

Changes to the Planning System White Paper 2020

Response on behalf of North Norfolk District Council

October 2020



On 6 August, 2020, Government published two separate consultation documents which seek views on significant and far reaching changes to the planning system. '[Changes to the current Planning System](#)' proposes a number of short term changes which could be implemented without the need for extensive reviews of primary legislation. The '[Planning for the Future](#)' White Paper proposes much more significant reform, requiring a longer implementation period and transitional provisions.

This paper provides a short overview of the **Changes to the Planning System** consultation proposals and details North Norfolk District Councils response, outlined below in four sections:

Section 1 - Revised Housing Need calculation

Section 2 - Low Cost Home ownership

Section 3 - Revised affordable site size thresholds

Section 4 - Permissions in Principle

Section 1

Revised Housing Needs Calculation

1.1 The requirement for new homes in each District is currently determined via a standardised methodology which is applied nationally and produces individual authority projections of the number of new homes which are likely to be required. This 'requirement', alongside capacity considerations, determines how many homes should be aimed for in Local Plans. Whilst the methodology has been reviewed on more than one occasion its basic approach has largely remained constant in that it starts with population growth projections, converts population growth into a requirement for households (homes) and then adds varying uplifts to the resulting number based on the relative affordability of homes in relation to local incomes.

1.2 The current standard method first appeared in the 2019 NPPF and assesses household growth and affordability (the ratio of prices to incomes, as of now) to generate a figure of 'local housing need'. After less than 2 years of being in place, Government has now decided that a refresh of the standard method is needed, with some significant changes;

- Firstly, at a national level the current method yielded around 270,000 homes a year when it was published; now Government has set the bar higher at 337,000 homes per year hoping this will increase the likelihood that 300,000 will actually be delivered;
- Secondly, the new method aims to ensure that the baseline figure for housing isn't unduly low as a result of household projections in some areas indicating that few homes are required, by introducing a 'floor' of adding at least 0.5% of existing stock. In other words, if there is no need in a particular area that authority would nevertheless have to provide for at least 0.5% growth. This is argued to be 'each authority doing its bit' towards contributing toward the national requirement.

- Thirdly, Government has placed a renewed emphasis on local affordability – a change which has had a significant impact on numbers in less affordable areas, including North Norfolk. The idea that homes should be built in high demand areas, where people want to live (as indicated by a high affordability ratio) has been a longstanding view of Government. Although the current method does apply an uplift based on how unaffordable an area *currently* is, the new method goes even further by also including a further adjustment based on *how much worse (or better)* an area’s affordability has got in the last 10 years;
- Finally, the cap which was previously in place (no authority to face an increase of more than 40% above the household projections or plan requirement, depending on the age of their current plan) has gone. This represents somewhat of a change of tune from Government; having previously said that a cap was needed to ensure numbers were “*deliverable*”, it’s now of the view that applying a cap is “*not compatible*” with the step-change which is needed to boost supply as quickly as possible.

1.3 On top of all these changes, the standard method for assessing local housing need is now not the only step in the process. In due course, government is set to publish housing *requirements* - a second stage where the numbers reflect not only housing demand (as indicated by the method for assessing local need set out in the proposals), but also land supply factors. The suggestion here, although no details are provided in the consultation, is that government will stipulate how matters which impact on land availability such as environmental constraints like flood risk or AONB could be taken account of in setting a local housing target.

What would the changes mean in North Norfolk?

1.4 Simplifying how local authorities calculate their housing need number for the purposes of plan-making has been a key element of improving efficiency in plan-making. The current national standard method was introduced in 2018 and replaced a process of locally derived targets produced via the production of Strategic Housing Market Assessments. The underlying rationale behind the requirements is to ensure that everyone has a home in the area they wish to live in –it is essentially a demand based approach. Previous approaches, including the current standard methodology, have relied largely on the demographic evidence (population projections) to arrive at a figure. The inclusion of affordability uplifts results in more homes being required than the demographic evidence alone indicates will be necessary, with those in unaffordable areas being required to deliver more.

