Submitted by online form

7 January 2019

Re: Planning reform: supporting the high street and increasing the delivery of new homes

Dear Madam/Sir,

We understand and recognise that government's objective is to "support the creation of new businesses and homes" and "give greater certainty and speed wherever possible." However, providing *certainty* of outcome with regards to giving permission for development to take place should not come at the cost of the opportunity to consider wider factors which affect the appropriateness and sustainability of the proposed development, and which are factors that the planning application process is designed to address and resolve. Permitted development should therefore be used where decision-making is unlikely to raise any objections and therefore adds unnecessary burden to the process of administration. Exclusions and exemptions for such things as designated heritage assets are part of this process.

However, in many instances in this consultation, the potential for harm to be caused by the type of proposed development is not adequately considered. The foreword states that Government wants to "make the most effective use of existing buildings" but fundamentally takes a narrow view on what this means to the potential detriment of the built environment. Far from being a way to "improve our streetscapes", as suggested, these collected proposals contain significant risk of harm to our streetscapes, and heritage assets and their settings, to views, and to structures, and harm to our ability to gain knowledge and understanding of our pasts from buried archaeology.

Our comments set out these concerns in the context of the specific policies proposed. CIfA supports Government's continuing desire to produce a simplified, fit for purpose planning system. However, in our view, an effective planning system is one where the management and protection of the historic environment is part of the solution and not considered part of the problem, and which contributes to sustainable development. This is particularly important for the majority of heritage assets with archaeological interest which are undesignated (including those which are of demonstrable equivalence as designated sites and therefore of national importance) and whose only protection comes from the planning regime.

Part 1. Permitted development rights and use classes

Chartered Institute for Archaeologists, Power Steele Building, Whiteknights Road, Reading RG6 6DE
T: +44 118 966 2841 | admin@archaeologists.net | www.archaeologists.net

Question 1.1: Do you agree that there should be a new permitted development right to allow shops (A1) financial and professional services (A2), hot food takeaways (A5), betting shops, pay day loan shop and launderettes to change to office use (B1)? Please give your reasons.

This proposal to extend PD rights to include change of use to office use B1 has the potential to harm heritage buildings and wider streetscapes, as well as the vitality of local high streets. Positive place-making in town centres relies upon the ability of planning officers to interpret the value of streetscapes and create and implement appropriate guidelines for development. We believe that the proposed permitted development rights would be detrimental to historic high streets in a number of ways;

- This permitted development right would allow conversion even to thriving high streets.

- Historic shop details would be lost in such conversions, and there would be fewer controls on the quality and appropriateness of any redevelopment.

- This proposal does not allow for the local decision to be made on where to support high street redevelopment as office or residential and where to support local shops and related high street facilities and regeneration.

CIfA feels that it would be more appropriate to pursue locally-structured local and/or neighbourhood development orders, backed by strong encouragement in Local Plans, for appropriate change of use on the high street.

If this extension to permitted development is granted, it will be necessary to ensure strong prior approval processes which will be able to consider whether change of use is undesirable in relation to its design and visual impact and its impact on the provision of retail services and sustainability of a key shopping area.

Question 1.2: Do you agree that there should be a new permitted development right to allow hot food takeaways (A5) to change to residential use (C3)? Please give your reasons.

This proposed PD right, like those permitting the conversion of A1, A2, A3, and A4 to C3, does not do enough to ensure that there would be no detrimental impact on historic detailing of shop fronts. Local authorities and communities are already empowered through local and neighbourhood plans to encourage appropriate change to retail streets where there is decline or where adverse economic pressures are felt. A blanket national permitted development right would limit the ability of local authorities and communities to take strategic action to encourage retail or heritage-led regeneration and to prevent change of use where such conversion would be detrimental to the individual building, streetscape, or wider prospects for regeneration of a high street or area.

Question 1.3: Are there any specific matters that should be considered for prior approval to change to office use?

Yes. The appropriateness of change of use, the impact on historic shop fronts, and the impact on historic streetscapes and area character should be considered for prior approval.

Question 1.4: Do you agree that the permitted development right for the temporary change of use of the premises listed in paragraph 1.9 should allow change to a public library, exhibition hall, museum, clinic or health centre?

Yes, subject to similar considerations at prior approval as outlined above.

Question 1.5: Are there other community uses to which temporary change of use should be allowed?

No comment.

Question 1.6: Do you agree that the temporary change of use should be extended from 2 years to 3 years?

