



Planning for the Future White Paper High Weald AONB Partnership Response

<https://www.gov.uk/government/consultations/planning-for-the-future>

Consultation by MHCLG, expiry 29th October 2020

Emailed to planningforthefuture@communities.gov.uk

The following response broadly follows the questions asked in the consultation but does not include questions that are not relevant to the Partnership's objectives of conserving and enhancing the AONB. In some cases the questions have been abridged to remove inaccurate or leading elements.

General comments

The three main messages are as follows:

1. **The three zone system proposed is too simplistic. Protected areas like AONBs will need some small scale, organic growth to support their communities and Growth and Renewal areas will need some protected parts for nature recovery and green spaces for health and wellbeing. A more nuanced approach will be needed to achieve sustainable and healthy places.**
2. **The binding housing requirements for local planning authorities must be based on evidence of landscape character and capacity rather than the application of a formula, especially where they have a large proportion of AONB.**
3. **The planning reforms should incorporate the relevant parts of other Government workstreams such as the Glover Review recommendations on planning and the Environment Bill proposals for nature recovery and biodiversity net gain.**

In September 2019 the Landscapes Review into National Parks and AONBs led by Julian Glover was published. A response to this review by Government is still awaited. Proposal 6 in the Review was:

"A strengthened place for national landscapes in the planning system with AONBs given statutory consultee status, encouragement to develop local plans and changes to the National Planning Policy Framework".

The High Weald AONB Partnership strongly supports these recommendations and would wish to see them incorporated in any planning reforms.

On Monday 28 September 2020 the Prime Minister announced that he intends to protect 30% of the UK's land for nature by 2030. The Government press release confirms that existing National Parks, Areas of Outstanding Natural Beauty and other protected areas already comprise approximately 26% of land in England, but an additional 4% – over 400,000 hectares – will be protected to support the recovery of nature. This commitment is very welcome but will be ineffective if the existing Areas of Outstanding Natural Beauty are

required to take the volume of new development indicated by the new standard method for calculating housing need. The proposals in the White Paper to adjust these figures to account for constraints such as AONB are welcomed, and the Partnership looks forward to future engagement on how these constraints will be applied. It recommends that there should be a robust, evidence-based approach which takes into account landscape character and capacity rather than the application of a formula.

Responses to Questions

Question 3 - How would you like to find out about plans and planning proposals in the future?

Digital means of publicising plans and planning proposals in the area should be used but not at the expense of paper methods. People should not be barred from engaging in the planning system just because they don't have digital capabilities. In a rural area such as the High Weald AONB many people do not have access to the internet or have very slow internet speeds which make uploading documents impractical. Others, especially older people, may not have the expertise or desire to engage digitally. In making the planning system more accessible to those who do have digital capabilities, it must not leave behind those who don't.

The proposals do not make it easier for local people to contribute their views. The stated ambition that more democracy will take place at the plan-making stage with a radically and profoundly re-invented engagement with local people can only be fulfilled if sufficient time, resources and expertise are made available to local authorities at this early stage. The proposals fail to ensure this.

We would like to be engaged, and we would like our local communities to be engaged, through participative engagement processes (as championed by the Building Better Building Beautiful Commission), which require trained facilitators able to reach all sectors of the community, and with time to explore evidence, seek views and build consensus. Simply viewing an online plan is no substitute.

Question 5 - Do you agree that Local Plans should be simplified in line with our proposals?

No, the proposed zonal system is too simplistic. Planning is about more than housing and separation into only three zones does not reflect the complexity that is necessary to plan new or renewed places. It also does not reflect the fact that 'protected areas' like AONBs will need some development to support their communities and land management. Also, growth and renewal areas will need green infrastructure, open green spaces, nature recovery areas and some direction about the location of different types of development to ensure that needs are met and any development creates or enhances sustainable communities and quality of life. In reality these three zones will have to be broken down into many sub-areas to be useable as a land-use planning system which will reduce the simplicity proposed.