1.5 The changes, now proposed, add two affordability uplifts, the first based on affordability ratios today and the second to account for any worsening (or improvements) in affordability over time.

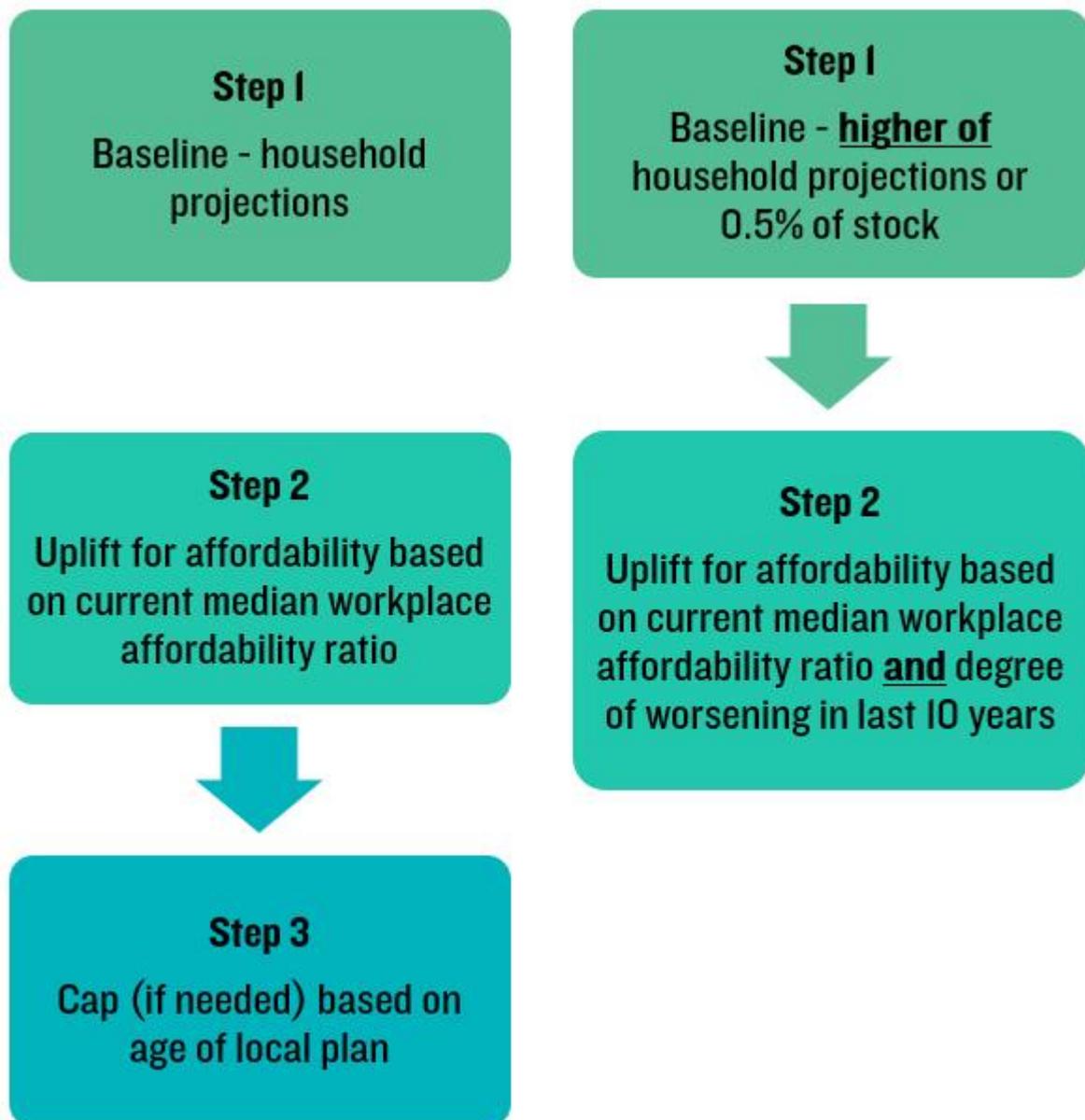
1.6 The existing approach is:

1. Households projected to be needed in the 2014 ONS National projections.
2. Add an affordability uplift of a prescribed size
3. Cap the result to keep it realistic.

