

**NOTICE OF DECISION OF LEADER**

Pursuant Section 15(4) of the Local Government Act 2000, as amended by section 63 of the Local Government and Public Involvement in Health Act 2007, the senior executive member may discharge any of the functions that are the responsibility of the Cabinet or may arrange for them to be discharged by another member of the Cabinet or Officer. On 1<sup>st</sup> December 2010, the Council adopted the Strong Leader Model for Corporate Governance 2011 as required under Part 3 of The Local Government and Public Involvement in Health Act 2007 (The 2007 Act).

In accordance with the authority delegated to me, I have made the following decision:

Subject	Decision	Reason for decision	Date for Decision to be taken
Response to planning consultation document	To approve the response to the governments recent consultation on the National Planning Policy Framework and Developer Contributions	The consultation will amend current planning policy and how Local Authorities can utilise s106 monies and may place an additional burden on officers so the Council should respond to the proposed amendments.	

**I confirm that the appropriate statutory officer consultation has taken place with regard to this decision.**

Dated:

*2nd May, 2018*

Signed:

*M J HART*

Councillor:

*Marcus J. HART*

Leader

## WYRE FOREST DISTRICT COUNCIL

### Strong Leader Report

## **Response to Government consultation on the National Planning Policy Framework including Developer Contributions**

<b>OPEN</b>	
<b>DIRECTOR:</b>	Mike Parker
<b>CONTACT OFFICER:</b>	Kate Bailey
<b>APPENDICES:</b>	1. Developer contribution questionnaire 2. Affordable Housing definitions 3. NPPF questionnaire

### **1. PURPOSE OF REPORT**

This report is to agree the consultation responses for the new National Planning Policy Framework and the Supporting Housing through Developer Contributions consultation.

### **2. RECOMMENDATION**

That the consultation responses shown in Appendices One and Three are approved.

### **3. BACKGROUND**

3.1 The Government published the various consultation papers in March 2018, following on from the “Planning for the right homes in the right places” consultation in Autumn 2017. Included in the current consultation are the new National Planning Policy Framework and associated papers as well as a “Supporting Housing through Developer Contributions”. The consultation ends on 10<sup>th</sup> May and so Officers are requesting a strong leader decision is taken to enable us to meet the deadlines for consultation returns.

3.2 The consultation on Developer Contributions looks at proposed reforms to the system of developer contributions made by way of s106 Agreements or CIL. Other reforms, including in relation to viability, are covered by the National Planning Policy Framework (NPPF) consultation, published alongside the Developer Contributions document

3.3 As expected the definition of “affordable housing” has been amended to now include starter homes and homes built to rent (please see Appendix Two).

### **4. KEY ISSUES**

4.1 The Developer Contributions consultation is mainly concerned with changes to the Community Infrastructure Levy (CIL) including making it easier to introduce and clarifying the exemptions and indexation. However, at present it appears Wyre Forest is unlikely to introduce a CIL due to viability issues (this position will be developed and

clarified alongside Local Plan review work) and can't introduce a Strategic Infrastructure Tariff as the Council isn't part of the Combined Authority.

- 4.2 To address the issues highlighted above, in summary, the Developer Contribution paper proposes:
- 4.2.1 **Reducing complexity and increasing certainty** for local authorities and developers, which will give confidence to communities that infrastructure can be funded.
  - 4.2.2 Supporting **swifter development** through focusing viability assessment on plan making rather than decision making (when planning applications are submitted). This speeds up the planning process by reducing scope for delays caused by renegotiation of developer contributions.
  - 4.2.3 **Increasing market responsiveness** so that local authorities can better target increases in value, while reducing the risks for developers in an economic downturn.
  - 4.2.4 **Improving transparency** for communities and developers over where contributions are spent and expecting all viability assessments to be publicly available subject to some very limited circumstances. This will **increase accountability** and confidence that sufficient infrastructure will be provided.
  - 4.2.5 Allowing local authorities to **introduce a Strategic Infrastructure Tariff** (in the Combined Authority) to help fund or mitigate strategic infrastructure, ensuring existing and new communities can benefit.