Question 6 - Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

No because different areas will have different issues and priorities, and this reduces the opportunity for more innovative and locally specific policies such as policies on tranquillity, dark night skies and ecosystem services. Whilst a suite of national policies (worded as legally binding policies not woolly guidance as per the current NPPF) would be useful to avoid every plan having to include very similar policies, there should also be the ability for Local Plans and Neighbourhood Plans to have additional or varied policies where justified by local circumstances.

Question 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?

We await further detail on the new consolidated sustainable development test. Although sustainable development is a much-used term, it is open to multiple interpretations. It is essential that the new system uses the internationally accepted Brundtland definition namely: ‘Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.’ It is also not clear how compliance would be evaluated if Sustainability Appraisals are to be abolished. Whilst not perfect these do at least provide a consistent methodology for assessing plans against the whole spectrum of sustainability impacts not just the narrow approach often used by planners of whether users of a development can access facilities without use of a private car.

Sustainable development is not about striking a balance between environmental, social and economic objectives, but about maximising positive outcomes across all three at the same time. To achieve this requires a fundamental re-think in the Government’s approach to plan making. The current proposals privilege housing development over other land uses. Plan-making should be integrated, holistic and positive, seeing the natural and built environment characteristics as integral to place making across all landscapes and valuing other land uses such as healthy food production and nature recovery equally alongside housing requirements. A sustainable development test should reflect consideration of all these aspects.

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

The Duty to Cooperate has failed to deliver on cross boundary strategic issues. Bringing back a higher tier of plan making, or a strategic process, would make local plan preparation significantly quicker and more efficient. Indeed, the current planning system could be much improved by the introduction of such a change without the need to bring in a whole new planning system.

The most difficult cross-boundary issue for local authorities to solve has been the distribution of housing numbers. The White Paper proposes to remove this issue from local planning authorities and suggests that the requirement for each local planning authority will be set centrally, based on the new standard method of assessing housing need adjusted for constraints. No detail is provided as to how these numbers will be set, what methodology will be used or how anyone will be able to input to the decision.

A process should be put in place to establish the right numbers for each local planning authority which allows interested bodies and individuals to submit evidence and have it heard by an independent body such as the Planning Inspectorate. This process could also take into account other cross-boundary matters such as the need for strategic infrastructure and make binding requirements for inclusion in Local Plans. The two issues cannot be separated out because the provision of infrastructure may facilitate or be paid for by an increase in housing provision.

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

The standard method proposed in the accompanying paper ‘Changes to the Current Planning System’ disproportionately affects London and the South East whilst decreasing numbers in the north. Both the household projections and the affordability part of the formula just perpetuate the situation where most economic growth is focused in London and the South East. This is also an area where there is a high concentration of AONB, National Park and Greenbelt. The consequence of the numbers coming out of the standard method for this area puts huge pressure on these protected areas. The table below shows the consequences for the LPAs with land in the High Weald AONB.

Local Authority (% in AONB)	Adopted Local Plan dpa	Current Method	Proposed Method
Ashford (14%)	1,093	970	1,211
Crawley (1%)	340	476	598
Hastings (18%)	215	451	453
Horsham (7%)	800	920	1,715
Mid Sussex (49%)	964	1,114	1,305
Rother (83%)	335	736	1,173
Sevenoaks (16%)	165	711	820
Tandridge (4%)	125	646	533
Tonbridge & Malling (0.4%)	425	843	1,440
Tunbridge Wells (69%)	300	678	893
Wealden (53%)	450	1,225	1,199

