

White Paper: Planning for the future - October 2020

Response from New Forest District Council

Sent to: planningforthefuture@communities.gov.uk

General comments

The Council welcomes the Government's recognition of the important role that Planning and Local Planning Authorities have in shaping the future of our communities.

However, many of the proposals as set out will not deliver the more streamlined process the Government desires, and that in attempting to do so protections to the environment may be eroded and the quality of new development diminished.

The key driver for the 'reforms' is clearly housing delivery. There is a failure to adequately recognise the other challenges that an effective planning system should consider. Planning has a key role to play in delivering the Government's ambitions in relation to climate change and sustainability. The White Paper has little to offer in these areas of policy.

This Council does not accept the notion that it is the planning system that is responsible for the failure to deliver increased housebuilding. Previous Conservative governments have recognised that the housing market is 'broken'. (2017 White Paper: Fixing our broken housing market). This White Paper fails to address these continuing underlying structural issues in the country's housing market, which (major) tinkering with the planning system has not and will not address.

The White Paper reduces 'Planning' of our communities to a mechanical / administrative process.

In the main, the changes set out will reduce the ability for local people to influence the planning of their area. The processes set out will significantly reduce the opportunities for participation in the planning process by both democratically elected representatives and by the general public.

Overall, while successfully identifying some of the problems with the current planning system, the White Paper fails to put forward 'solutions' that are either coherent or likely to be effective in meeting the White Paper's own objectives.

Response to questions

Pillar One – Planning for development

Overview

1. What three words do you associate most with the planning system in England?

2. Do you get involved with planning decisions in your local area?

2(a). If no, why not?

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

4. What are your top three priorities for planning in your local area?

Addressing local needs (housing, employment, physical and social infrastructure)

Enabling healthy and sustainable lifestyles

Protecting and enhancing the natural and built environment

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

5. Do you agree that Local Plans should be simplified in line with our proposals?

No.

In principle the objective of simplifying the planning process is welcomed. This has been a key objective in Government proposals for reform of the system over many years. Simplification as an objective has never been achieved and continuous change to the planning system has contributed to a system driven by process rather than outcomes.

The current Local Plan system already, in effect, identifies areas for growth, areas for renewal and areas for protection. Very little detail is given in the White Paper but the emphasis is on ‘rules’ and ‘processes’ to be applied when ‘planning’ in each of the three ‘types of land.’ Having just three areas would be overly simplistic.

There is a significant conflict between the White Paper’s statement that the reforms will “democratise the planning process by putting a new emphasis on engagement at the plan-making stage” and its proposals to impose a binding housing requirement on local authorities and only require public engagement in the development plan-making process at an early state (a stage where there will be nothing to respond to). Those involved in delivering the current planning system will be aware that it is the ability to genuinely have a say and influence the planning of their area that is valued most by local communities.

The lack of local context and interpretation in the simplified Local Plan will make it harder for the local community, developers and other stakeholders to understand local issues and circumstances.

There is the potential for a simplified Local Plan to lose the overarching scene setting and strategic place-making role. The proposals could result in a fragmentation of the local plan to a series of links and signposts (to a variety of national policies, data and guidance) and therefore the cohesiveness of a Local Plan would be diminished.

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

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

There is a place for national development management policies and this has been working effectively through the NPPF. However, there is a need for local interpretation of policies contained in the NPPF. There will also be matters that are not of national importance but local issues that need to be addressed through local policies.

The Government should clearly establish what development management policies should be covered by standard national policies, for example, protection of listed buildings, energy efficiency standards for new buildings, and minimum space standards for dwellings. However, other policies, such as affordable housing site thresholds, and housing types and mix, should be set locally.

Local policies in an adopted development plan document enable local issues to be addressed, recognising that different parts of the country have different issues. These local policies are evidence-based and are subject to scrutiny at public examination. The proposed approach seems to be contrary to the Place Making Agenda the government suggests it's committed to. Further this approach could result in the loss of assets that play a significant role in the economy and the sense of place.