### **Proposed Response – (see Appendix 1)**

- 4.3 Viability at the plan making stage and therefore reducing the requirement for viability to be carried out on a site by site basis is welcome. This should speed up the development process but it would be useful to have a standardised method for viability testing at both plan making and application stage.
- 4.4 Local communities don't always know how s106 contributions are negotiated or where s106 funding is spent and so the government are seeking greater transparency in the publication of both the viability assessments and the collection and spend of contributions received and this is supported.
- 4.5 Developers can seek to renegotiate contributions if they believe they will make sites unviable but where a development is built out over a long period of time it is difficult for the Local Authority to benefit from any uplift in house prices etc which would mean a greater level of affordable housing or other s106 contribution is paid. The NPPF and Planning Guidance allows for amendments to be made to contributions (positive and negative) where the policies allow for it.
- 4.6 Regulation 123 of the CIL regulations prevents local authorities from using more than five s106 planning obligations to fund a single infrastructure project. This may have created problems for Wyre Forest District Council in that specific projects have to be identified (rather than just e.g. a particular park) when the s106 agreement is entered into with no certainty as to when the monies will be received, as this depends on when the development trigger points are met as this depends on when the development triggers are met. This may result in projects being delayed. In addition, there is the possibility that 5 obligations will not be enough to deliver a project and therefore we may end up in a situation where monies have to be repaid because the project can't be completed. Under the proposed changes Local Authorities with CIL can lift the pooling restrictions but for those like Wyre Forest, where it is not feasible to charge CIL, as the amount forecast to be raised would not justify operating the costs of the system, or because it is considered that the viability impact of even a

low CIL alongside section 106 planning obligations outweighs the desirability of funding the required infrastructure from CIL, it would be beneficial to still lift the pooling restrictions. However this would only be permitted where authorities fall under a threshold based on the tenth percentile of average new build house prices, meaning CIL cannot feasibly be charged but this isn't likely to apply in Wyre Forest. Officers would support an alternative assessment such as viability testing is undertaken at plan-making stage and can demonstrate that CIL isn't affordable to determine whether pooling restrictions could be lifted.

- 4.7 The consultation proposes to amend the CIL Regulations to require the publication of Infrastructure Funding Statements that explain how the spending of any forecasted income from both CIL and section 106 planning obligations over the next five years will be prioritised and to monitor funds received and their use.
- 4.8 In the NPPF and PPG there are more details around the standardised methodology for assessing housing needs (Appendix 3). Whilst it is proposed that the Council will be given a figure, what will be less clear is what will then be the requirement for type and tenure and will mean a Strategic Housing Market Assessment will still be required to determine the need for affordable housing along with other specialist housing types (e.g. older people, families, students, self build etc).
- 4.9 The new Build To Rent product does not need to be managed by a Registered Provider but does have aspects that would require regulation e.g. eligibility criteria, rent levels, management agreement etc and it is proposed that this happens through the s106 agreement. The Council would therefore have the unofficial role of regulator.
- 4.10 The NPPF states that no affordable housing contribution should be sought on sites below 11 units unless they are in designated rural areas. Officers would support the view of Rural Services Network that Councils should determine affordable housing thresholds in rural parishes to ensure an adequate mix of tenure in these areas.

## **5. FINANCIAL IMPLICATIONS**

- 5.1 The requirement to publish Infrastructure Funding Statements may place an additional burden on officers. The government have therefore asked whether Local Authorities views on charging a sum for monitoring planning obligations as part of the s106 in a similar way to charging for administration within CIL. Officers are supportive of this approach as currently the courts have said that this is not possible.

## **6. LEGAL AND POLICY IMPLICATIONS**

- 6.1 The NPPF and Planning Policy Guidance will require the Local Authority to update its planning policies as it moves through the Local Plan Review process to ensure compliance.

## **7. EQUALITY IMPACT NEEDS ASSESSMENT**

- 7.1 Not applicable.

## **8. RISK MANAGEMENT**

- 8.1 There is a risk that the provision of affordable housing will be reduced through the widening definition, the removal in some instances of the requirement for housing to be affordable in perpetuity.
- 8.2 If the pooling restrictions remain then the Council will continue to have the situation where larger, more expensive infrastructure requirements can't be fully met through s106 funding.

## 9. **CONCLUSION**

- 9.1 As some of the questions impact on the financial position of the Council, it is considered that a response should be sent to the consultation on the basis set out in this report.
- 9.2 Officer are keen to support greater flexibility and transparency in the use of s106 monies but want to ensure it remains in place where it isn't viable to charge CIL..

## 10. **CONSULTEES**

- 10.1 CLT, Spatial Planning Manager, Principal Solicitor and Development Manager

## 11. **BACKGROUND PAPERS**

- 11.1 None.

