does it undermine trust and confidence in the planning system: (i) not much; (ii) somewhat; (iii) a great deal? Please give reasons.

25. Public Sector Equality Duty

What impact, if any, do you think that these proposals will have on people who share protected characteristics²⁰? Please describe the effects and provide evidence.