

REPORT TO: Environment and Urban Renewal Policy and Performance Board

DATE: 30th September 2020

REPORTING OFFICER: Strategic Director – Enterprise, Community and Resources

PORTFOLIO: Physical Environment

SUBJECT: Planning White Paper

WARDS: Borough wide

1.0 PURPOSE OF THE REPORT

- 1.1 To inform the Board about the recently published (6 August 20) Planning White Paper consultation and the potential implications this could have for development in Halton. The consultation is open until 29 October 2020. The White Paper can be found online here:

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

2.0 RECOMMENDATION: That

(1) The Board notes the report; and

(2) Consideration is given to the proposals, together with any response the Board may wish to provide to the consultation.

3.0 SUPPORTING INFORMATION

- 3.1 The Government has announced significant changes to the planning system in recent months with various changes to the Use Class Order and Permitted Development Rights, and the Prime Minister's announcement to 'Build, Build, Build'. These changes are intended to significantly increase the number of new homes built, a move to 'beauty' in development and streamlining and modernising the planning process.
- 3.2 Recent announcements have now been expanded and formalised within proposals set out in the Planning White Paper 'Planning for the Future'. The Planning Paper sets out the most radical changes to the Planning System since it was introduced in the immediate period after the Second World War.

4.0 POLICY IMPLICATIONS

- 4.1 The Planning White Paper 'Planning for the Future' was published on 6 August 2020. It has been heralded by many as the most radical reform of the planning system in England since the establishment of the current

system. Probably the key driver of the proposed reforms is the need to deliver, as a nation, 300,000 new homes per year.

- 4.2 The proposals are set out under a number of 'pillars' with each having a number of specific proposals. The pillars for change are:
- Planning for development
 - Planning for beautiful and sustainable places
 - Planning for Infrastructure and connected places
- 4.3 The remainder of this report will set out each of the 24 detailed proposals as set out in the White Paper with an explanation of each. An initial response to the proposals is provided at Annex A.

Proposal 1: The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected.

- 4.4 The term 'substantial' has not yet been defined but it is considered that growth areas will be new settlement and urban extension areas but also large urban regeneration areas. Sites annotated in the new Local Plan as growth areas would have automatic outline planning permissions (see proposal 5). Areas of flood risk and other land with important constraints, would be excluded unless the risk can be fully mitigated.
- 4.5 Renewal areas will cover existing built-up areas where smaller scale development is appropriate. It could include the 'gentle densification' and infill of residential areas, development in Town Centres and small sites within or on the edge of a village. There would be statutory presumption in favour of development being granted for the uses specified as being suitable in each area.
- 4.6 Protected Areas would include sites and areas which, as a result of their environmental and/or cultural characteristics, would justify more stringent development controls to ensure sustainability. This would include areas such as Green Belt, Conservation Areas, Local Wildlife Sites, areas of significant flood risk and important areas of green space. At a smaller scale it can continue to include gardens in line with existing policy in the National Planning Policy Framework.

Proposal 2: Development management policies established at national scale and an altered role for Local Plans.

- 4.7 Development management policies contained in Local Plans would be restricted to clear and necessary site or area-specific requirements, including broad height limits, scale and/or density limits for land included in Growth areas and Renewal areas, established through the accompanying text. The National Planning Policy Framework would become the primary source of policies for development management;

there would be no provision for the inclusion of generic development management policies that simply repeat national policy within Local Plans.

Proposal 3: Local Plans should be subject to a single statutory “sustainable development” test, replacing the existing tests of soundness.

4.8 This would consider whether the plan contributes to achieving sustainable development in accordance with policy issued by the Secretary of State. Specifically:

- It is proposed to abolish the Sustainability Appraisal system and develop a simplified process for assessing the environmental impact of plans
- the Duty to Cooperate test would be removed
- a slimmed down assessment of deliverability for the plan would be incorporated into the “sustainable development” test
- Plans should be informed by appropriate infrastructure planning, and sites should not be included in the plan where there is no reasonable prospect of any infrastructure that may be needed coming forward within the plan period

Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.

4.9 Local Plans will need to identify areas to meet a range of development needs – such as homes, businesses and community facilities – for a minimum period of 10 years.