# Developer Contributions Consultation response form

If you are responding by email or in writing, please reply using this questionnaire proforma, which should be read alongside the consultation document. You are able to expand the comments box should you need more space. Required fields are indicated with an asterisk (\*)

This form should be returned to  
[developercontributionsconsultation@communities.gsi.gov.uk](mailto:developercontributionsconsultation@communities.gsi.gov.uk)

Or posted to:

Planning and Infrastructure Division  
Ministry of Housing, Communities and Local Government  
2nd floor, South East  
Fry Building  
2 Marsham Street  
LONDON  
SW1P 4DF

**By 10 May 2018**

## Your details

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Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?\*

### **Organisational response**

If you are responding on behalf of an organisation, please select the option which best describes your organisation.\*

**Local authority (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)**

If you selected other, please state the type of organisation

Click here to enter text.

Please provide the name of the organisation (if applicable)

Wyre Forest District Council

## Reducing Complexity and Increasing Certainty

### Question 1

Do you agree with the Governments' proposals to set out that:

- i. Evidence of local infrastructure need for CIL-setting purposes can be the same infrastructure planning and viability evidence produced for plan making?

Yes

- ii. Evidence of a funding gap significantly greater than anticipated CIL income is likely to be sufficient as evidence of infrastructure need?

Yes

iii. Where charging authorities consider there may have been significant changes in market conditions since evidence was produced, it may be appropriate for charging authorities to take a pragmatic approach to supplementing this information as part of setting CIL – for instance, assessing recent economic and development trends and working with developers (e.g. through local development forums), rather than procuring new and costly evidence?

Yes

### Question 2

Are there any factors that the Government should take into account when implementing proposals to align the evidence for CIL charging schedules and plan making?

Click here to enter text.

## Ensuring that consultation is proportionate

### Question 3

Do you agree with the Government's proposal to replace the current statutory consultation requirements with a requirement on the charging authority to publish a statement on how it has sought an appropriate level of engagement?

Yes

### Question 4

Do you have views on how guidance can ensure that consultation is proportionate to the scale of any charge being introduced or amended?

## Removing unnecessary barriers: the pooling restriction

### Question 5

Do you agree with the Government's proposal to allow local authorities to pool section 106 planning obligations:

- i. Where it would not be feasible for the authority to adopt CIL in addition to securing the necessary developer contributions through section 106?

Yes

- ii. Where significant development is planned on several large strategic sites?

Yes

### Question 6

- i. Do you agree that, if the pooling restriction is to be lifted where it would not be feasible for the authority to adopt CIL in addition to securing the necessary developer contributions through section 106, this should be measures based on the tenth percentile of average new build house prices?

No



- ii. What comments, if any, do you have on how the restriction is lifted in areas where CIL is not feasible, or in national parks?

It should be lifted where the viability testing undertaken during plan making stage shows that it isn't viable to do so because there will be many Authorities with house prices above the 10th centile but where CIL still isn't viable especially on brownfield sites or sites requiring other major infrastructure works.

### Question 7

Do you believe that, if lifting the pooling restriction where significant development is planned on several large strategic sites, this should be based on either:

- i. a set percentage of homes, set out in a plan, are being delivered through a limited number of strategic sites; or

No comment

- ii. all planning obligations from a strategic site count as one planning obligation?

No comment

### Question 8

What factors should the Government take into account when defining 'strategic sites' for the purposes of lifting the pooling restriction?

No comment

### Question 9

What further comments, if any, do you have on how pooling restrictions should be lifted?

No comment

## Improvements to the operation of CIL

### Question 10

Do you agree with the Government's proposal to introduce a 2 month grace period for developers to submit a Commencement Notice in relation to exempted development?

Yes

### Question 11

If introducing a grace period, what other factors, such as a small penalty for submitting a Commencement Notice during the grace period, should the Government take into account?

No comment

### Question 12

How else can the Government seek to take a more proportionate approach to administering exemptions?

No comment

### Question 13

Do you agree that Government should amend regulations so that they allow a development originally permitted before CIL came into force, to balance CIL liabilities between different phases of the same development?

Yes

### Question 14

Are there any particular factors the Government should take into account in allowing abatement for phased planning permissions secured before introduction of CIL?

Click here to enter text.

### Question 15

Do you agree that Government should amend regulations on how indexation applies to development that is both originally permitted and then amended while CIL is in force to align with the approach taken in the recently amended CIL regulations?

