Member Briefing

milton keynes council

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Member Briefing on Implications of Future of Planning White Paper and Changes to the Planning System Paper

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Executive summary

The Future of Planning White Paper proposes to overhaul the current discretionary based planning system with a rules-based approach, splitting local plans into three main areas of Growth, Renewal and Protected. The Government is consulted on this document in conjunction with the 'Changes to the current planning system' paper.

For Growth areas these are suitable for substantial development with outline planning permission is given automatically in the Local Plan. Renewal areas are appropriate for some development including infilling and densification of existing areas. Protected areas would include sites that justify more stringent development controls, including Green Belt and Conservation Areas.

The Plan Making process will be streamlined, with DM Policies proposed to be set nationally and the removal of the existing tests of soundness and the Duty to Co-operate. Centrally set housing targets are to reflect need and degree of development in area. Much of the public participation will be at the plan making stage.

Development will be required to be determined within the 8 or 13 week period. Decisions will be helped by Local and National design codes and pattern books. Where appeals against the Local Planning Authority are successful, the applicant will be entitled to a refund.

It is proposed to abolish Planning Obligations and replace with a Nationally Set Infrastructure Tariff, which is expected to help fund Planning and Enforcement Services.

Plan Making Proposals

Growth areas will be "suitable for substantial development", a term to be defined in policy. This category would include land suitable for:

- comprehensive development, including new settlements and urban extension sites
- areas for redevelopment, such as former industrial sites or urban regeneration sites.
- proposals for sites such as those around universities where there may be opportunities to create a cluster of growth focused businesses.

Suitable development uses, heights and densities would be set out for this area, or sub-areas within it. Areas or sites under this category would have outline approval for development. Areas of flood risk would be excluded from this category (as would other important constraints), unless any risk can be fully mitigated.

Growth areas would also include sub-areas specifically for self and custom-build homes, and community-led housing developments, with the amount of land identified being sufficient to meet demand based upon existing self-build registers.

Renewal areas would be "suitable for development" covering existing built areas where smaller scale development is appropriate, including:

- gentle densification and infill of residential areas
- development in town centres
- development in rural areas such as small sites within or on the edge of villages that is not annotated as Growth or Protected areas,

Suitable development uses, heights and densities would be set out for this area, or sub-areas within it. There would be a statutory presumption in favour of development being granted for the uses specified as being suitable in each area. Local authorities could continue to consider the case for resisting inappropriate development of residential gardens.

Protected areas would include sites and areas with particular environmental and/or cultural characteristics that justify more stringent development controls. This would include:

- Green Belt
- Areas of Outstanding Natural Beauty (AONBs)
- Conservation Areas
- Local Wildlife Sites
- Areas of significant flood risk
- Important areas of green space.
- Gardens in line with existing policy in the National Planning Policy Framework.
- Areas of open countryside outside of land in Growth or Renewal areas.

The White Paper includes two alternative proposals. One where Growth and Renewal areas are combined into one area benefitting from permission in principle. The second alternative is to remove the permission in principle from Growth areas, with outline and detailed planning permissions as they are today.

Development management policies are established at national scale and there is an altered role for Local Plans. Rather than each local plan containing a set of topic-based policies (such as heritage, ecology, design), a suite of policies would be set at the national level for all local planning authorities and applicants to follow.

Site or area-specific policies would still be allowed, but these would be more prescriptive or 'rules-based' rather than being general criteria-based. There would also be a more prominent or 'up front' role for design codes and guides that would be created as part of the plan-making process (either within the plan or as separate SPDs prepared in parallel).

The White Paper suggests alternative approaches with varying degrees of opportunity to create development management policies locally that respond to localised issues or circumstances, but still more constrained that the current system allows.

The four tests of soundness and some legal requirements would be replaced by an assessment of whether the plan contributes to achieving sustainable development. This, it is proposed, would reduce the amount of supporting evidence and assessment required to prepare a Local Plan. Specifically, it is proposed that Sustainability Appraisal and the Duty to Cooperate would be abolished (both currently major legal requirements) and replaced by lighter touch environmental assessments and cross-boundary local infrastructure planning, although no details of this are provided. A reduced 'deliverability' test would also be a feature of the new process. An alternative proposal is to reform the current tests of soundness, with 'reserve sites' being identified to come forward if needed.