4.10 It is proposed that the standard method would be a means of distributing the national housebuilding target of 300,000 new homes annually, and one million homes by the end of the Parliament, having regard to:

- the size of existing urban settlements (so that development is targeted at areas that can absorb the level of housing proposed);
- the relative affordability of places (so that the least affordable places where historic under-supply has been most chronic take a greater share of future development);
- the extent of land constraints in an area to ensure that the requirement figure takes into account the practical limitations that some areas might face, including the presence of designated areas of environmental and heritage value, the Green Belt and flood risk;
- the opportunities to better use existing brownfield land for housing, including through greater densification. The requirement

figure will expect these opportunities to have been utilised fully before land constraints are taken into account;

- the need to make an allowance for land required for other (non-residential) development; and
- inclusion of an appropriate buffer to ensure enough land is provided to account for the drop off rate between permissions and completions as well as offering sufficient choice to the market.

4.11 The proposed method for calculating the housing requirement taking account of all the factors above has not yet been published. The current 'standard methodology' is subject to a proposed revision but this does not factor in all the points above. The government, however, is confident that the proposed approach would make sure enough land is identified for new housing and therefore proposes that a five year supply of housing land is no longer needed to be demonstrated, although the Housing Delivery Test would remain.

Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.

4.12 In areas suitable for substantial development (Growth areas) an outline permission for the principle of development would be confirmed on adoption of the Local Plan. 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.

4.13 Detailed planning permission could be secured in one of three ways:

- a reformed reserved matters process for agreeing the issues which remain outstanding;
- a Local Development Order prepared by the local planning authority for the development which could be prepared in parallel with the Local Plan and be linked to a master plan and design codes; or
- for exceptionally large sites a Development Consent Order under the Nationally Significant Infrastructure Projects regime

4.14 In areas suitable for development (Renewal areas), there would be a general presumption in favour of development established in legislation (achieved by strengthening the emphasis on taking a plan-led approach, with plans reflecting the general appropriateness of these areas for development). Consent for development would be granted in one of three ways:

- for pre-specified forms of development such as the redevelopment of certain building types, through a new permission route which gives an automatic consent if the scheme meets design and other prior approval requirements (as

discussed further under the fast-track to beauty proposals set out under Pillar Two);

- 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, for what development the area or site is appropriate for, and with reference to the National Planning Policy Framework; or
- a Local or Neighbourhood Development Order.

4.15 In both the Growth and Renewal areas it would still be possible for a proposal which is different to the plan to come forward (if, for example, local circumstances had changed suddenly, or an unanticipated opportunity arose), but this would require a specific planning application. It is expected that this is the exception rather than the rule.

4.16 In areas where development is restricted (Protected areas) any development proposals would come forward as now through planning applications being made to the local 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.

Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology

4.17 For all types of planning applications regardless of the category of land, the Government want to see a much more streamlined and digitally enabled end to end process which is proportionate to the scale and nature of the development proposed, to ensure decisions are made faster. The well-established time limits of eight or 13 weeks for determining an application from validation to decision should be a firm deadline – not an aspiration which can be got around through extensions of time as routinely happens now.

4.18 In order that this is achieved several proposals to standardise and digitise the processes are proposed. The Government believe there should be a clear incentive on the local planning authority to determine an application within the statutory time limits. This could involve the automatic refund of the planning fee for the application if they fail to determine it within the time limit. But they also want to explore whether some types of applications should be deemed to have been granted planning permission if there has not been a timely determination, to ensure targets are met and local authorities keep to the time limit in the majority of cases. A key issue here will be the ability of statutory and non-statutory consultees to provide comments within tight timeframes, allowing consultation to be undertaken, but also providing time for a LPA to take those comments into consideration and meet time limits.

4.19 There will remain the ability for applicants to appeal against a decision by a local planning authority. However, by ensuring greater certainty

about the principle of development in Local Plans, the Government expect to see fewer appeals being considered by the Planning Inspectorate. To promote proper consideration of applications by planning committees, where applications are refused, it is proposed that applicants will be entitled to an automatic rebate of their planning application fee if they are successful at appeal.

Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.

- 4.20 Interactive, map-based Local Plans will be built upon data standards and digital principles. To support local authorities in developing plans in this new format, the Government will publish a guide to the new Local Plan system and data standards and digital principles, including clearer expectations around the more limited evidence that will be expected to support “sustainable” Local Plans, accompanied by a “model” template for Local Plans and subsequent updates, well in advance of the legislation being brought into force.