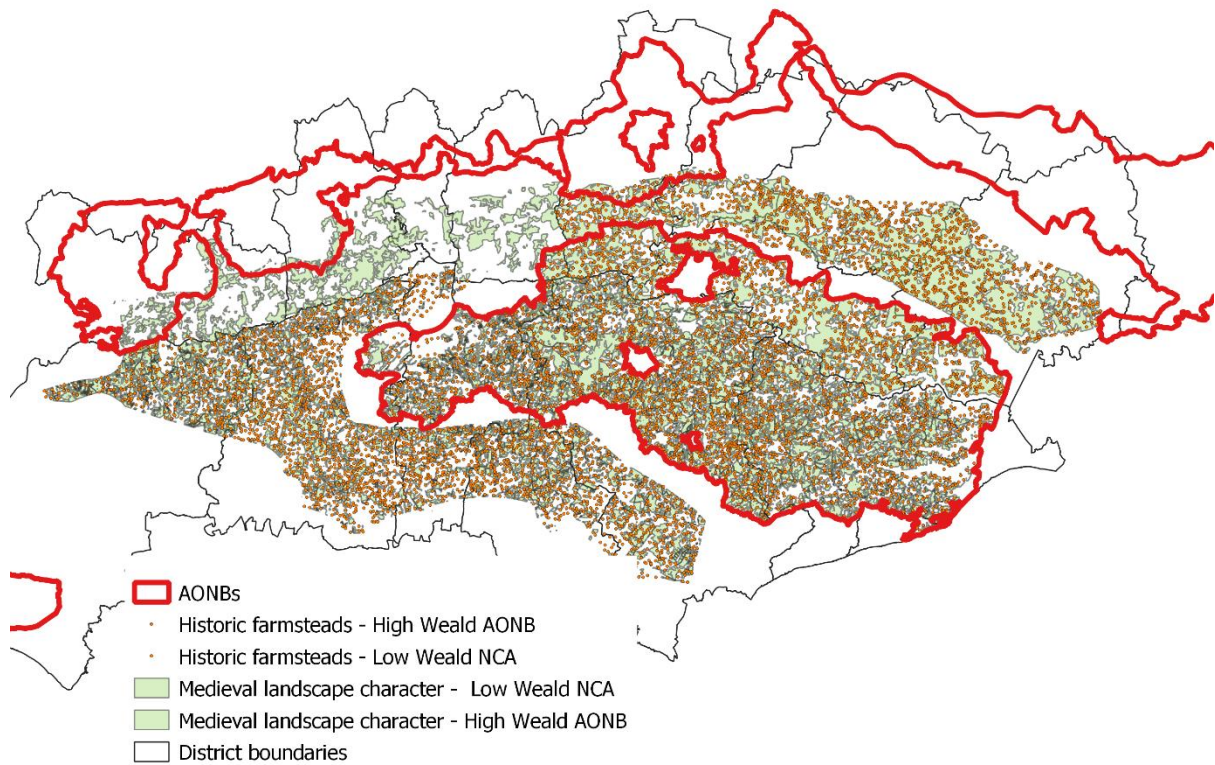
Instead of blindly applying a formula, the housing requirements for each LPA should be evidence based including assessments of landscape capacity – that is consideration of what is valued in a place and its sensitivity to change applied at a fine-grained scale – and scrutinised properly through a process such as that suggested in our answer to Question 7b.

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

No. The affordability issue in the South East is not due to restrictions in supply but because of its proximity to London and its higher paid jobs. The level of affordability should instead prompt an increase in the supply of affordable homes. In addition, the high housing numbers the formula produces for the South East are not sustainable or deliverable because this part of England is highly constrained by Green Belt, National Parks and AONB. Most urban areas are also constrained by tight administrative boundaries so are unable to expand within their own local planning authority area (see Brighton, Crawley and of course London).

Landscape capacity should be a key indicator of the quantity of development to be accommodated. The map below illustrates the density of historic landscape character – including surviving medieval field systems, ancient woodland and historic farmsteads - in the

High Weald AONB and adjacent Low Weald National Character Area. The High Weald AONB is protected for its nationally valued outstanding beauty but it is evident that surviving historic landscape features, which are associated with undisturbed soils and high biodiversity, are also present across the adjacent undesignated landscape of the Low Weald. These features are intimately connected both socially and ecologically across these adjoining landscapes and any robust method for calculating housing numbers should include landscape capacity and be sufficiently fine-grained to take account of these constraints.