It proposes that development needs, not limited to housing, will be identified and met for a minimum period of 10 years (although it is not clear what the start year would be). The housing requirement identified via the new Standard Method would be binding. Presently, local planning authorities can currently argue exceptional

circumstances for providing a lower figure than that identified via the current Standard Method.

However, the main shift in the Standard Method proposed here is that is becomes more akin to a 'policy on' assessment, in that in addition to local affordability pressures (a feature of the current Standard Method) the housing requirement would also be informed by an assessment of opportunity vs constraint. The White Paper proposes to remove the five-year housing land supply test (assuming greater certainty of delivery under the new plan-making and development management system), but that the Housing Delivery Test would be maintained.

At the heart of this proposal is a nationally-set way in which Local Plans are written, formatted and published to effectively make the Local Plan a web-based interactive visual interface. The intention is to make Local Plans more digitally accessible so that communities, developers (particularly SME developers) and the emerging Property Technology sector can more easily understand and act upon local plans for growth. It is envisaged that the nationally set standards would be introduced ahead of any legislation required to enact the other proposals affecting plan-making.

Alongside how Local Plans are to be presented is to profoundly re-invent the ambition, depth and breadth with which local planning authorities engage with communities. No practical details explaining how this might work are given in this regard besides that contained in proposal 8 (see below).

This proposal seeks to shorten and set a statutory limit for the time taken to prepare a local plan to 30 months from start to finish (although transitional arrangements would allow 42 months in certain circumstances). This would be achieved via five stages:

1. Stage 1 (6 months): a call for suggestions as to where new growth should go (according to the three areas set out under proposal 1) and what it should look like.
2. Stage 2 (12 months): the local planning authority prepares necessary evidence and drafts a plan.
3. Stage 3 (6 weeks): the local planning authority simultaneously submits the plan for examination along with a Statement of Reasons for the plan, and commences a public consultation on the submitted plan, utilising 'best in class' methods of public involvement.
4. Stage 4 (9 months): An inspector examines the plan, considering whether it represents sustainable development thereby meeting the new single test. Parties can be heard by the inspector during this stage, via a range of methods as deemed appropriate by the inspector. Any changes to the plan that the inspector makes, to ensure it meets the single sustainable development test, would be binding.
5. Stage 5 (6 weeks): Local plan comes into force.

Local planning authorities that fail to do what is required to get their plan in place, or keep it up to date, would be at risk of government intervention taking into account a range of factors.

Alternative proposals include reforming the examination process so that it is shorter (curtailing the right of third parties to be heard and conducting it via written representations), or removing the examination process altogether and replacing it with a process of self-assessment by local planning authorities and sampled auditing of plans by the Planning Inspectorate.

Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools. There is a particular call for ideas on making use of digital tools and allowing neighbourhood plans to exist for smaller areas (e.g. individual streets)

Design codes and masterplans prepared for substantial development identified in Growth areas would allow for a wider variety of development types to come forward. This, it is suggested, would widen the range of builders working on any given substantial development, thereby speeding up delivery of houses.

A quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.

This proposal lacks any detail of what a revised approach to environmental assessment at the plan-making stage would consist of, the intended objectives of any revised approach are greater front-loading of assessments and by making data more easily available, a more coherent and consolidated set of requirements for environmental assessment and mitigation and greater emphasis upon taking opportunities for environmental improvements alongside meeting domestic and international obligations for environmental protection.

Decision- Making Proposals

For Growth Area where the Local Plan has identified land for development, planning decisions should focus on resolving outstanding issues – not the principle of development. Further details would be agreed and full permission achieved through streamlined and faster consent routes which focus on securing good design and addressing site-specific technical issues. Possibly a Local Development Order, Reserved Matters, Development Consent Order for Nationally Significant Infrastructure Project sites

Renewal-General presumption in favour of development established in legislation and consent for development would be granted in one of three ways:

- for pre-specified forms of development through a new permission route which gives an automatic consent if the scheme meets design and other prior approval requirements.
- for other types of development, a faster planning application process where a planning application for the development would be determined in the context of the Local Plan description with reference to the National Planning Policy Framework; or
- a Local or Neighbourhood Development Order.

Exceptionally specific planning permission(s) for proposals different from the plan could be granted in Growth or Renewal areas.

For Protected areas any development proposals would come forward the same way as they do now, ie. as planning applications being made to the local planning authority (except where they are subject to permitted development rights or development orders) and judged against policies set out in the National Planning Policy Framework.