Proposal 8: Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so.

- 4.21 It is proposed that the Local Plan process covers five stages, with meaningful public engagement at two stages:
- Stage 1 [6 months]: The local planning authority “calls for” suggestions for areas under the three ‘zoning’ categories
 - Stage 2 [12 months]: The local planning authority draws up its proposed Local Plan, and produces any necessary evidence to inform and justify the plan.
 - Stage 3 [6 weeks]: The local planning authority simultaneously (i) submits the Plan to the Secretary of State for Examination; and (ii) publicises the plan for the public to comment on. Responses will have a word count limit.
 - Stage 4 [9 months]: A planning inspector appointed by the Secretary of State considers whether the three categories shown in the proposed Local Plan are “sustainable” as per the statutory test and accompanying national guidance and makes binding changes which are necessary to satisfy the test.
 - Stage 5 [6 weeks]: Local Plan map, key and text are finalised, and come into force.
- 4.22 To support the transition to the new system, the Government propose a statutory duty for local authorities to adopt a new Local Plan by a specified date – either 30 months from the legislation being brought into force, or 42 months for local planning authorities who have adopted a Local Plan within the previous three years. This should be accompanied

by a requirement for each planning authority to review its Local Plan at least every five years. Reviews should be undertaken sooner than five years where there has been a significant change in circumstances. 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.

- 4.23 Alternative options for Local Plan production is the removal of examination stage altogether and requiring Local Authorities to undertake a self-assessment against a set of set criteria and guidance.

Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools

- 4.24 Neighbourhood Plans should be retained in the reformed planning system, but the Government want to consider whether their content should become more focused to reflect proposals for Local Plans, as well as the opportunities which digital tools and data offer to support their development and improve accessibility for users.

Proposal 10: A stronger emphasis on build out through planning

- 4.25 The Government propose to make it clear in the revised National Planning Policy Framework that the masterplans and design codes for sites prepared for substantial development should seek to include a variety of development types by different builders which allow more phases to come forward together. They will explore further options to support faster build out as we develop our proposals for the new planning system.

Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.

- 4.26 As national guidance, the Government will expect the National Design Guide, National Model Design Code and the revised Manual for Streets to have a direct bearing on the design of new communities. But to ensure that schemes reflect the diverse character of our country, as well as what is provably popular locally, it is important that local guides and codes are prepared wherever possible. These play the vital role of translating the basic characteristics of good places into what works locally, and can already be brought forward in a number of ways:
- by local planning authorities to supplement and add a visual dimension to their Local Plans;
 - through the work of neighbourhood planning groups;
 - or by applicants in bringing forward proposals for significant new areas of development.

- 4.27 It is proposed that these different routes for bringing forward design guides and codes should remain, although in all cases it will be essential that they are prepared with effective inputs from the local community, considering empirical evidence of what is popular and characteristic in the local area. To underpin the importance of this, the Government intend to make clear that designs and codes should only be given weight in the planning process if they can demonstrate that this input has been secured. And, where this is the case, it will also be made clear that decisions on design should be made in line with these documents. Where locally-produced guides and codes are not in place, the Government also propose to make clear in policy that the National Design Guide, National Model Design Code and Manual for Streets should guide decisions on the form of development.

Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.

- 4.28 The Government will explore the options for establishing a new expert body which can 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. They will also bring forward proposals later this year for improving the resourcing of planning departments more broadly; and their suggestions in this paper for streamlining plan-making will allow some re-focusing of professional skills. However, effective leadership within authorities will also be crucial. To drive a strong vision for what each place aspires to, and ensure this is integrated across council functions, the Government believe that each authority should appoint a chief officer for design and place-making, as recommended by the Building Better, Building Beautiful Commission.

Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.

- 4.29 This proposal doesn't have specific implications for Local Authorities except that Homes England would be expected to prioritise schemes (and hence funding opportunities) to schemes that promote 'beauty'.

Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.

- 4.30 In the first instance, through updating the National Planning Policy Framework, the Government will make clear that schemes which comply with local design guides and codes have a positive advantage and greater certainty about their prospects of swift approval.