1.7 This produces a figure of around **550** dwellings per year in North Norfolk which is substantially above the 400 per year provided for in the adopted Core Strategy and higher than recent delivery rates which average just over 500. The new Local Plan is based on a requirement to deliver 550 per year.

1.8 The proposed new method applies two separate affordability uplifts, one for absolute affordability and a second for how affordability has worsened over time. Both of these adjustments have a significant impact in North Norfolk and produce a much higher requirement of around **730** dwellings per year.

Figure 1 – Difference between current standard method and proposed standard method for assessing housing needs (simplified)



Source: Lichfields

1.9 When applied in North Norfolk the proposed new methodology produces an annual requirement of **730** dwellings per annum (**73%** uplift on the demographically derived requirement). **Figure 2** compares this to the results of the current method and other locally derived targets which have been used in recent years.

Figure 2: Recent Housing Requirements/targets in North Norfolk

Number of Homes per annum	Source	Comments
400	Adopted Core Strategy target	This figure was derived from the now revoked Regional Spatial Strategy and is based on evidence which is now regarded as too old to be relied upon.
420	Strategic Housing Market Assessment 2019	Locally produced figure based on national household projections modified to take account of local evidence. This figure is essentially the unadjusted population derived requirement without uplifts applied.
552	Current Standard Methodology	National 2014 Household Projections, plus an affordability uplift with a cap.
580	Number planned for in new Local Plan 2016-2036	Relies upon all draft sites being allocated with an allowance for existing commitments and future windfall. New Local Plan would be approx. 3,000 homes short of delivering new minimum requirement under the now proposed methodology.
730	Housing Requirement figure produced by proposed new methodology.	Increase is largely the result of a much more substantial affordability uplifts rather than any increase in the 'real' (demographically derived) requirement.
520	Average number of homes delivered in each of the last three years	Last three year average is much higher than long term trend reflecting availability of larger development sites. Ten year average is closer to 400 per year.

Note: It is important not to confuse housing 'Requirement' with the Local Plan housing 'Target', these may in some circumstance be very different figures. The housing *requirement* is the figure produced when you apply the standard methodology and serves as the minimum proxy for the number of homes which are said to be required to meet all likely future needs. In evidenced circumstances the Local Plan *target* can be higher or lower than the requirement as the Plan should test the ability of an area to address its own need and the desirability or otherwise of exceeding the requirement, for example, to stimulate regeneration.

What does this mean for the new Local Plan?

1.10 As outlined in **Figure 2** the work on the current new Local Plan would deliver a possible 580 dwellings per year. If this number can be defended it would provide for slightly more than the current standard methodology requires but it would be some 3,000 homes short of the requirement over a 20 year plan period under the proposed new approach. If introduced, these 3,000 homes would need to be found on additional newly allocated sites as any significant increase in the potential windfall contribution is not likely to be defensible. A Plan which is 3,000 dwellings short would undoubtedly fail at Independent Examination. **In short, we would have to produce another Plan.**

1.12 The consultation document requests answers to a number of specific questions (below). In addition to responding to these the following general response is also recommended.