No comment.

Question 1.7: Would changes to certain of the A use classes be helpful in supporting high streets?

No comment.

Question 1.8: If so, which would be the most suitable approach: a. that the A1 use class should be simplified to ensure it captures current and future retail models; or, b. that the A1, A2 and A3 use classes should be merged to create a single use class? Please give your reasons.

No comment.

Question 1.9: Do you think there is a role for a permitted development right to provide additional self-contained homes by extending certain premises upwards?

No. While upwards extension of buildings in appropriate contexts provides a reasonable route to the creation of new homes, we do not believe that a national permitted development right is an effective way to deliver on this potential.

Our concerns relate to the application of blanket permitted development right as a way to reduce perceived inflexibility and delay caused by the planning system. We dispute the validity of this argument and suggest that there are, generally, more sensitive and locally appropriate ways to encourage development through planning policies, for instance, through local and/or neighbourhood development orders, backed by strong encouragement in Local Plans.

Permitted development also limits many of the precautionary mechanisms which are available to ensure that the archaeological interest of heritage assets can be investigated. Any proposals which removes opportunities for local authorities to properly detect and assess the archaeological potential of a building or site thus potentially leading to the loss of, or harm to, archaeological interest must be seen as a contravention of the National Planning Policy

Framework's (NPPF) tests for sustainable development and a diminution of historic environment protections.

There are alternative options which would open the possibility of successfully balancing proportionate planning protections with the desire to encourage and enable higher rates of upwards extensions in appropriate areas. Building upwards has, historically, been a characteristic of the development of towns as they naturally grow and develop a city-scale landscape. Many of these changes are already evident in London and elsewhere. However, it is important that such development occurs in the light of proper assessment of the appropriateness of such to the character of an area. In this regard, we are particularly concerned about the historic and wider context which the built environment provides for high quality change which preserves or enhances the existing qualities of the place.

CIfA therefore supports the proposals for locally-structured local and/or neighbourhood development orders, backed by strong encouragement in Local Plans, for appropriate upwards extensions. This would ensure that upward extensions are only subject to permitted development away from areas of specific sensitivities (e.g. high streets, parks and gardens, and conservation areas) and that any other upwards extensions will be able to seek planning permission, with a strong encouragement for any permission to be granted subject to conditions assuring suitable protections, as provided in Local Plans.

We believe this could form a workable programme of encouragement to build in a way which will satisfy NPPF's tests of sustainable development and protections for the historic environment and the character and amenity of the landscape.

We are pleased to see robust exclusions for listed buildings and scheduled monuments. However, the importance of the setting of designated assets and of significant views to and from heritage assets are not mentioned. We support a requirement for planning permission for all upward extensions in conservation areas, unless particular conservation areas are judged individually to be particularly appropriate for upwards extensions, without harm to significance or character – in which case, could be subject to a local or neighbourhood development order.

Question 1.10: Do you think there is a role for local design codes to improve outcomes from the application of the proposed right?

Yes, but design codes are not sufficient to ensure that development is actually delivered to a high standard where there is no requirement to obtain planning permission. They are not sufficient to ensure well-designed homes which enhance the streetscape.

Question 1.11: Which is the more suitable approach to a new permitted development right:

a. that it allows premises to extend up to the roofline of the highest building in a terrace; or

b. that it allows building up to the prevailing roof height in the locality?

CIfA considers that that limitations and conditions envisaged in relation to the extended rights are not sufficient to prevent an unacceptable risk to the historic environment and our understanding of its significance.

This concern is particularly keenly felt due to the lack of detail in the consultation document which means that it is difficult to know whether either process would be – or even could be – appropriately protected. Option b would require local guidelines which would take into account different character areas and as and such would impose significant burden on local authorities, or, more likely, would result in generalised guidelines on prevailing roof lines which could lead to inappropriate levels of upward development in some areas or legal challenges resulting from refusal to grant prior approval.

More complex requirements for the appropriate treatment of boundaries (e.g. chimneys) would also be required.

Question 1.12: Do you agree that there should be an overall limit of no more than 5 storeys above ground level once extended?

No. Maximum appropriate height for upwards extensions will vary depending upon the area. A national limit of 5 storeys makes little sense and is another reason why a national permitted development right is not the right option to encourage appropriate upwards extensions.

Question 1.13: How do you think a permitted development right should address the impact where the ground is not level?

No comment.