- 4.31 Second, where plans identify areas for significant development (Growth areas), it will be legislated to 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. These masterplans and codes could be prepared by the local planning authority alongside or subsequent to preparing its plan, at a level of detail commensurate with the size of site and key principles to be established.
- 4.32 Third, it also proposed to legislate to widen and change the nature of permitted development, so that it enables popular and replicable forms of development to be approved easily and quickly, helping to support 'gentle intensification' of our towns and cities, but in accordance with important design principles. This could be through the use of 'pattern books' setting out what would be acceptable in areas identified for Renewal.

Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.

- 4.33 The Government want to provide important opportunities to strengthen the way that environmental issues are considered through the planning system. They also want the reforms to be clear about the role that local, spatially-specific policies can continue to play, such as in identifying important views, opportunities to improve public access or places where renewable energy or woodland and forestry creation could be accommodated.

Proposal 16: We intend to design 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.

- 4.34 The current frameworks assessing environmental impacts – which include Strategic Environmental Assessment, Sustainability Appraisal, and Environmental Impact Assessment – can lead to duplication of effort and overly-long reports which inhibit transparency and add unnecessary delays.
- 4.35 The government see this is an area that needs reforming to simplify the process, make information more accessible and easier to understand and avoid duplication. This will be the subject of a separate and more detailed consultation in the autumn.

Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century.

- 4.36 The government will review and update the planning framework for listed buildings and conservation areas, to ensure their significance is conserved while allowing, where appropriate, sympathetic changes to support their continued use and address climate change. In doing so, they want to explore whether there are new and better ways of securing consent for routine works, to enable local planning authorities to concentrate on conserving and enhancing the most important historic buildings. This includes exploring whether suitably experienced architectural specialists can have earned autonomy from routine listed building consents.

Proposal 18: To complement our planning reforms, we will facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.

- 4.37 The Planning White Paper acknowledges planning system is only one of the tools that we need to use to mitigate and adapt to climate change. Last year the government consulted on proposals to move towards a Future Homes Standard, which was a first step towards net zero homes. From 2025, they 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.

Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.

- 4.38 The government believe that the current system of planning obligations under Section 106 should be consolidated under a reformed, extended 'Infrastructure Levy'. This would be based upon a flat-rate, valued-based charge, set nationally, at either a single rate, or at area-specific rates. This would address issues in the current system as it would:

- be charged on the final value of a development;
- be levied at point of occupation, with prevention of occupation being a potential sanction for non-payment;
- include a value-based minimum threshold below which the levy is not charged, to prevent low viability development becoming unviable;
- provide greater certainty for communities and developers about what the level of developer contributions are expected alongside new development.

- 4.39 To better support the timely delivery of infrastructure, the government would also allow local authorities 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.

- 4.40 Another option the government are asking for views on is for the Infrastructure Levy to be optional and for each local authority to set their own. However, as planning obligations would be consolidated into the single Infrastructure Levy, the government anticipate that there would be a significantly greater uptake than with CIL.
- 4.41 Alternatively, the national rate approach could be taken, but with the aim of capturing more land value than currently, to better support the delivery of infrastructure. While developers would be liable for paying the levy, the cost of this would be capitalised into land value. 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.

Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights

- 4.42 In making this change to developer contributions for new development, the scope of the Infrastructure Levy would be extended to better capture changes of use which require planning permission, 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. This approach would increase the levy base and would allow these developments to better contribute to infrastructure delivery and making development acceptable to the community. However, it is proposed to maintain the exemption of self and custom build development from the Infrastructure Levy.

Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision

- 4.43 Developer contributions currently deliver around half of all affordable housing, most of which is delivered on-site. It is important that the reformed approach will continue to deliver on-site affordable housing at least at present levels.
- 4.44 Affordable housing provision is currently secured by local authorities via Section 106, but the Community Infrastructure Levy cannot be spent on it. With Section 106 planning obligations removed, it is proposed that under the Infrastructure Levy, authorities would be able to use funds raised through the levy to secure affordable housing.
- 4.45 This could be secured through in-kind delivery on-site, which could be made mandatory where an authority has a requirement, capability and

wishes to do so. Local authorities would have a means to specify the forms and tenures of the on-site provision, working with a nominated affordable housing provider. Under this approach, a provider of affordable housing could purchase the dwelling at a discount from market rate, as now. However, rather than the discount being secured through Section 106 planning obligations, it would instead be considered as in-kind delivery of the Infrastructure Levy. In effect, 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. This would create an incentive for the developer to build on-site affordable housing where appropriate. First Homes, which are sold by the developer direct to the customer at a discount to market price, would offset the discount against the cash liability.

