

NATIONAL PLANNING POLICY FRAMEWORK (NPPF) CONSULTATION RESPONSE

12 September 2024

Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?

The Council does not object per se to the reversal of the changes made to paragraph 61 from December 2023. It is important to have a clear starting point in terms of what the minimum housing requirement should be. The Government now talks about “hard constraints” as being the reasons why a Local Planning Authority (LPA) might not be able to meet its housing requirement. However, the one “hard constraint” that has been left out is infrastructure. There continues to be a lag between growth and infrastructure delivery, which as far as the proposed changes are concerned the Government has still failed to address this major concern and constraint.

Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

This is not a tracked change in the glossary and paragraph 61 – The Council does agree that there should be one standard method for assessing housing need but strongly objects to the amended method being proposed by the Government.

Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

No, the Council does not support reversing the deletion of paragraph 130. The Government is expecting all Councils to meet the new standard method formulae even if that means that density will have to be increased. Yet there has been no consideration that in rural areas increasing density to such an extent to meet that new standard method housing requirement will have a radical impact on the character of the area to the detriment of residents visual and residential amenities. What if the vision in a local plan actually supports respecting the existing character of an area which is low density, rural and agricultural? These proposed changes appear to have been written by people who live in urban areas/cities without any consideration of rural UK, biodiversity, and the impact these will have on the character of many rural villages and towns across the country.

Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

No, the Council does not agree that the focus of design codes should move towards supporting spatial visions in local plans. The Government is expecting all Councils to meet the new standard method formulae even if that means that density will have to be increased. Yet there has been no consideration that in rural areas increasing density to such an extent to meet that new standard method housing requirement will have a radical impact on the character of the area to the detriment of residents’ visual and residential amenities. What if

the vision in a local plan actually supports respecting the existing character of an area which is low density, rural and agricultural? These proposed changes appear to have been written by people who live in urban areas/cities without any consideration of rural UK, biodiversity, and the impact these will have on the character of many rural villages and towns across the country.

Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?

The Council does support making the presumption in favour of sustainable development clearer by setting out that it refers to housing supply.

However, it is the consequences of these changes that the Council strongly objects to - as paragraph 15 of the consultation document states, the change to the standard method is going to bring more local authorities in the short term into the scope of the presumption. This is poorly thought out, the Council considers this a free ticket for developers waiting to submit planning applications. Maldon District is going to go from having a 5-year supply to not having one overnight when these proposals take effect. The day after the publication of these proposals we had developers contacting us for discussions on sites where for robust planning reasons we were moving toward refusals of planning permission as the schemes were not of good enough quality.

As a Council we are trying to bring forward a local plan review and this change will inevitably undermine our ability to positively plan-make because we will have to firstly reconsider our position considering the massive 97% increase in the housing requirement and this will delay the process, we had already made advances on in the last year. This is the greatest uplift in the whole of Essex; even beating the three cities in the county. As a District we have the smallest population and already have an infrastructure deficit to serve those people. Secondly, we will have to consider granting permission to applications ahead of that process, which undermines the plan-led system the NPPF update still has the audacity to advocate exists. The main issue and constraint in the Maldon District is infrastructure; it is lagging behind the growth in our present approved local plan and the bodies responsible for commissioning or delivery of those facilities are struggling to deliver due to lack of funds or borrowing capacity, complex internal approval processes before anything can be built or spending controls such as NHS England lease restraints tied to the District Valuer. All the while, our doctors' surgeries are operating at/ overcapacity, transport investment is behind growth, our education system is nearing capacity, our local NHS hospital is going to close with no NHS plan in place to bring forward either a dispersal of the services within the District or a new hospital to cater for an unforeseen increase in the population that the NPPF will demand. How are we supposed to plan to meet that target when public service investment is unlikely to follow? This will be an unsustainable Local Plan and contrary to the NPPF.

Our plan, prior to these proposed changes would have been to bring forward the standard method requirement of housing at 276 per homes per annum. This would have been a relatively small housing allocation of approximately 1.500 homes over 15 years, but it would have given the area a chance to catch up with the delivery of infrastructure from the previous plan due to end in 2029. The new standard method means over a 97% increase in the housing requirement – a figure that the market has never delivered, despite over-delivering per annum. In effect this is going to mean that the Council will very quickly move away from having a five-year supply after our plan adoption and we will end up with a housing trajectory in our plan that we know the market will never meet, because the evidence demonstrates this is something we have never achieved before, and this seems highly unlikely without

public investment. Overall, we believe these proposals are ill thought out especially with regard to the long-term consequences on rural and coastal areas and we are being set-up to fail, without additional tangible support being put in place.

Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

The Council does not support this proposed change. The new standard method means over a 97% increase in the housing requirement – a figure that the area has never delivered. In effect this is going to mean that the Council will very quickly move away from having a five-year supply after our plan adoption and we will end up with a housing trajectory in our plan that we know we will never meet, because the evidence demonstrates this is something we have never achieved before. Even with considerable housing allocations and windfall development since our last plan adoption we have not met that proposed standard method requirement. Overall, we believe these proposals are ill thought out especially with regard to the long-term consequences on rural and coastal areas.

Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

The Council strongly objects to this proposed change. Over-delivery places pressures on local infrastructure which always lags behind growth. Over-supply should therefore be left in the NPPF, and its accompanying guidance, local authorities should be able to set it against new supply need. The Government has failed to produce a comprehensive and coherent plan to demonstrate how infrastructure provision will be boosted to support such growth. In fact, to the contrary, the Government has now actually called into question £22 billion worth of planned infrastructure investment. The focus appears to be entirely driven by the number of houses to be built and not how the needs of the new occupants will be met, or how nice environments for them to live in will be protected/created.

Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

The Council strongly objects to this proposed change. With the new standard method housing requirement most Councils will lose their 5-year supply, this will only increase this pressure on LPAs as they fight off the deluge of planning applications that will come in as a result. This matter has been poorly thought out. LPAs already have staff resource capacity issues with a lack of planning officers especially at senior level and having to deal with the influx of major planning applications these changes are going to generate will place additional pressure on resources. In Maldon District Council, we have had to move policy planners away from local plan review into development management periodically in order to support resources because we are running the department with the majority of staff being outside contractors. This is financially unsustainable for a local authority to continue to do this. The additional support offered in these proposed changes put forward by the Government to support LPAs are unrealistic: planning application fees cannot be continually increased to cover contractor costs as they would become unviable for some smaller developers and household applicants. The need for new planners far outweighs the small amount of additional resource proposed by the Government (300 new planners – less than 1 per LPA) and these are needed now, not at some unspecified future date. Also, the Government may make funding for new planners available, but can the Government actually make planners come and work in places that find it really hard to recruit where they are not very accessible or where they compete with demand in surrounding areas? The Council

presently has 4 vacancies for senior planners in Development Management and after redesigning roles after several failed attempts to recruit in previous years could only appoint one officer because of the low numbers and poor quality of applicants.

Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

The Council strongly objects to this proposed change. With the new standard method housing requirement most Councils will lose their 5-year supply, this will only increase this pressure on LPAs as they fight off the deluge of planning applications that will come in as a result. This matter has been poorly thought out. LPAs already have staff resource capacity issues with a lack of planning officers especially at senior level and having to deal with the influx of major planning applications these changes are going to generate will place additional pressure on resources. In Maldon we have had to move policy planners into development management periodically in order to support resources because we are running the department with the majority of staff being outside contractors. This is financially unsustainable for a local authority to continue to do this. The additional support offered in these proposed changes put forward by the Government to support LPAs are unrealistic: planning application fees cannot be continually increased to cover contractor costs as they would become unviable for some smaller developers and household applicants. The additional support offered in these proposed changes put forward by the Government to support LPAs are unrealistic: planning application fees cannot be continually increased to cover contractor costs as they would become unviable for some smaller developers and household applicants. The need for new planners far outweighs the small amount of additional resource proposed by the Government (300 new planners) and these are needed now, not at some unspecified future date. Also, the Government may make funding for new planners available, but can the Government actually make planners come and work in places that find it really hard to recruit? The Council presently has 4 vacancies for senior planners and after advertising could only appoint one officer because of the low numbers and quality of applicants.

Question 11: Do you agree with the removal of policy on Annual Position Statements?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

The Council cannot see the point of this proposal. At the present time there is good strategic co-operation across Essex. This is just another layer of planning making it more complex. Instead, perhaps the system should place a greater legal duty on those authorities that deliver infrastructure to work in a more co-operative way with those that have to plan for the growth and allocate the land required. The previous Government removed structure plans and regional planning for a reason – it was time consuming and created more work, which by default cost more funding. It also placed a top-down approach to planning leaving local residents disenfranchised from the process. It is important to keep planning decisions at the most local level possible otherwise disenfranchisement from the process will lead to discontent and more objections to growth.

Strategic planning is going to have a challenging time if it is brought in again. As all local authorities have a massive increase in their housing requirement, it will be impossible for those local authorities who cannot deliver their housing requirement for whatever reason to negotiate moving it to a neighbouring authority because everyone will be trying to deliver

their own increased housing requirement and will not have the capacity to take on more growth.

In the Council's Housing and Economic Land Availability Assessment (HELAA) we are now unsure that we have enough land to allocate housing in the most sustainable settlements, given the 96% increase in the housing requirement under the new proposed standard method. Are we supposed to conjure up sites out of thin air to cover the need, or do simply allocate pieces of land where we are not even sure if they are available/deliverable?

Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

The Government needs to consider making the planning system less complex. The tests of soundness have always evoked "evidence fear" in local authorities and a fear of being found unsound. This delays submission of local plans for examination, means that LPAs overthink their plans, looking at all risks and trying to de-risk the plan. This is also because examinations are so expensive, time consuming and resource hungry. The Government should be looking to make them simpler and fast tracked. The majority of a local plan does not really need examining publicly, especially where strategic matters have been agreed through the DTC and a statement of common ground. The parts of the examination to be sat in public could be reduced or the examination could be done in writing – it does not have to be public at all. This would assist in bringing local plans forward more quickly, reduce cost and subsequently get more plans adopted and in place.

Question 14: Do you have any other suggestions relating to the proposals in this chapter?

The Government needs to consider making the planning system less complex. The tests of soundness have always evoked "evidence fear" in local authorities and a fear of being found unsound. This delays submission of local plans for examination, means that LPAs overthink their plans, looking at all risks and trying to de-risk the plan. This is because examinations are so expensive, time consuming and resource hungry. The Government should be looking to making them simpler and fast tracked. The majority of a local plan does not really need examining publicly, especially where strategic matters have been agreed through the DTC and a statement of common ground. The parts of the examination to be sat in public could be reduced or the examination could be done in writing – it does not have to be public at all. This would assist in bringing local plans forward more quickly, reduce cost and subsequently get more plans adopted and in place.

Question 15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No, the Council vehemently objects to the proposed change. The Council is incensed at this proposed change and has never used the word vehemently before in a consultation response. Maldon District's housing need will jump from 276 homes per annum using the previous standard method to 544 homes per annum which is a 96% increase. The Council was content and had no objections to the previous standard method: it produced a figure that was almost identical to the actual need identified via our Local Housing Needs Assessment plus the affordability ratio. It also produced a figure that corresponds with the actual annual average delivery number of homes by the housing market for the Council's present plan period. Looking back since 1992 the Council has never delivered 544 homes per annum: not even between 1997 and 2010. Since 1992 the average yearly completion has been 227 homes a year, with the highest yearly completion number being 450 in 1999.

Therefore, putting aside the acute infrastructure concerns, the possibility of Maldon District being able to achieve 544 going forward even with new allocations and windfall delivery is zero. This will have an effect on the Council's ability to meet the Housing Delivery Test, which the Council is meeting presently.

With the new standard method housing requirement most Councils will lose their 5-year supply, this will only increase this pressure on LPAs as they fight off the deluge of planning applications that will come in as a result. This matter has been poorly thought out. LPAs already have staff resource capacity issues with a lack of planning officers especially at senior level and having to deal with the influx of major planning applications these changes are going to generate will place additional pressure on resources. In Maldon we have had to move policy planners into development management periodically in order to support resources because we are running the department with the majority of staff being outside contractors. This is financially unsustainable for a local authority to continue to do this. Moving policy planners into development management also means that work on our local plan has been delayed and will be delayed further if we have to do this again following the proposed changes to the NPPF.

The influx of major planning applications these changes are going to generate will place additional pressure on resources. In Maldon we have had to move policy planners into development management periodically in order to support resources because we are running the department with the majority of staff being outside contractors. This is financially unsustainable for a local authority to continue to do this. Moving policy planners into development management also means that work on our local plan has been delayed and will be delayed further if we have to do this again following the proposed changes to the NPPF.

Question 16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3-year period for which data is available to adjust the standard method's baseline, is appropriate?

The Council would question why the Government has used the workplace-based median house price to median earnings ratio? It is not clear how this would reduce affordability in a location where the new Standard Methodology is going to exceed the identified need. Using workplace-based median figures does not consider the increase of people working from home and also appears not to have taken any information from the 2021 census about where people are now working. It would be very difficult for a district council to influence workplace earnings and the cost of market housing in order to drive a reduction in affordability. For a rural district, even one with the most flexible economic policies set out within a local plan, there is not a chance of driving forward significant job creation in the higher wage brackets to assist in driving down affordability.

In order for Maldon District to influence and drive down the Median House Price we have carried out some analysis and we believe that we would need to significantly change the size of property consented by the Council from mixed bedroom sizes at the moment with an emphasis on family housing to smaller cheaper properties, mainly flats and 1 & 2 bedroom homes so that we offer higher levels of lower cost housing. This would go against the evidence set out in our Local Housing Needs Assessment which advocates an increase in 3-bedroom family housing. This identified local need is supported by our housing register where 3- and 4-bedroom houses are higher in demand than smaller houses. Local Plan policies are supposed to be evidence driven, but this new approach would not be evidence driven, it would be Government target driven. There is also the viability of sites, which would decrease for developers if smaller properties were mandated by the Council to be built just in

order to drive down our affordability ratio and try and drive the housing target back to a level that gets nearer to need rather than a target set by the Government.