Question 1.14: Do you agree that, separately, there should be a right for additional storeys on purpose built free standing blocks of flats? If so, how many storeys should be allowed?

Upwards extensions of already tall buildings will have impacts on setting and views. Given the nature and scale of this type of development we think it is entirely appropriate for such a development to require planning permission.

Question 1.15: Do you agree that the premises in paragraph 1.21 would be suitable to include in a permitted development right to extend upwards to create additional new homes?

As previously stated, we think that the decision of what premises would be appropriate for upwards extension should be made locally. There will be situations where all the classes listed in 1.21 will be appropriate, but none can be stated to be suitable for inclusion in a blanket national PD right.

Question 1.16: Are there other types of premises, such as those in paragraph 1.22 that would be suitable to include in a permitted development right to extend upwards to create additional new homes?

No comment.

Question 1.17: Do you agree that a permitted development right should allow the local authority to consider the extent of the works proposed?

Yes.

Question 1.18: Do you agree that in managing the impact of the proposal, the matters set out in paragraphs 1.25 -1.27 should be considered in a prior approval?

Yes. We strongly support these prior approval mechanisms, but generally do not believe that prior approval is a satisfactory replacement for planning permission. For example, the inclusion of the list of considerations under paragraph 1.26 (design, siting, appearance, impact on amenity and character, form of neighbouring properties, good design, overall quality, etc.) is precisely what we would expect to be considered through a regular planning application. We therefore question the extent to which these processes would be sufficient given that there will be a greater presumption in favour of development and that the fee from the applicant will be smaller and therefore not cover the same level of assessment.

As we have said elsewhere, a system of local and/or neighbourhood development orders would be a more suitable policy solution, as areas which were inappropriate for upwards extensions due to impact on character, etc., could be clearly avoided, focussing only on areas where applicants would have assurance that their proposals would be permissible in principle.

Question 1.19: Are there any other planning matters that should be considered?

No comment.

Question 1.20: Should a permitted development right also allow for the upward extension of a dwelling for the enlargement of an existing home? If so, what considerations should apply?

As we have stated previously, permitted development is an acceptable tool in planning where it removes unnecessary bureaucratic or administrative burdens from the process. We do not believe that the protections provided by the requirement to seek planning permission are unnecessary in this case and so we do not support the extension of the PD right as proposed.

This additional proposal for a PD right for enlargement of existing homes is no different to the proposal to allow a blanket PD right for upwards extensions for the creation of separate dwellinghouses, other than that it does not also meet the stated aim to create more homes, which is the major rationale for the public benefit of such a right. We therefore think that this proposal would be subject to the same concerns but have fewer benefits, and therefore do not support it.

While the detail in this document is light, CIfA does not consider that that limitations and conditions envisaged in relation to the extended rights are sufficient to prevent an unacceptable risk to the historic environment and our understanding of its significance.

Question 1.21: Do you agree that the permitted development right for public call boxes (telephone kiosks) should be removed?

Yes.

Question 1.22: Do you agree that deemed consent which allows an advertisement to be placed on a single side of a telephone kiosk should be removed?

Yes.

Question 1.23: Do you agree the proposed increased height limit for an electrical vehicle charging point upstand in an off-street parking space that is not within the curtilage of a dwellinghouse?

No comment.

Question 1.24: Do you agree that the existing time-limited permitted development right for change of use from storage or distribution to residential is made permanent?

No. While the existing right does not apply to listed buildings and scheduled monuments, nor with category 2(3) land, other historic buildings could be harmed as a result of this PD right. In many cases it will be permissible in principle to convert a non-designated (or indeed, designated) historic industrial building to residential use, but this process is best considered by applying for planning permission (and Listed Building Consent in the case of listed or curtilage listed buildings). This is because in the absence of a planning application, there is no opportunity to consider fully the potential impact of proposed development on the historic environment, including the setting of nearby designated assets.

The proposal to allow change of use from storage or distribution to residential, and in particular the proposed introduction of a permitted development right that would allow the demolition of commercial buildings and the redevelopment of the site as residential, would allow a significant intensification of development involving a greater below ground impact from foundations, services, access arrangements and other essential additions. This would mean a potential for serious adverse impacts on undesignated below ground archaeological remains.

CIfA does not consider that that limitations and conditions envisaged in relation to the extended rights are sufficient to prevent an unacceptable risk to the historic environment and our understanding of its significance.

Question 1.25: Do you agree that the time-limited permitted development right for larger extensions to dwellinghouses is made permanent?