The well-established time limits of 8 or 13 weeks for determining an application from validation to decision should be a firm deadline. In particular, the validation of applications should be integrated with the submission of the application so that the right information is provided at the start of the process.

The Government will prepare a specific, investable proposal for modernising planning systems in local government for the spending review. Working with technological companies and local planning authorities, the aim is to modernise the software used for case-managing a planning application to improve the user-experience for those applying and reduce the errors and costs currently experienced by planning authorities.

The amount of key information required as part of the application should be reduced considerably and be machine-readable. A national data standard for smaller applications should be created.

For major development, beyond relevant drawings and plans, there should only be one key standardised planning statement of no more than 50 pages to justify the development proposals in relation to the Local Plan and National Planning Policy Framework.

Standardisation of data including a digital template for planning notices will be created so that planning application information can be more effectively communicated and understood by local communities, data-rich planning application registers, standardised planning contributions, planning conditions technical supporting

information and decisions so usable by new digital services planning application information can be easily found and monitored at a national scale, and new digital services can be built to help people use this data in innovative ways.

There should be a clear incentive on the local planning authority to determine an application within the statutory time limits. Failure to do so, result in the automatic refund of the planning fee for the application if they fail to determine it within the time limit. Additionally, deemed planning approval for some types of applications if there has not been a timely determination could be granted.

There will remain a power to call in decisions by the Secretary of State and for applicants to appeal against a decision by a local planning authority. Where applications are refused, applicants may be entitled to an automatic rebate of their planning application fee if they are successful at appeal.

Proposals for Built and Natural Environment

National Design Guide, National Model Design Code and the revised Manual for Streets will have a direct bearing on the design of new communities married with locally developed design guidance. A body to support the delivery of locally popular design codes is proposed, together with each authority having a chief officer for design and placemaking.

Exploring the options for establishing a new expert body will help authorities make effective use of design guidance and codes, as well as performing a wider monitoring and challenge role for the sector in building better places.

The proposal is to consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places. The Building Better, Building Beautiful Commission recommended that Homes England should attach sufficient value to design as well as price, and give greater weight to design quality in its work.

'Fast-track for beauty' through changes to the National Planning Policy Framework is proposed, where plans identify areas for significant development (Growth areas).Legislation will require that a masterplan and site-specific code are agreed as a condition of the permission in principle which is granted through the plan. This should be in place prior to detailed proposals coming forward, to direct and expedite those detailed matters.

In line with the 25 Year Environment Plan, the reformed system will play a proactive role in promoting environmental recovery and long-term sustainability, including the mitigation and adaptation to climate change and reduce pollution as well as making

our towns and cities more liveable through enabling more and better green spaces and tree cover.

The Environment Bill currently before Parliament will legislate for mandatory net gains for biodiversity as a condition of most new development. Local Nature Recovery Strategies will also identify opportunities to secure enhancements through development schemes and contributions with a consequent amendment to the NPPF.

The planning system has played a critical role ensuring the historic buildings and areas we cherish are conserved and, where appropriate, enhanced by development. Historic buildings play a central part in the renewal of our cities, towns and villages. More historical buildings have the right energy efficiency measures to support our zero carbon objectives.

There will be a review and update of the NPPF, ensuring the significance is conserved while allowing, where appropriate, sympathetic changes to support their continued use and address climate change. This includes exploring whether suitably experienced architectural specialists can have earned autonomy from routine listed building consents.

From 2025, we expect new homes to produce 75-80 per cent lower CO2 emissions compared to current levels. These homes will be 'zero carbon ready', with the ability to become fully zero carbon homes over time as the electricity grid decarbonises, without the need for further costly retrofitting work.

Proposals for Infrastructure Funding

Planning Obligations are opaque and create delay despite the planning application being acceptable in principle. CIL, with payment due once development commences, is inflexible in the face of changing market conditions

An Infrastructure Levy should be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally set rate or area specific rates and the current system of planning obligations abolished. Revenues would be collected and spend locally.