- a) There is no evidential basis for a national target of 330,000 dwellings per annum. This is nearly twice the growth rate identified as needed in the population and household projections. This essentially means government is setting a target to build homes for which there are no occupants.
- b) The proposals perpetuate and accelerate growth in rural, and often environmentally constrained areas of the country. This is not sustainable and will not help to address climate change measures
- c) There is no local evidence of this level of need, inadequate infrastructure to support this level of growth, and no capacity in the local industry to regularly deliver this quantity of homes. Plans based on this approach are highly likely to fail and this will serve to undermine public confidence in the planning system.
- d) There is no strong evidence that building more will have any appreciable impact on dwelling affordability, or deliver more affordable homes, which is one of the cited rationale for increasing the numbers.

Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?

North Norfolk objects to such an approach on the basis that it is not based on local evidence of housing need. Whilst recognising that it is intended to ensure that each authority makes a minimum contribution to national requirements figures based on a % increase on existing housing stock would appear to have little, if anything, to do with local demand and need for new homes. There is a real risk that the market would have little interest in providing such homes in areas where the evidence suggests there is no need and demand. A simple flat rate increase irrespective of demand and local need departs from governments own guidance that housing growth requirements should be grounded in evidence.

Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

If minimum % increases in stock levels are to be applied North Norfolk would not object to 0.5% increases per annum being used as a minimum baseline requirement. (Member Note: This measure would have no impact in North Norfolk as the standard methodology results in higher annual targets than a minimum 0.5% increase would require).

Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

No, North Norfolk objects to the use of such escalators on the following basis:

- A) *The number of new homes required derived from the national household and population projections (with appropriate evidence based adjustments) already provide for sufficient for all existing and newly forming households to be properly housed. Applying uplifts in the way envisaged by the methodology results in far more homes being planned for than the evidence suggests will be required. In the case of North Norfolk the impacts of applying the two separate affordability uplifts is to increase the requirement from around 420 (demographic growth) to 730 dwellings per annum, an unjustified increase of over 70%. Under these*

proposals the District would be required to provide 70% more homes than the evidence suggests are actually required.

- B) These uplifts are suggested as a response to local affordability but the consultation proposals offer no mechanism to ensure that more of the homes built are genuinely affordable. There is no clear evidence that increasing the local housing stock will have any meaningful effect on overall house prices particularly in those areas such as North Norfolk where the housing market is primarily driven by inward migration of comparatively well off people rather than broader supply and demand factors.*
- C) Basing housing requirements on indices which change on an annual basis lacks stability and increases uncertainty and areas of potential challenge. The way in which the algorithm works means that relatively minor changes in local affordability indices have significant impacts on the resulting requirement. The District has neither the development industry nor the environmental, economic or infrastructure capacity to deliver the resulting scale of growth. Furthermore, such approaches reinforce the delivery of high levels of growth in rural and comparatively unsustainable locations. This does nothing to level up and rebalance the economy, it simply perpetuates high growth levels in the south east and midlands.*
- D) Setting unjustified and undeliverable requirements in Local Plans will result in such Plans failing which will undermine the plan led approach and serve to undermine community confidence in the planning system.*

Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

No, North Norfolk objects to the inclusion of affordability uplifts of the type, and in particular size, proposed by the methodology for the reasons outlined in the answer to question 3.

Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

No, North Norfolk does not agree that affordability uplifts of the type and scale envisaged are justified or given appropriate weighting within the standard methodology. There is little evidence that building larger numbers of homes in areas where the housing market is driven by well off inward migration of those looking to retire, as is the case in North Norfolk, will have any appreciable impact on local dwelling affordability and neither do the proposals here, or in the Planning for the Future White Paper, adequately address the issues of affordable homes provision and high levels of second home ownership. Rather than increasing the number of homes built government should focus on ensuring that more of the right types of homes are built and that these are usefully affordable and meet locally identified needs.

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:

Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?

No, Authorities which have completed Regulation 18 Consultation will have invested significant time and resource in the preparation of their Plans and should be given a short period of at least six months, not three, to publish their Reg 19 Plans based on the current methodology.

Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate? If not, please explain why. Are there particular circumstances which need to be catered for?