9(a). Do you agree that there should be automatic permission for areas for substantial development (Growth areas) with faster routes for detailed consent?

No, because these faster methods will not be able to take proper account of all the relevant evidence. For instance, at Local Plan stage, it will only be possible to identify high level mapable constraints such as flood plains and land previously designated for its ecological value (SSSIs etc). It would not be feasible to carry out site by site ecological surveys of all potential growth areas given the tight timescale proposed for Local Plans. This means that much of the detailed information will not be available until the planning application stage. Some of this information may also change over time – a species poor field could have improved to species rich in the period between allocation as part of a growth area and detailed application. Any fast tracking of the application process would not be able to take account of such changes.

9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?

No the same points raised in response to question 9(a) are relevant to Renewal areas. Even if these are restricted to previously developed sites there will still be changes in needs and

constraints between Local Plan zoning and detailed application stage. The reduced opportunity for consultation and delegation to officers for these consents is also very concerning as most people will not know how proposals will affect them until the detailed stage.

For protected areas there is no clarity about what sort of development will be considered appropriate, and the assumption is that planning applications will have to be submitted as at present. Under the current system inappropriate major development is being permitted in the High Weald AONB and we remain concerned that this will not change under the new system. We would like to see AONB partnership powers, and those of our local authority partners strengthened to prevent large scale development in nationally important landscapes.

It appears that there may be protected areas within renewal or growth areas (such as flood plains, green space, nature recovery areas etc) where no development would be appropriate. But the protected zone would apparently cover National Parks and AONBs, many of which have whole towns and large villages within their boundaries. There is no indication how these would be treated. Clarification is sought from the Government that a limited amount of development, ideally focused on affordable housing, will still be possible within an AONB without the need to designate renewal or growth areas in this designated landscape.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

No, this is just a way of taking these important local decisions out of the hands of democratically elected councillors. If housing numbers are to be binding then it should be left to LPAs to decide the best way to meet these.

10. Do you agree with our proposals to make decision-making faster and more certain, and make greater use of digital technology?

No. Development Management has a key role in ensuring that development is sustainable, contributes to the sense of place and meets the needs of the area. Particularly in complex applications the expert judgement of the planning officer and other specialists involved is crucial to placemaking and cannot be reproduced by digital means or significantly speeded up. Our view is that this section of the White Paper is overly weighted toward the interests of developers and landowners and does not recognise the importance of expert judgement or the need to make careful decisions about development that will have a lasting impact on the area.

We are concerned about machine readable applications. While some of the application maybe standardised, key information required as part of the application is by necessity place specific. No substantive applications should be passed without being judged by a planning officer who can apply current and local place-specific knowledge to the decision.

The amount and length of supporting reports in the English planning system has grown considerably in recent years and while it is not easy to demonstrate that this has increased the quality of outcomes, we do not agree that shorter planning applications, with a reduced

amount of key information, are always desirable. While a focus on clarity and conciseness is welcome, many development proposals, particularly in valued or sensitive landscapes, will require detailed assessments across a variety of issues, including ecology and landscape, which should not be contained by a maximum page number. This approach can be gamed by developers through inserting summary tables and images, rather than undertaking proper analysis thereby making scrutiny more difficult.

We are concerned that a standardised 50-page planning statement will be unable to provide all the necessary information to prove biodiversity net gain, all the viability evidence to support the level of affordable housing provision or a heritage statement on a proposal involving heritage assets. The standard of ecological information submitted for planning applications is generally poor and it would be challenging to provide all the necessary information as required by the Environment Bill to prove biodiversity net gain within such a short statement.