We would also point out that the Median House price is informed by the Land Registry who only record houses purchased at full market price hence it is the median of this higher figure not actual value of the total houses built. We believe that we have built too much housing at a higher value, and this has pushed up the affordability ratio. Unfortunately for families that have grown up in the district, typical rural family housing is not going to be affordable in the traditional sense of semi and or detached properties. Broadly speaking the only way that this type of housing could become affordable for new households is for wages to double or open market housing to decrease by 50%. This would mean a mixed increase in both social affordable housing and the delivery of smaller 1- and 2-bedroom homes and flats over and above what is already provided, but this could make development unviable and actually not cater to the identified local need in the District.

The Government appears to be looking at supply and demand in terms of making housing more affordable, it appears that the Government believes that pushing into the market more housing supply will equalise out the price of housing and make it more affordable. But in regard to housing this economic theory is not going to work in areas where the demand/need at present is being met by the existing standard method methodology. The present standard method is a “housing requirement” because its calculations for Maldon District match the need identified in our Local Housing Needs Assessment, but moving forward this will become a government imposed “target” and will actually have nothing to do with need. We will have to change our language in terms of how we speak to the general public about housing and what we put in our local plan – it will become a “target”, not a “requirement to address need”. In order for Maldon District to meet this imposed “target” the evidence shows our in-migration component of our population growth will have to significantly increase. Therefore, the changes will in effect be moving people (if that actually happens, which we doubt) into a district that already has poor transport connections with the rest of Essex. Given our evidenced limited education, health, public transport and employment opportunities, a high proportion of these people will then try and out-commute for their regular daily needs using their cars, and this also flies in the face of the drive to move away from car usage and onto public transport. The incoming Government, rather than steadying the ship on infrastructure and providing reassurance to Councils, actually immediately started scrapping planned infrastructure investments and commencing a review of many others. This has done little to show Council’s that there is any serious intent to ensure the new housing growth is ever going to be supported by the required infrastructure investment.

Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?

The Council would question why the Government has used the workplace-based median house price to median earnings ratio? It is not clear how this would reduce affordability in a location where the new Standard Methodology is going to exceed the identified need. Using workplace-based median figures does not consider the increase of people working from home and also appears not to have taken any information from the 2021 census about where people are now working. It would be very difficult for a district council to influence workplace earnings and the cost of market housing in order to drive a reduction in affordability. Even with the most flexible economic policies within a local plan, a district area which is rural and isolated from the main road network doesn’t have a chance of driving forward significant job creation in the higher wage brackets.

In simple terms in order for Maldon District to influence and drive down the Median House Price we have carried out some analysis and we believe that we would need to significantly change the size of property consented by the Council from mixed bedroom sizes at the moment with an emphasis on family housing to smaller properties cheaper, mainly flats and 1- and 2-bedroom homes so that we offer higher levels of lower cost housing. This would go against the evidence set out in our Local Housing Needs Assessment which advocates an increase in 3-bedroom family housing. This locally identified need is supported by our housing register where 3- and 4-bedroom houses are higher in need than smaller houses. Local Plan policies are supposed to be evidence driven. But this new approach would not be evidence driven it would be Government target driven. This is also without considering the viability of sites which would decrease for developers if smaller properties were mandated by the Council to be built just in order to drive down our affordability ratio and try and drive the housing target back to a level that gets nearer to need rather than target.

We would also point out that the Median House price is informed by the Land Registry who only record houses purchased at full market price hence it is the median of this higher figure not actual value of the total houses built.

The Government appears to be looking at supply and demand in terms of making housing more affordable, it appears that the Government believes that pushing into the market more housing supply will equalise out the price of housing and make it more affordable. But in regard to housing this economic theory is not going to work in areas where the demand/need at present is being met by the existing standard method methodology. The present standard method is a "housing requirement" because its calculations for Maldon District match the need identified in our Local Housing Needs Assessment, but moving forward this will become a government imposed "target" and will actually have nothing to do with need. We will have to change our language in terms of how we speak to the general public about housing and what we put in our local plan – it will become a "target", not a "requirement to address need". In order for Maldon District to meet this imposed "target" the evidence shows our in-migration component of our population growth will have to significantly increase. Therefore, the changes will in effect be moving people (if that actually happens, which we doubt) into a district that already has poor transport connections with the rest of Essex. Given our evidenced limited education, health, public transport and employment opportunities, a high proportion of these people will then try and out-commute for their regular daily needs using their cars and this also flies in the face of the drive to move away from car usage and onto public transport. The incoming Government, rather than steadying the ship on infrastructure and providing reassurance to Councils, actually immediately started scrapping planned infrastructure investments and commencing a review of many others. This has done little to show Council's that there is any serious intent to ensure the new housing growth is ever going to be supported by the required infrastructure investment.