North Norfolk considers that a period of six months for publication and a further six months for submission would be more appropriate and give those Authorities at an advanced stage of Plan preparation a fair and reasonable prospect of completing their Plans in accordance with current guidance. Such Plans would then need to commence the process of review but would be doing so from an established, Plan led position.

Section 2

Low Cost Home Ownership Proposals

2.1 Government proposes to mandate that at least 25% of any affordable homes provided through developer contributions are provided as a new low cost home ownership product - First Homes. First Homes would be made available to occupiers with a minimum 30% discount, but where locally proven to be needed a 40-50% discount on open market values could be required.

2.2. First Homes proposals were subject to a separate consultation earlier in the year when government intended to limit the size of the discount to 30% and the proposals did not at that time include provisions to ensure the benefit of the discount was passed on to subsequent occupiers – i.e. homes were not affordable “in perpetuity”. In response to concerns raised at the time, government has allowed for greater discounts up to 50% to be applied (subject to local evidence) and would require these discounts to be passed on to subsequent occupiers. As with other tenures of affordable homes, occupancy would be limited to those in housing need.

2.3 These proposals are a welcome improvement on the earlier consultation but it remains the case that low cost home ownership irrespective of the size of discounts applied will be a comparatively less affordable tenure in North Norfolk than social and affordable rented properties due to low household income levels amongst many in housing need. As low cost home ownership would directly replace other affordable tenures (they are ‘instead of’ rather than in ‘addition to’) it remains a concern that the consultation requires a set proportion of not less than 25% of this tenure type. It would be preferable if matters relating to quantity were determined at a local level based on needs assessment and how usefully affordable such homes would be.

2.4 First homes should make up at least 25% of affordable homes delivered via developer contributions (currently through Section 106 agreements). The tenure of the remaining 75% of affordable homes would be a local decision and would relate to any Local Plan policy. For example, if a Local Plan currently required 50% low cost home ownership and 50% rented affordable homes, in future the requirement would be 25% First Homes, 25% other low costs home ownership products (such as shared ownership) and 50% rented. Where a Local Plan requires 25% or less of affordable homes to be low cost home ownership then all of these would be First Homes and the remaining 75% could be rented affordable homes.

2.5 In North Norfolk, our current Core Strategy reflects the need for genuinely affordable homes and requires that 80% of affordable homes should be rented. In the emerging Local Plan policy HOU2 has been amended to reflect proposals in this consultation paper and requires 25% of affordable homes as low cost home ownership – effectively this would mean all of these would be First Homes.

2.6 The current consultation does not seek further views on the principle of First Homes but asks questions around detailed implementation:

Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):

- i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.**
- ii) Negotiation between a local authority and developer.**
- iii) Other (please specify)**

NNDC favours i). This would help ensure delivery of the more genuinely affordable rented homes needed in the district and give greater clarity to developers (knowing that the requirement was for 75% rented affordable homes).

2.7 Currently, sites that provide solely for: Build to Rent homes, specialist accommodation for those with specific needs (e.g. the elderly), self-build or wholly affordable housing; are exempt from requirements to deliver affordable home ownership products. There have been no Build to Rent proposals brought forward in North Norfolk but arguably, even homes at full market rent may be more affordable for local households than any form of low cost home ownership. Equally the preference would be for rented homes on wholly affordable schemes. The government is considering how to implement these current exemptions with regards to First Homes:

Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?

Yes, rented homes are preferable to low cost home ownership products as more affordable in high property value areas

Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.

Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.

No

2.8 Transitional arrangements are being proposed to allow local plan reviews to set the tenure mix for other forms of affordable housing. As stated above, our current requirement for low cost home ownership is below the minimum 25% of First Homes and our proposed policy HOU2 is in line with this, these arrangements would not be relevant for NNDC.

Q12: Do you agree with the proposed approach to transitional arrangements set out above?