No. We have a general concern about the extension of PD rights since, in the absence of a planning application, there is no opportunity to consider fully the potential impact of proposed development on the historic environment. This is particularly relevant to this proposal due to its potential to impact on areas of known below ground archaeological interest and upon which there is residential housing. We raised these concerns when the temporary PD right for larger extensions to dwellinghouses was proposed in 2014.

Many town and villages are situated on older settlement sites, of medieval, Anglo-Saxon and/or Roman origin. In these often intensively used urban and sub-urban areas the implications of development on below ground archaeological remains needs to be assessed and, if there is adverse impact, needs to be mitigated. In most cases this will be by archaeological investigation and recording. Recent survey work has identified examples where proposed extensions have been reduced in size to the permitted development threshold in order to avoid addressing the archaeological implications of house extensions.

The sites/areas are characterised by the discovery of archaeological remains (including human remains) before or during small-scale, notifiable developments, mostly house extensions. Some of these sites/areas within this category are immediately adjacent to the boundaries of Scheduled Monuments. In almost all instances where archaeological potential is identified within such sites/areas by the local planning authority, planning permission is granted with a condition to require appropriate archaeological investigation in accordance with the National Planning Policy Framework and local planning policy.

This is an issue which will only arise in certain areas and, in most cases, would not prevent development. However, these areas are not currently protected by formal historic environment designation (Conservation Area, Scheduled Monument, Listed Building, Registered Park or Garden) and significant damage is therefore likely to occur if the ability to investigate, record and increase our understanding of the past through the provisions of the current planning system (NPPF) were lost or compromised.

We can provide examples which show that significant archaeological discoveries rely on the planning application process. The current temporary permitted development right for larger extensions will have caused unquantifiable damage to the historic environment and limited our understanding of the past. We believe that this is an unacceptable risk and one which undermines the NPPF's requirement to maintain or enhance the historic environment.

There are regulatory mechanisms which can mitigate these concerns that exist within the current planning system and other statutory provisions. These include

- designating known heritage assets in these areas as Scheduled Monuments (Scheduling) under Part I of the Ancient Monuments and Archaeological Areas Act 1979. However, there are more proportionate alternatives to the large-scale national designation of assets that this would entail.
- using 'sites of archaeological interest' as defined in the article 1(2) of the Town and Country Planning (General Permitted Development) Order 1995 (GPDO) as the basis (possibly subject to additional criteria) for excluding land from the benefit of the permitted development rights in question or requiring prior approval for their exercise. This is an approach increasingly adopted to the protection of archaeological interests in the permitted development regime in Scotland.
- using 'Areas of Archaeological Importance' as defined in Part II, section 33 of the Ancient Monuments and Archaeological Areas Act 1979 to exclude such areas from the benefit of the permitted development rights in question. Currently, Areas of Archaeological Importance (AAIs) have only been designated by the Secretary of State in five historic town centres (York, Chester, Exeter, Hereford and Canterbury). However,

the 1979 Act gives local authorities (and Historic England as successor to the Royal Commission in Greater London) the power to designate AAIs.

- using the mechanisms in Part II of the 1979 Act (without excluding the areas in question from permitted development rights) to allow investigation, recording and enhancement of public knowledge in newly designated AAIs in advance of development. Those mechanisms might need to be adapted to reflect current conditions (for instance, with regard to the role of the investigating authority), but one of the major benefits of AAI designation to date has been the facilitation of development by statutory undertakers in pursuance of permitted development rights (and the associated benefits for the historic environment). However, without steps to ensure that further AAIs are designated, any solution involving AAIs would be theoretical rather than real.
- using Article 4 directions to exclude specific areas from the benefit of permitted development rights on grounds of archaeological impact. However, local authorities are often reluctant to issue Article 4 directions viewing them as costly, cumbersome and time-consuming. There have been very few, if any, Article 4 directions on archaeological grounds and we would be concerned if this were to be adopted as the answer to this problem without any steps to ensure that Article 4 directions would actually be made in appropriate cases.

In conclusion, CIfA does not consider that that limitations and conditions envisaged in relation to the extended rights are sufficient to prevent an unacceptable risk to the historic environment and our understanding of its significance. However, if the right is made permanent we recommend that guidance is issued to local authorities to ensure that areas of know high archaeological interest are made subject to article 4 directions to exclude them from the benefit of permitted development.