Using the 2014 household projections and the present Standard Method formula it worked out correctly in terms of Maldon District's Local Housing Needs Assessment plus the affordability ratio. It also was the correct figure in terms of the annual delivery number of homes for the Councils present plan period. Looking back since 1992 the Council has never delivered 544 homes per annum. Therefore, putting aside the acute infrastructure concerns, the possibility of Maldon District being able to achieve this going forward even with new allocations and windfall delivery is zero. This would have a significant negative affect on our 5-year supply and most likely mean we would not be able to meet the Housing Delivery Test (which we are meeting presently).

Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

The Council would question how factoring this in would affect the future rental affordability of homes. In areas where the private rented stock is higher than the social rental stock which one would be taken into account? If it was social rental stock those with a higher stock would appear to be more affordable. This would once again skew the outputs to the detriment of those places with a low social rental stock.

Question 19: Do you have any additional comments on the proposed method for assessing housing needs?

The Council does not want a return to the past with housing need being assessed by an Objectively Assessed Need. This method was time consuming and costly and led to unnecessary argument at examination. The standard method is a more effective way of calculating housing need and calculating it in a more consistent way across England. However, it was not broken and did not need fixing, it worked out at approximately the correct figure for Maldon District, when having regard to our Local Housing Needs Assessment and past housing delivery performance.

The Council is extremely concerned about the proposed changes. We vehemently object to them. This is the first time we have ever used the word “vehemently” in a consultation response, which shows we are so concerned and incensed about the proposed changes. The effect this will have on the District of Maldon will be extremely detrimental to both our residents and our staff. These proposed changes are an open ticket on developers to submit planning applications. We will go from having a five-year supply of housing to not having one overnight. This will undermine our ability to Plan make, it may also mean moving resources into development management from planning policy in order to cope with the all the additional planning applications. The Council will be forced to approve planning applications for housing in places that we do not consider appropriate for growth, and this will place undue pressure on our already stretched infrastructure. We are in an area that piling in more housing when there is no evidence we need it, is going to place such pressure on our infrastructure, which is already at a deficit, with the solution to highway capacity issues to get in and out of the District being to either build more roads or increase their capacity by expensive upgrades., This flies in the face of Essex County Council’s place and movement agenda because in a rural area people are going to use their cars when the public transport is not available to absorb this increase of un-needed growth.

These new proposals are ill thought out in terms of even short-term consequences, with the Government seemingly only concerned with housing numbers granted permission, not housing delivery on the ground. The Government appears to be looking at supply and demand in terms of making housing more affordable, it appears that the Government believes that pushing into the market more housing supply will equalise out the price of housing and make it more affordable. But in regard to housing this economic theory is not going to work in areas where the demand/need at present is being met by the existing standard method methodology. There is no evidence in Maldon District that there is a need for 544 homes per annum and it will effectively mean that Council will be looking for a massive increase in inward migration, which does not exist presently in terms of how our population grows. The companies developing in the District have been slowing down completions because the market has slowed down, and this has got nothing to do with the number of permissions granted: we presently have 2994 homes with permission not built out in the District. The Government should be looking first and foremost at providing a means to

accelerate infrastructure delivery by public bodies and support to unlocking land banked and stalled development sites, rather than pressuring Councils to add 10,000's of more units to those already not being built. It would appear the Government has focussed attention on the planning system to plug the hole, however the planning system can only lead the horse to the water – the Government needs to force developers to actually build out the sites and it is shameful there is little in the proposals to make developers work differently.

Maldon District is a rural coastal district and therefore the jobs we have locally are limited in number and range of sectors. This results in there being many people living in the District who have to commute outside for work. This travel is dominated by cars because public transport links are poor. These proposals therefore run contrary to the primary tenets of sustainable development whereby people should be reducing their travel by car. We will in effect be building houses (if they actually get built) for people to move into the District and then out commute for work by car. In terms of infrastructure requirements: the health service in the District is stretched to breaking point by the NHS's own admission; the schools are nearing capacity; the District is going to lose its hospital, with no apparent route to a replacement service; and public transport is poor. There is a high need for affordable housing, with many people bidding for each home that becomes available. Development can only fund so much infrastructure without the development becoming unviable and in terms of priorities it cannot pay for everything. Biodiversity Net Gain is now mandatory and more generally: health, education and affordable housing are seen as a greater priority than transport. The District has just lost its on call public bus and taxi service because it is not viable to run it anymore as a private business. Though the County Council are seeking a replacement it is going to be difficult to find a company to run this service when the previous service has gone under because of viability and falling passenger numbers since Covid. Strategic planning is going to have a challenging time if it is brought in again. As all local authorities have a massive increase in their housing requirement, it will be impossible for those local authorities who cannot deliver their housing requirement for whatever reason to negotiate moving it to a neighbouring authority because everyone will be trying to deliver their own increased housing requirement and will not have the capacity to take on more growth.

Overall, the Council would urge the Government to reconsider these proposed changes. There seems to be a persistent message that the Planning system is holding up houses being built. However, we have already mentioned our approx. 3,000 consented plots that are not being built. Government needs to realise that the planning system cannot currently physically make developers put a spade in the ground and build houses.