Yes

2.9 The government proposes that First Homes would, like other forms of affordable housing, be exempt from Community Infrastructure Levy (more far reaching proposals in the White Paper Planning for the future will review CIL and s106). As NNDC does not use CIL this is not relevant to us currently.

2.9 The National Policy Planning Framework 2018 introduced the idea of entry-level exception sites, exception sites that only require that any form of affordable homes are provided – including Starter Homes / other discounted market homes. These are sites which are not allocated and outside settlement boundaries BUT not in designated rural areas, where delivery will continue to be through the rural exception sites policy – which covers the majority of North Norfolk. Entry level exception schemes currently have a size threshold of one hectare or no increase above 5% of the size of the existing settlement. The proposals in this consultation paper would specify that the affordable homes delivered on entry-level exception schemes should be First Homes for local, first-time buyers. This would be an improvement from the ‘loose’ definition of affordable that currently applies to these potential sites and would guarantee that if any of these sites did come forward in North Norfolk homes would be discounted by 40-50% (subject to local evidence justifying this size of discount). However, the current proposals also allow for some market homes on entry-level exception schemes to ensure they are viable. The proposals also remove the size threshold of 1 hectare for entry level exception sites (but not the 5% increase cap).

Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?

No, entry level exception sites should be an “exception” to normal planning policy and as such should not effectively replicate market schemes, but should deliver wholly affordable homes, even if all of these are First Homes.

Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?

No, the size thresholds helps protect areas on the edges of our towns – for example a 5% cap would still allow a development of 150 homes on the edge of a town with a population of 3,000.

Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas? Please see question 35 for any comments relating to the Public Sector Equality Duty and the delivery of First Homes.

Yes, rural exception schemes are the route for a significant proportion of the delivery of affordable homes in North Norfolk. We wish to ‘protect’ genuine affordable rural exception schemes from what may be more attractive and more viable entry level exceptions schemes.

Section 3

Raising Affordable Housing Site Size Thresholds

3.1 There has been a significant decline in the number of SME builders in the last few decades, with large national developers dominating the sector. To support SME builders as the economy recovers from the impact of Covid-19; the government proposes temporarily lifting the site size threshold, below which developers do not need to contribute to affordable housing, to up to 40 or 50 units.

3.2 Currently planning policy sets this threshold at 10 units (or 5 in designated rural areas). Any sites above this threshold should deliver a proportion of homes, determined locally, as affordable (unless they can prove it is not viable to do so). The government recognises the impact increasing this threshold is likely to have on the delivery of affordable homes. In the consultation paper they assess

that nationally a threshold increase to 40 units would result in a likely reduction of 7-14% of section 106 affordable housing each year. For a threshold of up to 50 units, this would be between 10% and 20%. National policy currently sets out a site size threshold in addition to the number of homes, with no affordable housing contributions on sites smaller than 0.5 hectares. Government proposes to scale up the site size threshold at the same proportion as the increase in number of homes threshold.

3.3 Despite the potential impact on the delivery of affordable homes, the government still proposes to introduce the measure for an initial period of 18 months during which it will monitor the impact before reviewing the approach. There will be powers for local planning authorities to prevent developers bringing sites forward in phases of 40-50 to avoid affordable housing contributions.

3.4 Of key importance to North Norfolk is that designated rural areas would be excluded from the threshold increase. Most of North Norfolk, apart from the towns with a population of 3,000 or more, is a designated rural area so this proposal would have limited impact for us. Of the 26 sites so far proposed for allocation in the emerging Local Plan, 12 are for fewer than 50 dwellings - but of the 12 around half are in a designated rural area.

3.5 Another factor is that this threshold increase is currently being proposed as a temporary relaxation so would not change Local Plan policy requirements. In reality it is doubtful that many new developments would come forward within such a tight temporary period. There is no evidence that relaxing thresholds will actually deliver development any quicker and all this relaxation might achieve is greater profit margins for developers.