Charged on the final value of a development based on the applicable rate at the point planning permission is granted and levied at point of occupation, with prevention of occupation being a potential sanction for non-payment. A value-based minimum threshold below which the levy is not charged is included to prevent low viability development becoming unviable, reflecting average build costs per square metre, with a small, fixed allowance for land costs

Local authorities will be able to borrow against Infrastructure Levy revenues so that they could forward fund infrastructure. Enabling borrowing combined with a shift to levying developer contributions on completion, would incentivise local authorities to deliver enabling infrastructure, in turn helping to ensure development can be completed faster. The London Mayoral Community Infrastructure Levy, and similar strategic Community Infrastructure Levies in combined authorities, could be retained as part of the Infrastructure Levy under this approach.

Alternatively, the Infrastructure Levy could remain optional and would be set by individual local authorities. The aim of the de minimis threshold would be to remove the viability risk, simplifying the rate setting process, as this would remove the need for multiple charging zones within an authority. It would be possible to simplify further – for instance, for the Government to set parameters. In addition, some local authorities have chosen not to introduce the Community Infrastructure Levy out of concern for the impact on viability of development. Because the new Infrastructure Levy would only be charged above a set threshold, these impacts would be mitigated.

Another alternative could be to set a national rate but with the aim of capturing more land value than currently, to better support the delivery of infrastructure. This would ensure that the landowners who benefit from increases in value as a result of the grant of planning permission contribute to the infrastructure and affordable housing that makes development acceptable.

The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights even where there is no additional floorspace, and for some permitted development rights including office to residential conversions and new demolition and rebuild permitted development rights. However, the exemption of self and custom-build development from the Infrastructure Levy will remain.

Developer contributions currently deliver around half of all affordable housing, most of which is delivered on-site. The Infrastructure Levy could raise funds to secure affordable housing, through in-kind delivery on-site. Local authorities would have a means to specify the forms and tenures of the on-site provision, working with a nominated affordable housing provider with the difference between the price at which the unit was sold to the provider and the market price would be offset from the final cash liability to the Levy.

An alternative option would be for the local authority to have a ‘first refusal’ right for local authorities or any affordable housing provider acting on their behalf to buy up to a set proportion of on-site units (on a square metre basis) at a discounted price, broadly equivalent to build costs. The proportion would be set nationally, and the developer would have discretion over which units were sold in this way.

More freedom could be given to local authorities over how they spend the Infrastructure Levy, tailored to each authority's circumstances but with a certain amount ring fenced Levy funding for affordable housing to ensure that affordable housing continues to be delivered on-site at current levels (or higher).

Proposals for Funding and Operation of Planning and Planning Enforcement Services

There will be a need to develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms, the cost of operating the new planning system should be principally funded by the beneficiaries of planning gain, rather than the national or local taxpayer.

Currently, the cost of development management activities by local planning authorities is to a large extent covered by planning fees, although the current fee structure means the cost of processing some applications can be significantly greater than their individual fee. However, the cost of preparing Local Plans and enforcement activities is now largely funded from the local planning authority's own resources.

Planning fees should continue to be set on a national basis and cover at least the full cost of processing the application type based on clear national benchmarking. This should involve the greater regulation of discretionary pre-application charging to ensure it is fair and proportionate.

A small proportion of the Infrastructure Levy income should be earmarked to local planning authorities to cover their overall planning costs, including the preparation and review of Local Plans and design codes and enforcement activities.

Local planning authorities should be subject to a new performance framework which ensures continuous improvement across all planning functions from Local Plans to decision-making and enforcement with early intervention if problems emerge with individual authorities.

The Planning Inspectorate and statutory consultees should become more self-financing through new charging mechanisms and be subject to new performance targets to improve their performance.

Workforce planning and skills development, including training, should be principally for the local government sector to lead on, working closely with Government, statutory consultees, planning consultancies and universities.

Reform should be accompanied by a significant enhancement in digital and geospatial capability and capacity across the planning sector to support high-quality new digital Local Plans and digitally enabled decision-making.

In developing this strategy, we recognise different local planning authorities face different pressures and issues, and it will be important to develop a resourcing and skills framework which works for all authorities across the country. We will work with local planning authorities, professional bodies and the wider planning sector to ensure views about implementation are considered. Innovative solutions can transform practice.

At the same time, enabling a thriving PropTech sector through a Minister-led PropTech Innovation Council (announced in November 2019) will make the most of innovative new approaches to meet public policy objectives, help this emerging sector to boost productivity in the wider planning and housing sectors, and ensure government data and decisions support the sector's growth in the UK and internationally.