Government should have a closer look at where the actual blockages are to getting bricks and mortar constructed on the ground. Perhaps Council's should be given more powers to require developers to commence sites, finish sites, or rescind permissions where there has been no obvious move to commence over an extended period. Also, the Government should consider making lack of infrastructure a "hard constraint" in terms of bringing forward growth or provide a more effective way of delivering the key infrastructure projects such as transport, education and health projects. The Government could underwrite these projects and be paid back via Community Infrastructure Levy (CIL) or Section 106 (S106) funding, which would resolve many of the infrastructure issues across the Country.

Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

The Council supports the proposed change set out in new paragraph 122c. However, the Government seem to be under the impression that brownfield land is available in abundance

everywhere and this is not the case. In a rural district like Maldon District where there is no history of mass industry there is little brownfield land and most of it is either in active economic use or in areas of high flood risk. We would suggest that the NPPF is altered to support brownfield land in areas of flood risk where that land is a blight on the area in terms of impact on amenities and needs to be developed and where this could unlock better defences being installed. This will mean a consistent approach across the country and help bring more brownfield land forward.

Question 21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 32: Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 33: Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?

The Council supports that it should be for LPAs to determine tenure mixes for affordable housing for their own areas.

Question 35: Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 38: How and at what level should Government set benchmark land values?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 39: To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 40: It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 41: Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers' sites and types of development already considered 'not inappropriate' in the Green Belt?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 43: Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 46: Do you have any other suggestions relating to the proposals in this chapter?

This relates to Green Belt development and is not applicable to Maldon District which does not have any Green Belt.

Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

The Council would support the setting out in policy the tenure expectations for affordable housing. This makes planning for affordable housing more transparent and allows for future planning. However, the registered housing providers are struggling to take on affordable housing and in at least one case the Council has had to waive affordable housing on sites because a provider could not be found. It should be possible for a local authority who is not a social housing provider already or a stock holding authority to become a RSP as a last resort and this should be supported by the Government financially in order to assist in the delivery of affordable housing and to help with any loss of this type of housing going forward.

Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes, the Council would support this, it was overly complicated and difficult to administer and in areas with a high social and affordable housing need is undermining the ability of local authorities to support and approved affordable housing. The Government does need to ensure a policy is in place for Discount Market Sale in terms of this tenure as Affordable and therefore registered provides and local authorities can then be eligible to apply for and receive Grant if this tenure is provided on a mixed tenure scheme. A flexible grant support system from the Government towards affordable housing is a priority if the Government want to deliver a significant increase in the number of additional affordable homes.

Question 49: Do you agree with removing the minimum 25% First Homes requirement?

Yes, the Council would support this, it was overly complicated and difficult to administer and in areas with a high social and affordable housing need is undermining the ability of local authorities to support and approved affordable housing.

Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

No further comment.

Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes, the Council would support introducing a policy to promote developments that have a mix of tenures and types.

Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

In smaller settlements, where there is a housing needs assessment, demonstrating a local affordable housing need, having a national rural affordable housing policy which sets a maximum site size or number could assist in bringing forward rural affordable housing. Making this local to the settlement through policy would also assist with local support for this kind of housing. Whilst Councils can do this now, there is insufficient funding to carry out housing needs assessments on all of the small settlements in an area frequently, particularly if an area is very rural and has many smaller settlements. Having a national fund that communities can call on to fund this activity would be beneficial especially for rural areas and help to evidence rural affordable housing need, this need then could be supported through policy in local plans or national policy.

Question 53: What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Having a maximum site size is difficult because some rural settlements are small, in terms of households but they have services and facilities to enable those living in them to get their basic day to day living needs. They may not have a school or doctors but have a shop. These types of settlements should not be swamped by new development, because it alters their character and unless the growth is substantial it does not bring a school or doctors into the community. An alternative could be a % of the overall homes in the settlement, this would have to be reasonably low as large sites could swamp and drastically alter a settlement in terms of its impact on local character.

Question 54: What measures should we consider to better support and increase rural affordable housing?

A national fund should be available for the carrying out of housing needs assessments which local communities could call on so that they could ascertain a more accurate figure for local rural affordable housing need. This would assist if communities wanted to bring forward community led housing.

Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

The Council supports the changes to paragraph 63 of the existing NPPF.

Question 56: Do you agree with these changes?

The Council supports the changes with regard to Community Led Housing.

Question 57: Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

The Council has no further comment on this matter.

Question 58: Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Within Maldon District, the land has not come forward in regard to small sites – most sites within the HELAA are over 1.0ha in size. The proposals can make the requirement mandatory but if there is not the land then the Council cannot deliver. Maldon Council will not be able to make the 10% allocation, however it might have done with a smaller housing requirement under the original Standard methodology, but not with the significant increase in housing need. 1.0ha is too large for most small rural settlements and this site size might end up dominating the original settlement especially if there were a number of these sites to consider. It would be more appropriate to allow a % of smaller sites to come forward as a windfall amount to be included in the calculations for the total supply of housing. Local Authorities could then set the parameters around these sites and where they would support them in terms of which settlements. This would then form a control over allowing too much development in small rural settlements thereby overwhelming them and it would push larger allocated developments into more sustainable communities.

Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to ‘beauty’ and ‘beautiful’ and to amend paragraph 138 of the existing Framework?

The Council supports this proposal.

Question 60: Do you agree with proposed changes to policy for upwards extensions?

The Council supports this proposal.

Question 61: Do you have any other suggestions relating to the proposals in this chapter?

No additional suggestions to make.

Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

The Council supports this proposal.

Question 63: Are there other sectors you think need particular support via these changes? What are they and why?

The Council has no comment on this question.

Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

The Council has no comment on this question.

Question 65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

The Council has no comment on this question.

Question 66: Do you have any other suggestions relating to the proposals in this chapter?

None.

Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

The Council does support these changes but would point out that there is already significant weight placed on the delivery of infrastructure within the planning process.

Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

The Council supports these changes.

Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Whilst the Council supports the proposed changes to paragraphs 114 and 115. The Council objects to the last sentence in paragraph 115 which states “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, *in all tested scenarios.*” This effectively means that any Highway Authority cannot object to a development if one tested scenario has a lesser impact on the road network. If a site has 4 different access routes, 3 of which Highways consider would be unacceptably impacted but 1 is ok, then the development would be acceptable. However, we cannot force residents to use the 1 ‘ok’ access point. So, this will inevitably create additional pressure on those 3 poor access routes which will increase the hazard and risk to life. In addition, this could create bottlenecks and additional highway impact on that one part of the network with the lesser impact. It should be for the Highway Authority to determine the level of impact either from a single development or cumulatively and a greater weight should be placed on cumulative impact, especially as there are going to be many applications submitted when local authorities lose their 5-year supply if the new housing standard method is implemented. This appears to be a way of allowing developments that could have a severe impact on the safety of the majority of the highway network in an area, just because it has one route that might be ok and is the opposite of the need to move away from high car usage and the impact road vehicles have on climate change.

Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

There should be a national policy capping the number of takeaway outlets there can be in High Streets, the permitted development rights for change of use in high streets should be looked at again to stop the proliferation of takeaway outlets.

Question 71: Do you have any other suggestions relating to the proposals in this chapter?

None.

Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

No, the Council does not agree with this proposal. It is important that these types of application are determined at a local level so local considerations can be taken into account. Whereas an offshore farm has limited localised impacts, onshore farms have the potential for significant and long-lasting impacts on the local landscape and residents. Putting these applications into the NSIP regime takes away the ability of residents to engage properly in the planning process and creates a top-down imposed planning system.

Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

The Council supports the proposals. However, the right for residents to object should not be undermined. Local Planning Authorities should still be allowed to take into account all the concerns of residents when determining these types of applications and if there is a detrimental impact on residents, a local authority should be able to refuse these types of applications.

Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

The Council would support additional protections for habitats that play a role in carbon sequestration.

Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

The Council would support this as it means more applications would fall within the local decision-making process.

Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

The Council would support this as it means more applications would fall within the local decision-making process.

Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

No further comment.

Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Essex County Council has tried to develop a net zero planning policy but this in itself is a difficult task and has resulted in a complex policy that is difficult for all to follow. Neither are there the resources to monitor it and it remains problematic as to its overall effectiveness in terms of implementation. There must be a way found to simplify this matter at a national level so that people can engage with it more effectively.

Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Presently the issue is too complicated for the average person to understand and even planning officers find it too complicated. Essex County Council has tried to develop a net zero planning policy but this in itself is a difficult task and has resulted in a complex policy that is difficult for all to follow. Neither are there the resources to monitor it and it remains problematic as to its overall effectiveness in terms of implementation. There must be a way found to simplify this matter at a national level so that people can engage with more effectively.

Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?

It should be made clear that site allocations should not happen in areas of high flood risk. This is a hard constraint and national policy should set out clearly what is expected of LPAs in regard to land in high flood risk. The only exception would be brownfield land which could be a blight on a community if left undeveloped and could add to housing supply.

Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?

The consultation document and questions above make great fanfare about the reduced costs and efficiencies of solar power generation justifying altered thresholds.

In light of that, now would be an opportune moment for Government to take the positive step of introducing a mandatory requirement for PV generation to a certain minimum level be installed on all new homes along with battery storage, and potentially commercial buildings (or within the site area).

Question 82: Do you agree with removal of this text from the footnote?

Removal of the footnote does not compromise the ability of the NPPF to protect the best and most versatile agricultural land. Instead of removing the footnote why does the Government not move it into the main body of the text within the NPPF. The protection of the land we grow our food on is an important matter and the NPPF should continue to place great emphasis on it as a priority for protection from development.

Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?

No further comment.

Question 84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

The Council supports any improvements to bringing water infrastructure to completion faster.

Question 85: Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Presently, the mechanism for funding water infrastructure leaves a lag in time between the completion of growth and the upgrade to water infrastructure, particularly water recycling centres. Water companies AMP funding programmes are unaware of the impact of future growth and the impact it will have on their infrastructure. The Government needs to look at bridging that funding gap in the planning process. This takes on a level of urgency if the proposed changes to the national standard method increase the number of homes as set out. It should also be mandatory for water authorities to publish yearly to local authorities capacity levels of their infrastructure and their plans to upgrade in conjunction with growth – at the present time local authorities have to ask for this information and it does not always accord with comments on planning applications.

Question 86: Do you have any other suggestions relating to the proposals in this chapter?

None.

Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

The Council agrees that the policy criteria should be revised. They need to be flexible, as the delays in local plan making are not always a local authority's fault. A general election and political changes mean plans are going to be delayed. The difficulties in evidencing delivery which many councils are now going to have to revisit will also delay plan making and local authorities should not be penalised for these sorts of delays. For example, in Maldon we are likely to have to carry out additional calls for land as we do not currently have sufficient submissions to meet this increased need.

Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

No, the Council would not support this, there needs to be clear policy criteria so that reasons for intervention are clear to everyone.

Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?

Yes, the Council supports this proposal but is this full cost recovery? What if a planning department is staffed by more costly consultants and you cannot recruit full time planners? It is a moot point Maldon District Council cannot recruit qualified development management planners despite numerous efforts to do so.

Question 90: If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

The Council supports an increase in householder application fees to meet cost recovery.

If Yes, please explain in the text box what you consider an appropriate fee increase would be.

Question 91: If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Yes

No – it should be higher than £528

No – it should be lower than £528

no - there should be no fee increase

Don't know.

There are already a range of permitted development rights available to homeowners that allow significant alterations to their property without having to apply for planning permission and thus don't attract a fee. However above and beyond this, the homeowner is likely to be realising an uplift in their property value by carrying out larger extensions and alterations. It seems reasonable that the general taxpayer should not be burdened with the cost of allowing another individual to increase the value of their property. Therefore £528 does not seem unreasonable. However, homeowners are already faced with Architect/Agent fees, building regulations fees, and other costs of development. Therefore, the level of supporting information required with a householder planning application should perhaps be clarified and limited, so as to reduce the overall burden on residents wanting to improve their homes. The

cost recovery amount should be set locally because different councils have different costs and £528 may not cover all costs in all councils, some councils will actually make money on the amount, and some will lose out.

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.

Question 92: Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

See response to Question 91

Question 93: Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

No

Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee? Please give your reasons in the text box below.

The Council would not support this. Whilst on the surface it seems like an appropriate way forward it could create disparity between areas in terms of planning fees and this could discourage development in one area favouring another area because of the cost of obtaining planning.

Question 95: What would be your preferred model for localisation of planning fees?

Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.

Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.

Neither

Don't Know

Please give your reasons in the text box below.

Question 96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?

Yes. The wider public expects local councils to fully fund both plan making and planning enforcement. Local authority budgets are stretched and particularly enforcement is the one service within planning which suffers from budget constraints. Raising fees beyond cost recovery to help fund both enforcement and plan making would relieve some budgetary pressure within Councils. It would be important to ring fence any additional fee funding to retain it within planning services.

Question 97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

The wider public expects local councils to fully fund both plan making and planning enforcement. Local authority budgets are stretched and particularly enforcement is a service which is the one service within planning which suffers from budget constraints. Raising fees beyond cost recovery to help fund both enforcement and plan making would relieve some budgetary pressure within Councils. It would be important to ring fence any additional fee funding to retain it within planning services.

Question 98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Yes, it is important that if the local authority is providing a service, then it should be funded by fees.

Question 99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Not applicable (N/A).

Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

It is important that any cost recovery is ring fenced to the planning service within a local authority.

Question 101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

N/A

Question 102: Do you have any other suggestions relating to the proposals in this chapter?

None.

Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

The transitional arrangements will not affect Maldon District Council as we have to yet reached Reg 19 consultation.

Question 104: Do you agree with the proposed transitional arrangements?

No comment.

Question 105: Do you have any other suggestions relating to the proposals in this chapter?

None.

Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

The changes to the standard method will negatively impact on every resident within Maldon District, by opening the flood gates to a free-for-all of unwanted development, reducing their Council's ability to properly plan and manage development in their District and by placing further pressure on infrastructure which is already either at capacity or over capacity. The one thing that the Government can do is pause these changes from going ahead whilst it accurately assesses the social, environmental, and economic impacts of them across the whole country. Whilst this might delay plan making, a delay is preferred to the potential catastrophic effects the proposed changes could have, which will be difficult to reverse.