The proposal to refund the planning application fee if an application is not determined in time is not supported. We consider that this would lead to an increase in LPAs determining applications as they stand and not taking any revisions in order to meet the deadlines. In reality this is therefore likely to increase the number of refusals. Giving deemed consent if the deadline is missed is also not supported. It is difficult to see why local communities should effectively have to suffer unacceptable development that is allowed by default. Lastly, the proposal to refund the application fee if a development is refused and allowed on appeal is based on the false premise that all such LPA decisions are wrong or unreasonable. Many appeals are very complex and come down to professional judgement by the Inspector having weighed up all the issues. This doesn't mean the original decision was wrong, just that decision-makers have come to different judgements on the importance of the issues concerned. Where decisions by the LPA are unreasonable there is already a route for developers to apply for costs.

Finally the proposed increased use of Planning in Principle which requires no supporting evidence and delegating all detailed stage applications to officers is not supported as many issues will not be detectable at the early stage or may change over time, and these proposals reduce public scrutiny and democratic accountability.

11. Do you agree with our proposals for digitised, web-based Local Plans, supported by a new national template?

Whilst this is supported in principle there must still be opportunities for people to engage in Local Plans where they do not have digital skills or the technology. Consultation works best where a variety of methods are used to maximise the number and diversity of people engaging in a consultation. Restricting engagement or the content of Local Plans to digital forms would disproportionately affect older people and those in rural areas with poor or no internet.

A data led digitised planning system is only as good as the data fed in. The proposal for a national template will lead to an undermining of local character and distinctiveness if only national data sets are used. Any template should be able to accommodate locally originated data sets providing information on locally important characteristics and features.

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?

No. We agree that it currently takes too long to prepare a local plan. However, we think 30 months to be unrealistic and the individual stages need to be given more thought. As an overarching comment the proposed system does not allow people to engage meaningfully with the process. The new system does not provide sufficient time to resolve inherent conflicts in the plan making process. Plan making cannot be done simply through the application of an algorithm but requires the application of expert judgement. A rigid and rushed local plan process runs the risk of losing fine judgement and thus making poorly informed decisions on the development of land.

Given that the intention is for the 'in principle' decisions to be made at local plan stage, with limited opportunity for scrutiny or change at the detailed application stage, the limitations of the evidence available to LPAs at local plan must be acknowledged. In particular, the mapped ecological information that is available is insufficient to make binding decisions about the principle of developing sites. The ecological complexities of individual sites will be missed if site surveys are not required before determining areas of development. Even if surveys were carried out at this stage, due to time lag between zoning and implementation, the ecological data underpinning the zoning decision is likely to be inaccurate and out of date by the time the development is built (an example of this is at Lodge Hill in Kent where an allocated site had to be de-allocated because by the time the planning application was made its ecological interest was worthy of SSSI designation). This reversal in the light of new evidence would not be possible under the new planning system proposed.

The consultation promotes an open-data approach. While on the surface this could be viewed as a good, transparent approach, the experience of the Wildlife Trusts is that making all ecological data open is likely to result in a reduction in data availability (particularly for protected species), and the erosion of data quality (particularly in cases where local data is not comparable at the national level).

We would make the following detailed comments:

Stage 1

A call for sites takes much longer than six months to organise and then assess the sites that are submitted. Rushing at this stage can lead to future problems. It is also unclear on how the public would engage at this stage. Is it simply for people to say how they would like to engage in plan making rather than help to shape the plan itself with their aspirations for their local area? Proper engagement with local people would take minimum of a year and should be supported by trained facilitators and additional resources.

Stage 2

The target time of 12 months overlooks how complex and often conflicted evidence gathering can be, especially where there is no opportunity to supplement it at the detailed application stage.

Stage 3

Consultation on submission makes it too late to make meaningful responses. As the plan will have been submitted it will not be possible for the LPA to amend it in response to comments received. It is not clear who will manage the consultation. Will it be PINS or the LPA?

Stage 4

The intention for an examination to last 9 months is admirable, however, PINS will need to be adequately resourced for this to happen. Will there be consultation on any modifications to the plan?