- 4.46 Local authorities could also accept Infrastructure Levy payments in the form of land within or adjacent to a site. Through borrowing against further Infrastructure Levy receipts, other sources of funding, or in partnership with affordable housing providers, they could then build affordable homes, enabling delivery at pace.
- 4.47 Another option in the Planning White Paper is to create 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. A threshold would be set for smaller sites, below which on-site delivery was not required, and cash payment could be made in lieu. Where on-site units were purchased, these could be used for affordable housing, or sold on (or back to the developer) to raise money to purchase affordable housing elsewhere. The local authority could use Infrastructure Levy funds, or other funds, in order to purchase units.

Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy

- 4.48 It is important that there is a strong link between where development occurs and where funding is spent. Currently, the Neighbourhood Share of the Community Infrastructure Levy ensures that up to 25 per cent of the levy is spent on priorities in the area that development occurred, with funding transferred to parish councils in parished areas. There are fewer restrictions on how this funding is spent, and the government believes it provides an important incentive to local communities to allow development in their area. It is therefore proposed that the Neighbourhood Share would be kept, and the government would be interested in ways to enhance community engagement around how these funds are used, with scope for digital innovation to promote engagement.

- 4.49 The government are also seeking views about allowing Council's to spend the Infrastructure Levy more flexibly, including on other policy priorities or lowering Council Tax, if all the infrastructure has been provided – with the caveat that levy secured for affordable housing is protected.

Proposal 23: As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms.

- 4.50 The cost of operating the new planning system should be principally funded by the beneficiaries of planning gain – landowners and developers – 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.
- 4.51 If a new approach to development contributions is implemented, a small proportion of the 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. Some local planning activities should still be funded through general taxation given the public benefits from good planning, and time limited funding will be made available by the Government in line with the new burdens principle to support local planning authorities to transition to the new planning system as part of the next Spending Review.
- 4.52 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 – and enables early intervention if problems emerge with individual authorities.

Proposal 24: We will seek to strengthen enforcement powers and sanctions

- 4.53 The government will review and strengthen the existing planning enforcement powers and sanctions available to local planning authorities to ensure they support the new planning system. They intend to introduce more powers to address intentional unauthorised development, consider higher fines, and look to ways of supporting more enforcement activity.

5.0 OTHER IMPLICATIONS

- 5.1 Due to the need to change primary legislation, any 'new regime' is going to take some time to come in. The new proposal continues with 'Local

Plans', and there will be a transition period from the current system to the new one. Work on the Delivery and Allocations Plan is at an advanced stage and should not stop as it will provide the starting point for any 'new regime'.

- 5.2 In terms of expected timescales, there is currently a 12-week consultation period, which concludes at the end of October. The government must then be considering the responses to the consultation. This will take another few weeks. The government will then have to introduce primary legislation to change the Development Plan system and to scrap and replace CIL with a nationally imposed development levy mechanism, not to mention various other changes to the 1990 Act. It is unlikely the Government could introduce a Bill before the Christmas recess.
- 5.3 It is anticipated that it will be the New Year before Parliament could get to grips with draft legislation. It is too early to say whether the Bill will undergo much parliamentary debate or whether it will be fast-tracked in order to get to Royal Assent as fast as possible. However, it is expected that this legislation may well prove to be very controversial.
- 5.4 It is likely to be the Summer of 2021 before the changes the government is promising can actually be implemented.

6.0 RISK ANALYSIS

- 6.1 Given the White Paper is a consultation document on the Government's proposals, risks do not immediately arise from the contents of the paper. It is evident that, in time, if the proposals are brought into effect by legislation, then there will be an impact on the Planning Service. However, any legislative change arising out of the white paper will be the subject of a future report to the Board.

7.0 EQUALITY AND DIVERSITY ISSUES

- 7.1 There are no equality and diversity implications arising from the subject of this report.

8.0 LIST OF BACKGROUND PAPERS UNDER SECTION 100D OF THE LOCAL GOVERNMENT ACT 1972

Document	Place of Inspection	Contact Officer
Planning White Paper 'Planning for the Future' published on 6 August 2020 https://www.gov.uk/government/consultations/planning-for-the-future	Planning & Transport Strategy, Municipal Building	Alasdair Cross