**Yes**

## Increasing market responsiveness

### Question 16

Do you agree with the Government's proposal to allow local authorities to set differential CIL rates based on the existing use of land?

**Yes**

### Question 17

If implementing this proposal do you agree that the Government should:

- i. encourage authorities to set a single CIL rate for strategic sites?

**Yes**

- ii. for sites with multiple existing uses, set out that CIL liabilities should be calculated on the basis of the majority existing use for small sites? Yes/No

**No**

- iii. set out that, for other sites, CIL liabilities should be calculated on the basis of the majority existing use where 80% or more of the site is in a single existing use?

**No**

- iv. What comments, if any, do you have on using a threshold of 80% or more of a site being in a single existing use, to determine where CIL liabilities should be calculated on the basis of the majority existing use?

Click here to enter text.

### **Question 18**

What further comments, if any, do you have on how CIL should operate on sites with multiple existing uses, including the avoidance of gaming?

No comment

### **Indexing CIL rates to house prices**

#### **Question 19**

Do you have a preference that CIL rates for residential development being indexed to either:

- a) The change in seasonally adjusted regional house price indexation on a monthly or quarterly basis; OR

**No**

- b) The change in local authority-level house price indexation on an annual basis

**Yes**

#### **Question 20**

Do you agree with the Government's proposal to index CIL to a different metric for non-residential development?

**Yes**

### Question 21

If yes, do you believe that indexation for non-residential development should be based on:

- i. the Consumer Price Index? OR

**No**

- ii. a combined proportion of the House Price Index and Consumer Prices Index?

**Yes**

### Question 22

What alternative regularly updated, robust, nationally applied and publicly available data could be used to index CIL for non-residential development?

No comment

### Question 23

Do you have any further comments on how the way in which CIL is indexed can be made more market responsive?

No comment

## Improving transparency and increasing accountability

### Question 24

Do you agree with the Government's proposal to?

- i. remove the restrictions in regulation 123, and regulation 123 lists?

**Yes**

- ii. introduce a requirement for local authorities to provide an annual Infrastructure Funding Statement?

**Yes**

### **Question 25**

What details should the Government require or encourage Infrastructure Funding Statements to include?

Click here to enter text.

### **Question 26**

What views do you have on whether local planning authorities may need to seek a sum as part of Section 106 planning obligations for monitoring planning obligations? Any views on potential impacts would also be welcomed.

This would be useful as it will involve additional work by Planning Officer.

## **A Strategic Infrastructure Tariff (SIT)**

### **Question 27**

Do you agree that Combined Authorities and Joint Committees with strategic planning powers should be given the ability to charge a SIT?

**Please select an answer from this drop down menu**

### **Question 28**

Do you agree with the proposed definition of strategic infrastructure?

**Please select an answer from this drop down menu**

### **Question 29**

Do you have any further comments on the definition of strategic infrastructure?

Click here to enter text.

**Question 30**

Do you agree that a proportion of funding raised through SIT could be used to fund local infrastructure priorities that mitigate the impacts of strategic infrastructure?

Please select an answer from this drop down menu

**Question 31**

If so, what proportion of the funding raised through SIT do you think should be spent on local infrastructure priorities?

Click here to enter text.

**Question 32**

Do you agree that the SIT should be collected by local authorities on behalf of the SIT charging authority?

Please select an answer from this drop down menu

**Question 33**

Do you agree that the local authority should be able to keep up to 4% of the SIT receipts to cover the administrative costs of collecting the SIT?

Please select an answer from this drop down menu

## Technical clarifications

**Question 34**

Do you have any comments on the other technical clarifications to CIL?

No comment

## Appendix Two: Affordable Housing Definitions

**Affordable housing:** housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute at the time of plan-preparation or decision-making. Income restrictions should be used to limit a household's eligibility to purchase a starter home to those who have maximum household incomes of £80,000 a year or less (or £90,000 a year or less in Greater London)

c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.



# Consultation response form

This is the response form for the consultation on the draft revised National Planning Policy Framework. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (\*)

## Your details

First name*	Kate
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Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?\*

## Organisational response

If you are responding on behalf of an organisation, please select the option which best describes your organisation. \*

### Local authority (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)

If you selected other, please state the type of organisation

Please provide the name of the organisation (if applicable)

## Chapter 1: Introduction

### Question 1

Do you have any comments on the text of Chapter 1?