Stage 5

The 6-week period proposed would be adequate.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

The consultation is unclear on the future role of Neighbourhood Plans. We think that Neighbourhood Plans should be allowed to identify land for new purposes including community facilities, green spaces and affordable housing. If Neighbourhood Planning Groups were restricted to producing design codes it would not play to the strengths of the qualifying bodies, who have built up considerable expertise in planning for their neighbourhoods since Neighbourhood Plans were introduced by the Government in 2011.

Neighbourhood Planning groups are in the best position at a local level to balance the competing demands for development and protection that good place making entails. They are also in the best position to identify what features and facilities make their places special and unique and Neighbourhood Plans need the ability to protect and enhance these characteristics. This goes beyond the remit of a design code.

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?

The assumption that design and digital tools are the only remit of Neighbourhood Plans is very worrying. The experience of the last 8 years has shown that Neighbourhood Planning groups are very good at engaging the public, building the capacity of communities to engage with the planning system and identifying what is special about the area and valued by its residents. Whilst the experience of Neighbourhood Plans allocating market housing has been mixed, they are very good at promoting affordable housing schemes and allocating land for other uses such as community buildings, local green spaces, community orchards and allotments etc. These successes should not be lost in the new system. Similarly, whilst design codes will mostly be beyond the skill sets of Neighbourhood Planning groups, they are experts in their own local areas and could produce the character assessments that would inform these codes.

The short timescale proposed for the new plans will have a major adverse impact on the ability of parishes to meaningfully engage in plan-making. Neighbourhood Planning should be supported with funded facilitators and access to design and other experts to allow them to harness local skills and ambitions to inform the plan-making stage.

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, we agree that there should be a stronger emphasis on the build out of developments. However, very little is set out in the White Paper to address this. We propose enacting the recommendations from the Letwin review into Build Out Rates and taking measures to tackle land banking by developers. Whilst LPAs can, and should, progress local plans and planning applications quickly they do not control any levers when it comes to building out developments and implementing planning permissions. One solution is to charge council tax or some sort of vacant land tax on all new homes that are granted detailed planning permission. The land value rises as soon as permission is granted so it seems reasonable that some betterment should accrue from that point.

15. What do you think about the design of new development that has happened recently in your area?

Many developments in the High Weald have been poorly designed, often with no consideration to the context or the local landscape character other than superficial details of materials etc. The same design of new housing estates can be seen wherever you are in the country.

We applaud the white paper focus on building beautiful places. The poor design and quality of new development is a failure of the planning system as a whole. However, the answer is not less planning, but more and better. Planning departments should be strengthened and respected, with multidisciplinary teams the norm, having access to urban designers, spatial analysts, community facilitators and experts in landscape and the environment.

We agree that the planning process should result in 'net gains for the quality of our built and natural environments' but in the absence of any systematic and measurable assessment of gain, we rely on the good judgement of planning departments and they should be supported and strengthened to fulfil this role.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

Sustainability is a holistic concept and it should not be a case of identifying one priority over another. The climate and biodiversity crises are of equal immensity and concern, and it is extremely worrying that neither are mentioned in this consultation.

The White Paper has been written without reference to the biodiversity emergency and does not align with either existing or emerging environmental legislation. The Environment Bill is progressing through its final parliamentary stages and will make several significant environmental landmarks into law including biodiversity net gain, nature recovery networks and local nature recovery strategies. These need to be addressed in the new planning system along with measures in existing legislation such as the duty of local authorities and Government departments to have regard to the purposes of conserving biodiversity in the Natural Environment and Rural Communities Act (NERC). Clarification is required on the future of Habitat Regulation Assessment (HRA), which is not mentioned in the White Paper. The HRA ensures that adverse impacts do not occur on some of our most important and

cherished nature designations sites. The new simplified process needs to integrate HRA and in particular retain the precautionary principle and compensatory habitats.

The White Paper has also been written without reference to the climate change emergency. Although the importance of addressing climate change is stated at a high level within the document, no tangible measures are set out and the whole document seems to be about speeding up the delivery of housebuilding at the expense of anything else.