3.6 However, even if the impacts might be modest, any impacts on the delivery of affordable homes should be resisted as a matter of principle given the high needs and low provision.

Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?

No. Delivery of affordable housing through planning gain is vital to the overall supply of new, badly needed affordable homes. Any relaxation, even temporary by the government's own figures could significantly reduce the supply of new affordable homes.

Q18: What is the appropriate level of small sites threshold?

i) Up to 40 homes ii) Up to 50 homes iii) Other (please specify)

See answer to Q17 - No increase in threshold should be allowed.

Q19: Do you agree with the proposed approach to the site size threshold?

See answer to Q17 - No increase in threshold should be allowed

Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?

If any increase in threshold is to be implemented this needs to give clarity to the industry and a clear time limit, the idea of "linked to economic recovery" leaves uncertainty, a short specific period should be specified.

Q21: Do you agree with the proposed approach to minimising threshold effects?

Yes, larger developers may seek to bring sites through in phases to avoid affordable housing contributions and this should be prevented.

Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?

Yes, smaller sites are of greater importance to delivery of affordable housing in rural areas and developer contributions are a key element of delivering these homes. In the last 2-years 67 of 186 (36%) of new affordable homes were delivered through s106 developer contributions.

Section 4

Permissions in Principle

4.1 Permissions in Principle are a form of application which allows local authorities to determine if *some* impacts of specific types of development proposal are likely to be acceptable before they proceed. Unlike formal planning applications the land use matters which can be considered under this process are confined to specified matters of detail rather than the 'in principle decision' about the type of development proposed. Currently, the Permission in Principle consenting route is only available for residential sites included on Local Authority Brownfield Registers and for small residential schemes of less than ten dwellings. If a site secures Permission in Principle it is not necessary to secure Outline Planning permission but it would still be a requirement to secure a separate detailed approval before development could proceed.

4.2 The consultation is seeking views on extending the Permission in Principle option to a much wider range of development proposals including housing schemes of up to 150 dwellings and many smaller commercial proposals. Proposals requiring EIA or Habitat Regulation Assessment would not benefit from these provisions.

4.3 Government is particularly keen to grant automatic Permissions in Principle for those sites allocated for residential developments in Local Plans and argues that in allocating such sites the Local Authority has already agreed that the principle of development is acceptable. However, the current process of allocating sites in Local Plans is subject to the later grant of planning permissions with those permissions providing the vehicle for requirements in allocations policies to be met. Compliance with these policy requirements will go to the heart of the acceptability of any given proposal. The existing Outline Planning Permission process also provides an essential opportunity to impose conditions and enter into legal agreements (section 106) which can deal with a range of matters not envisaged as being considered under the Permission in Principle route. These conditions and agreements render an unacceptable proposal acceptable. Without the opportunity to consider these details via a formal planning application it is difficult to see how such matters would be addressed.

4.4 To date there has been very little take up of the Permission in Principle options which are already available and there would appear to be little appetite for this in the development industry, perhaps reflecting that the process adds limited value particularly for larger complex proposals.

Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?

No, North Norfolk does not agree with proposals to extend the Permission in Principle route to Major Developments. Major developments, by definition are those which can have

significant impacts (positive and negative) on communities. Permission in Principle does not provide an appropriate mechanism to consider important matters which go to the heart of the acceptability of the proposal at a point in the approval process when consideration of such matters is critical.

The Council is unaware of any evidence that these processes have speeded up the delivery of development or importantly improved the quality of planning outcomes. Neither would there appear to be much appetite for this approach from the development industry perhaps because the process does not provide the degree of certainty or remove risk. For those sites already allocated in Local Plans it is not clear what further value a PIP provides.

The Council is opposed to proposals which diminish the opportunities for meaningful public engagement in relation to all land use issues, not just a limited selection, at the point in the consenting process when it is often the most important.

Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.

For the reasons outlined in our response to question 24 the Council does not support the extension of Permissions in Principle to a wider range of developments than is already available.