No comment

## Chapter 2: Achieving sustainable development

### Question 2

Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

### Question 3

Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

**Yes**

Please enter your comments here

[Click here to enter text.](#)

### Question 4

Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

No comment

## Chapter 3: Plan-making

### Question 5

Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

**Yes**

Please enter your comments here

[Click here to enter text.](#)

### **Question 6**

Do you have any other comments on the text of chapter 3?

No comment

## **Chapter 4: Decision-making**

### **Question 7**

The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

**Not sure**

Please enter your comments here

[Click here to enter text.](#)

### **Question 8**

Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

**Yes**

Please enter your comments here:

[Click here to enter text.](#)

### **Question 9**

What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

Please enter your comments below

This would useful to capture significant changes over time

### **Question 10**

Do you have any comments on the text of Chapter 4?

No comment

## Chapter 5: Delivering a wide choice of high quality homes

### Question 11

What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?

Please enter your comments here

No comment

### Question 12

Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

No

Please enter your comments here

The market dictates the rate of delivery and providing sufficient sites are allocated the Local Authority and it's residents shouldn't be penalised for market failure.

### Question 13

Do you agree with the new policy on exception sites for entry-level homes?

No

Please enter your comments here

These will be included through usual affordable housing contributions on sites and therefore an exception site isn't required.

### Question 14

Do you have any other comments on the text of Chapter 5?

Local Authorities should be allowed to determine their own levels of affordable housing contribution and particularly in areas of housing need that aren't necessarily designated rural areas. We would support the Rural Support Network response.

## Chapter 6: Building a strong, competitive economy

### Question 15

Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

### **Question 16**

Do you have any other comments on the text of chapter 6?

No comment

## **Chapter 7: Ensuring the vitality of town centres**

### **Question 17**

Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

### **Question 18**

Do you have any other comments on the text of Chapter 7?

No comment

## **Chapter 8: Promoting healthy and safe communities**

### **Question 19**

Do you have any comments on the new policies in Chapter 8 that have not already been consulted on?

No comment

### **Question 20**

Do you have any other comments on the text of Chapter 8?

No comment

## Chapter 9: Promoting sustainable transport

### Question 21

Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

### Question 22

Do you agree with the policy change that recognises the importance of general aviation facilities?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

### Question 23

Do you have any other comments on the text of Chapter 9?

No comment

## Chapter 10: Supporting high quality communications

### Question 24

Do you have any comments on the text of Chapter 10?

No comment

## Chapter 11: Making effective use of land

### Question 25

Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

**Yes**

Please enter your comments here

[Click here to enter text.](#)

### **Question 26**

Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

**Yes**

Please enter your comments here

[Click here to enter text.](#)

### **Question 27**

Do you have any other comments on the text of Chapter 11?

No comment

## Chapter 12 : Achieving well-designed places

### **Question 28**

Do you have any comments on the changes of policy in Chapter 12 that have not already been consulted on?

No comment

### **Question 29**

Do you have any other comments on the text of Chapter 12?

No comment

## Chapter 13: Protecting the Green Belt

### **Question 30**

Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt, and to provide for the other forms of development that are 'not inappropriate' in the Green Belt?

**Yes**

Please enter your comments here

No comment

### Question 31

Do you have any other comments on the text of Chapter 13?

No comment

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

### Question 32

Do you have any comments on the text of Chapter 14?

No comment

### Question 33

Does paragraph 149b need any further amendment to reflect the ambitions in the Clean Growth Strategy to reduce emissions from building?

Please select an item from this drop down menu

No comment

Chapter 15: Conserving and enhancing the natural environment

### Question 34

Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

Yes

Please enter your comments here

No comment

### Question 35

Do you have any other comments on the text of Chapter 15?

No comment



## Chapter 16: Conserving and enhancing the historic environment

### Question 36

Do you have any comments on the text of Chapter 16?

No comment

## Chapter 17: Facilitating the sustainable use of minerals

### Question 37

Do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text in this chapter?

No comment

### Question 38

Do you think that planning policy in minerals would be better contained in a separate document?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

### Question 39

Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

## Transitional arrangements and consequential changes

### Question 40

Do you agree with the proposed transitional arrangements?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

### **Question 41**

Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

### **Question 42**

Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

**Please select an item from this drop down menu**

Please enter your comments here

No comment

## **Glossary**

### **Question 43**

Do you have any comments on the glossary?

Starter homes shouldn't be viewed as an affordable housing product unless they can become affordable in perpetuity. Build to Rent homes should be regulated like other affordable housing rented products e.g the Regulator and not by Local Authorities.