A target of 300,000 new homes pa will inevitably result in large greenfield developments, permanently sterilising huge areas of soil and compromising soil carbon storage. We would expect carbon budgets, including impact on soil carbon, to be produced for all proposed developments at the plan making stage.

17. Do you agree with our proposals for improving the production and use of design guides and codes?

No. We welcome the emphasis that the White Paper places on good design and the creation of beautiful places. We acknowledge that design guides can increase the quality of places delivered and have recently published a High Weald Housing Design Guide which helps developers to create housing developments that are landscape-led and distinctive to the High Weald. However, we do question whether prescriptive Design Codes allow truly innovative design to come forward that speaks to the landscape in which it is located. The type of 'pattern book' that developers have been using for their house types is part of the problem which has led to the generic housing estates referred to in answer to Qu 15.

The focus on design codes suggests that references to beauty in the document relate solely to visual amenity. We would expect to see any design code document relating to beauty to describe the breadth and depth of aesthetic experience that beautiful places encompass, including the opportunities for bird song and tranquillity, and beneficial kinaesthetic movement in nature.

Design codes will not of themselves deliver better quality or avoid ugly buildings as claimed by the report. Experience in the High Weald of applying local authority design guidelines and the High Weald Housing Design Guide illustrates how volume housebuilders are adept at applying a superficial 'pick and mix' approach to design. Typically, they offer minor surface changes in detailing to their stock building types without thought for more fundamental design issues such as site layout, the relationship between buildings and spaces, function and opportunities for using local materials. Scrutiny by independent designers will be essential to improve design standards. An understanding of local landscape and building character, and sensitive interpretation of design codes in this context will require expert input and enforcement at the point of application and implementation.

The white paper gives equal weight in the preparation of design codes to what is locally popular and what is characteristic. What is popular is an overly simplistic aim and open to undue influence. In our view the empirical evidence required to demonstrate popularity should be evidence from a socially just participative engagement process, rather than a simple poll.

18. 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?

A national design body will be necessary to compensate for the skills gap as there are currently very few people with an expertise in writing design codes. Requiring a chief officer in each LPA for design and place-making will only be effective if you also require that they have the appropriate qualifications (i.e. as a chartered Town Planner, Architect or Urban Designer). Otherwise existing post-holders will just have their job titles changed. It should also be a requirement that these chief officers sit on the management team of their local authorities so they have a real influence over corporate decisions.

20. Do you agree with our proposals for implementing a fast-track for beauty?

No, beauty should be the norm not the exception and the White Paper proposals are already speeding up the decision-making process to the point that endangers robust decision-making. Good design is a product of careful work by multi-discipline experts informed by genuine community engagement. It is not a fast process.

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, we need to significantly increase the amount of affordable housing delivered in this country generally but particularly in protected landscapes where local people, especially those in the land-based sector, have been priced out of the market.

Measures to support rural exception sites and community housing initiatives should be strengthened in these areas and additional support provided.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

No. The only restriction on CIL spending is that it must be on infrastructure, and this should also be true for the Infrastructure Levy. Services should be paid for through the precept. The 25% neighbourhood share should be passported straight through to Parish Councils in parished areas regardless of whether they have a neighbourhood plan in place, and in unparished areas there should be procedures in place for local people to decide how their neighbourhood share is to be spent. Many neighbourhood planning groups have been denied access to this funding because their local authorities have not adopted CIL charging schedules and we need to re-establish the link between development and community benefits on the 'who takes the pain gets the gain' principle.

25(a). If yes, should an affordable housing 'ring-fence' be developed?

Yes, because there will be pressure on local authorities to deliver things like roads and schools for the existing population and the voice of those who need affordable housing is often lost. This already happens when viability issues force communities to choose between the delivery of affordable housing and the delivery of infrastructure, usually to the detriment of the former.

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?

Yes, older people may be left behind by the digital proposals. Also, whilst not a protected characteristic under the Equalities Act, the impact on rural communities with poor or no broadband should also be considered.

The short timescale for consultation will also adversely affect the ability of these groups to source information and seek assistance to help them respond.