Question 1.26: Do you agree that a fee should be charged for a prior approval application for a larger extension to a dwellinghouse?

Yes. Government acknowledges the underfunding of planning departments and the consequent impact upon the speed and quality of decision-making is well document from the planning sector from recent consultations. We consider that planning fees are a wholly appropriate measure to ensure that planning services can function correctly and that these should be proportionate to the scale of work required to process and consider an application, including for prior approval.

Question 1.27: Do you support a permitted development right for the high quality redevelopment of commercial sites, including demolition and replacement build as residential, which retained the existing developer contributions?

No. A permitted development right of this nature would have the potential to substantially alter the character of the built environment, particularly in sensitive areas such as post-industrial towns where industrial and commercial heritage buildings provide important contribution to

local character and in which heritage-led regeneration is a proven successful strategy. It could also harm the setting of designated heritage assets.

A permitted development right to demolish and replace such buildings would also substantially limit the ability of local authorities to develop regeneration programmes, for example through Heritage Action Zones.

We also reject the flawed argument that because there is an existing PD right for the conversion of commercial buildings to residential, that this ought to be balanced with a PD right for demolition and replacement on the grounds that developers should be enabled to pursue the option of greatest density of housing.

The significance of the potential scale of this proposed permitted development right is recognised in the consultation document, which notes that 'this would expand the current scope of permitted development…'. We see this as a slippery slope, with the power vested in the planning process being eroded, undermining the need for balanced, considered and democratic decision-making. If introduced, this extension in PD rights would allow radical change and intensification in the use of land, with a range of potential implications for local infrastructure and the provision of services, as well as for the local historic environment. We argue strongly that the redevelopment of such sites should remain the proper subject of the planning application system which allows all of these issues to be assessed and considered in accordance with the policies of the NPPF.

Converting an historic commercial or industrial building into residential is always likely to be less harmful to the historic environment and local character that demolition and replacement. It would be much more harmful to allow developers to demolish and replace such buildings which are capable of conversion and which have historical or archaeological interest. Demolition and replacement of old buildings is also massively more energy intensive, making this option far less environmentally sustainable.

A new PD right as proposed would create a massive new incentive for developers to opt for the more damaging and less environmentally sustainable option. Developers who believe that there is a case for greater density of housing and that this benefit offsets harm to the historic environment are able to apply for planning permission.

CIfA does not consider that that limitations and conditions envisaged in relation to the extended rights are sufficient to prevent an unacceptable risk to the historic environment and our understanding of its significance.

Question 1.28: What considerations would be important in framing any future right for the demolition of commercial buildings and their redevelopment as residential to ensure that it brings the most sites forward for redevelopment?

We fully agree that encouragement to bring forward sites for redevelopment should be an aspiration of the planning system. However, we disagree that there is evidence to suggest that national permitted development rights are the best way to do this.

Local authorities must retain the ability to refuse proposals which are deemed to be unsustainable, for example, if they cause harm to the historic environment which could be avoided or mitigated. Any permitted development right which allows the demolition of existing buildings and replacement would remove this ability and would almost certainly lead to a diminution of avenues for positive place-making and would make it less likely that local efforts to pursue heritage-led regeneration or enhance local character would be explored with developers.

Question 1.29: Do you have any comments on the impact of any of the measures? i. Allow greater change of use to support high streets to adapt and diversify ii. Introducing a new right to extend existing buildings upwards to create additional new homes iii. Removing permitted development rights and advertisement consent in respect of public call boxes (telephone kiosks). iv. Increasing the height limits for electric vehicle charging points in off-street parking spaces v. Making permanent the right for the change of use from storage to residential vi. Making permanent the right for larger extensions to dwellinghouses

The planning system is central to the management and protection of the historic environment and provides the only effective protection for many heritage assets with archaeological interest. Much of the archaeological resource is undesignated and its precise nature and extent (and in some cases, even its existence) can be unknown prior to the consideration of development proposals.

Archaeology has been recognised as a material consideration in the planning process since the 1970s. Building on the foundation provided by early precedent setting cases such as Hoveringham Gravels, planning policy has been developed over the years to define heritage assets (which are not dependent upon designation), significance and, archaeological interest and to provide decision-makers with a coherent framework for consideration of the impact of development upon the significance of heritage assets with archaeological interest.

That framework generally remains fit for purpose. Moving complex development issues into the realm of permitted development will not assist in the streamlining of the planning process or delivery of development. The continuing, wholesale, extension of permitted development rights is removing an increasingly large amount of development from the scrutiny that accompanies a planning application.