Local planning authorities should place more emphasis on the enforcement of planning standards and decisions. Planning enforcement activity is too often seen as the 'Cinderella' function of local planning services. Local communities want new development to meet required design and environmental standards, and robust enforcement action to be taken if planning rules are broken.

As local planning authorities are freed from many planning requirements through our reforms, they will be able to focus more on enforcement across the planning system. Introduce more powers to address intentional unauthorised development, consider higher fines, and look to ways of supporting more enforcement activity and will also consider what more can be done in cases where the Environment Agency's flood risk advice on planning applications is not followed.

Paper for more immediate proposals for Changes to the Planning System

There are four main proposals outlined within the consultation document as summarised below:

1. Standard method for assessing housing numbers in strategic plans:
2. Delivering First Homes
3. Supporting small and medium-sized developers (SMEs)
4. Extension of the current Permission in Principle regime

The first proposal comprises changes to the standard method first introduced in the 2018 NPPF. The new method will now set a baseline housing requirement figure based

The aim of the new method is to ensure delivery of the Government's country-wide annual target of 300,000 homes; to enable a more appropriate distribution of homes; and, to try and improve affordability in those areas where it has worsened in recent years.

For Milton Keynes, the new method would result in a housing requirement figure of 1,417 dwellings per year, compared to 1,767 in Plan:MK. The consultation document does however imply that this figure is expected to form the starting point of an authority's housing requirement.

Secondly, a policy that a minimum of 25% of all affordable housing units secured through developer contributions should be 'First Homes'; a new form of Affordable Housing to support first time buyers. Two options are outlined for the remaining 75% of affordable provision:

- Option A: First homes should firstly replace other affordable home-ownership products and, where this would replace all home ownership products (as would be the case in Milton Keynes), any rental products should be delivered in the same ratio as set out in the Local Plan policy.
- Option B: the LPA and developer can negotiate the tenure mix for the remaining 75%.

Under current Plan:MK policy, this would completely replace the provision of shared ownership products and would also lead to a small reduction to the provision or affordable and social rented properties.

The level of discount to be applied for 'First Homes; is also proposed to be set at 30% from market price, to be set by an independent registered valuer. LPA's will have discretion to raise this to 40% or 50%, but this needs to be evidenced through the Local Plan process.

The third proposal is to reduce the burden of contributions on them for more sites for a time-limited period of 18 months, subject to review by raising the small sites threshold for affordable housing contributions up to either 40 or 50 new homes, from existing policy of 10 new homes. The current threshold will however be maintained for designated rural areas.

Lastly, the proposal is to extend the scope of the current Permission in Principle (PiP) by application route to incorporate major development, would retain some restrictions (such as those relating to EIA and Habitats) and PiP will not be suitable for sites capable of delivering over 150 dwellings or more than 5 hectares. For commercial development, incorporated within a housing-led scheme, the consultation proposes to remove the 1,000 sq m limit for commercial development floorspace.

The existing consultation and determination procedures currently used (5-week determination period and 14-day period for consultation) will apply as will the same information requirements, albeit with some scope for additional information to be included for major development proposals.

To promote the use of PiP it also proposed to lower the fees for these types of applications; the consultation document sets out a preferred method for a banded fee structure based on a flat fee per hectare with a maximum cap based on site size.

The paper also identifies that the Government is soon to publish a national Brownfield Land Register map which will automatically record those sites suitable for housing, including those which obtain PiP through the above route.

Questions Arising

As always, the 'devil is in the detail' and whilst the general thrust of the reforms are clear; to move from a discretionary to rules based planning system, to push local involvement towards plan making from the decision making stage and to fund the system through the value added as a result of development rather than from the planning fees and local authority budgets raises many questions.

1. The reconfiguring of the planning system will require time, training and resources and apart from vague intentions to fund this through the government spending reviews there is little detail about how this would be met both within the Planning Inspectorate and local government.

2. It is proposed to consider the most effective means for neighbours and other interested parties to address any issues of concern where, under this system, the principle of development has been established leaving only detailed matters to be resolved lacks detail.

3. The proposal to consolidate other existing routes to permission which have accumulated over time, including simplified planning zones, enterprise zones and brownfield land registers does not explain how such routes still have a role in the reformed system and what the implications are.

4. With regard to the planning process the statutory time limits for determination not being able to be subject to an extension of time and the potential for refunds for late decision making or decisions overturned on appeal raise questions in relation to working with developers, discretionary income through Planning Performance agreements and pre-application services, the often poor quality of applications submitted and whether there is a need for a validation list with the proposed reforms.

5. Whilst it is envisaged design codes will help to reduce the need for significant supplementary information, the commitment to Environmental Quality and tackling climate change as well as technical matters such as highways impacts will necessarily require detailed information to be submitted.

6. With regard to standardised templates and planning conditions are there not standard templates and conditions for most matters already? The need for bespoke conditions tailored to an application is not taken on board

7. With regard to local democracy, the delegation of detailed planning decisions to planning officers where the principle of development has been established, as detailed matters for consideration should be principally a matter for professional planning judgment. The overwhelming majority of applications are determined under delegated powers, what questions does this raise for local democracy and the role of Planning Committees?

8. Reliance on the infrastructure levy funding the planning and planning enforcement service would not apply where the viability of development would be such as to not attract such a levy. There is no detail as to how such services might be funded. As planning fees would remain, it is surprising that there is no consideration of the continued role these will play in funding planning services.

9. Reliance on Infrastructure levy funding for affordable housing and other infrastructure and allowing Local authorities to borrow again this to secure infrastructure improvements is recognised as a transfer of risk to the local planning authority, there is a lack of detail, especially with the proposal to raise the threshold for affordable housing contribution proposed outside of this paper

10. Questions arise about what is not included at all in the proposal such as retail and industrial development, issues of accessibility for all and planning for the elderly. The wish to strengthen powers of enforcement do not say with a rules based system whether this system will be legally binding nor importantly whether enforcement action will remain a discretionary function of local government.

11. The proposed changes to the Planning System in relation to housing delivery, permission in principle and affordable housing raises further questions with regard to the likelihood of significantly reduced planning fee income, affordable housing requirements for major development and infrastructure funding when applied to the current system. It is not clear to what extent these more immediate reforms will be retained or fall away under the more sweeping reforms set out in the Planning for the Future White Paper.

Financial	x	Human rights, equalities, diversity	x
Legal	x	Policies or Council Plan	x
Communication		Procurement	
Energy Efficiency	x	Workforce	x

a) Financial implications

With the proposed infrastructure levy being proposed as the key way to fund planning services and the expected reduction in planning fees and fees for discretionary planning services such as pre-applications, the implication could be considerable. It is not clear how much time will be given for local authorities to calculate the income raising potential within the new system compared to the current system and the resource implications between the Plan Making and Development Management arms of local authority planning.

b) Legal implications

With a proposed move from a discretionary to rules based system, similar to other countries, will the local plan move to become legally binding from an administrative system?

The proposals would imply that the issues of compliance and enforcement become more clear cut and less discretionary in terms of whether formal action should be pursues. The types of sanction to could potentially be widened to be more like other local authority enforcement services. With this in mind it is not clear that the enforcement notice with its right of appeal will remain viable.

c) Energy Efficiency

The proposed reforms are closely aligned with the Environment Bill and the 25 year environment plan and will require significant change to National Planning Policy guidance. However, the general thrust with regard to delivering sustainable development remains unchanged.

d) Human Rights, Equality and Diversity

The proposed reforms do not have any detail with regard to human rights and diversity matters. It is disappointing that this is not considered at all, especially the implications for accessibility for all.

e) Policies or Council Plan

The potential impact will be profound with a more streamlined shorter approach to plan making and adoption and several options for realising this. It is not clear with a very recently adopted Local Plan with an early review what will be required for Milton Keynes regarding future plan making under the new system. There is a wish to push the participatory process in planning toward the plan making stage with a significant reduced need as it is envisaged for such oversight at the decision stage given the new rules based approach.

Given the degree of variation in the age of local plans around the country, it is not clear what kind of lead in time for producing a new plan will be.

f) Workforce

The proposed change in emphasis in the planning system, including plan making and the proposed changes to the way it is funded and how infrastructure and affordable housing is delivered is likely to have significant implications for the Directorate's workforce with a potential need for restructuring, retraining and the need for external consultants where in house expertise is lacking or absent.

It is unclear however what the likely timescales are for the passage of the legislation through Parliament nor for the actual proposals that become law

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List of annexes

Annex A – Planning for the Future White Paper
https://www.gov.uk/government/consultations/planning-for-the-future
Annex B- Changes to the Current Planning System
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907215/200805_Changes_to_the_current_planning_system_FINAL_version.pdf