At present, much permitted development is small-scale and unobjectionable; that it can be, and often is, subject to general conditions and exclusions and will not override EIA requirements is also positive. However, the continued and deepening expansion of these rights such as are represented in this consultation increased the real scope for significant loss or damage to nationally important but undesignated archaeological remains and wider damage to the historic environment generally.

We would also like to highlight a lack of sufficient detail on where the proposed permitted development rights would not apply. The document does not, for example, include exemption for Scheduled Monuments, which should always be included in exemptions. Futhermore, we would also welcome the explicit inclusion of non-designated sites of demonstrably equivalent

significance to scheduled sites (as defined in footnote 63 of the NPPF) in the exemptions to the proposed permitted development rights. Finally, there is no reference to the setting of listed buildings is also absent from the description of exemptions, which should be included as reason for rejection of prior approval.

Question 1.30: Do you have any views about the implications of our proposed changes on people with protected characteristics as defined in the Equality Act 2010? What evidence do you have on these matters? Is there anything that could be done to mitigate any impact identified?

No comment.

Part 2. Disposal of local authority land

Question 2.1: Do you think that the threshold for the existing general consent for the disposal of land held for purposes other than planning or housing at undervalue (under section 123 of the Local Government Act 1972) should: a. remain at the current level? b. be increased? c. be removed completely? Please give your reasons.

No comment.

Question 2.2: If you consider it should be increased, do you think the new threshold should be: a. £5 million or less? b. £10 million or less? c. other threshold? (please state level) Please give your reasons.

No comment.

Question 2.3: Do you agree that the Secretary of State should issue a new general consent under section 233 of the Town and Country Planning Act 1990 for the disposal of land held for planning purposes? Please give your reasons.

No comment.

Question 2.4: If yes, do you think any new general consent should apply to: a. disposals at an undervalue of £2 million or less? b. disposals at an undervalue of £5 million or less? c. disposals at an undervalue of £10 million or less? d. disposals at some other undervalue threshold? (please state level) e. all disposals regardless of the undervalue? Please give your reasons.

No comment.

Question 2.5: Do you agree that the economic, social or environmental well-being criteria which apply to the existing general consent should also apply to any new general consent for the disposal of land held for planning purposes?

No comment.

Question 2.6: Do you have any additional comments about the current system governing disposals of land at an undervalue by local authorities and our proposals to amend it?

No comment.

Question 2.7: Do you consider that the current £10m threshold contained in the general consent governing disposals by the Greater London Authority remains appropriate? Please give your reasons.

No comment.

Question 2.8: If you consider the current threshold is no longer appropriate, or that the limit should be removed completely, please specify what you think the alternative should be and give reasons.

No comment.

Question 2.9: Do you have any views about the implications of our proposed changes on people with protected characteristics as defined in the Equality Act 2010? What evidence do you have on these matters? Is there anything that could be done to mitigate any impact identified?

No comment.

Part 3. Canal & River Trust: Draft listed building consent order

Question 3.1: Do you agree that the types of work set out in paragraph 3.8 should be granted a general listed building consent? Please give your reasons.

Yes. We generally support this proposal, subject to proper safeguards and checks. Part of the reason why we are not concerned about the proposals is because we know that the Canal and Rivers Trust have conservation specialists who are qualified and capable to undertake assessment work on development proposed to fall under the LCBO. There will be cases where organisations applying for LCBOs are less well equipped to work to uphold necessary safeguards.

Question 3.2: Do you agree that the safeguards included in the order are appropriate? Please give your reasons.

Question 3.3: Do you consider that any additional safeguards are required? Please provide details

Question 3.4: Do you have any views about the implications of our proposed changes on people with protected characteristics as defined in the Equality Act 2010? What evidence do you have on these matters? Is there anything that could be done to mitigate any impact identified?

No comment.

Part 4. Part New town development corporations: Draft compulsory purchase guidance

Question 4.1: Do you have any comments on the draft guidance at Annex D?

No comment.

4.2: Do you have any views about the implications of the proposed guidance on people with protected characteristics as defined in the Equality Act 2010? What evidence do you have on these matters? Is there anything that could be done to mitigate any impact identified?

No comment.

Yours sincerely,

Rob Lennox
BSc (Econ) MA PhD ACIfA MCIPR
Policy and Communications Advisor, CIfA