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

7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development” test, which would include consideration of environmental impact?

In practise the current system, now established, is working satisfactorily. It is unlikely the benefits to be gained by introducing a new approach will be outweighed by the uncertainty and the time taken to develop and implement a new 'test'.

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

While the 'Duty to Cooperate' was an ineffective replacement for regional or sub-regional planning, the White Paper's proposal to abolish it would be a retrograde step and is not supported by any evidence to justify it.

It would remove any form of planning or coordination above the district level which could lead to a series of disconnected local plans. This could be rectified by introducing a larger-scale strategic level of planning, which will be more effective in delivering sustainable growth over a wide area. The government needs to consider the main areas of cooperation between authorities and for South Hampshire these include:

- Unmet housing, employment and other needs.

- Cross boundary and larger scale infrastructure (largely but not exclusively transport).
- Environmental mitigation (including recreational distance and the impact of excessive nutrients on protected habitats).

Although not perfect, the existing Duty to Cooperate has helped to facilitate joint working on strategy and a common evidence base. It is important that the government considers the need for on-going collaboration as an integral part of the reforms. The revised standard method for assessing local housing need demonstrates why the duty to cooperate, or another mechanism, is essential to ensure housing delivery in the sub-region as housing needs will need to be considered across local authority boundaries. It is unclear how a further revised standard method will take account of land constraints or the need for land uses such as employment and open space.

There is interconnection between rural and urban areas and whichever way local government boundaries are drawn, there will always be close connections with surrounding areas, for example, in terms of commuting patterns, housing markets, business links and environmental connections. Cross boundary cooperation should still be undertaken on issues of common concern that extend beyond the boundary of individual local planning authorities and for data gathering and evidence base preparation that suitably reflects local circumstances.

The current approach of using an algorithm to determine where development should take place has resulted in poor spatial planning decisions across the country, including the need for significant land releases within Green Belts to 'make-up' housing numbers in a very environmentally constrained area. This Council has had to release Green Belt land to respond to a dramatic (250%, but potentially increasing to 500%) increase in the housing requirement of our planning area under the NPPF standardised methodology approach(es).

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

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

The current approach of the 'Standardised Methodology', in whatever form, is unsustainable, and has been particularly harmful for areas like New Forest District, which has seen its 'housing requirement' increase up to 5-fold (500%) under various versions of the Government imposed 'algorithm', in a district where 85% of the area is subject to environmental constraints, and where new development requires significant and costly mitigation measures to address the significant impacts that development has on protected nature conservation sites of international importance.

Strategic planning requires assessment and balancing of social, economic and environmental considerations with professional judgements being made to balance competing objectives. Recognition of social, economic and environmental constraints as part of the algorithm would be a welcome improvement if it was achievable. If the government intends to continue with this approach further consultation is invited to demonstrate an

algorithm that recognises these constraints. Further that there is a mechanism that balances the housing need with the need for employment land and green infrastructure.

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

No. Disagree in principle with a planning system that is led by the use of an algorithm in place of proper spatial planning.

Planning should be about positively shaping the future, not about entrenching and repeating past patterns of urban development without questioning their appropriateness.

As an example, there are clear indication that the current global pandemic will have a long term impact on how people choose to work, where they wish to live and the type of homes they will desire, Planning based simply on past trends will curtail the nation's ability to adapt and damage long-term international competitiveness in a global market place for attracting businesses and skilled personnel.

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

9(a). Do you agree that there should be automatic outline permission for areas for substantial development (areas) with faster routes for detailed consent?

No.

Under the current system a site allocation in an adopted Local Plan already establishes the principle of development. Many of the detailed issues relating to the delivery of development are unknown at planning-making stages under the current system. The proposed approach would require developers to do detailed work at Plan Making stage putting significant cost and delay into the planning making process for developers and local authorities. It is unrealistic to suggest that all detailed matters can be fully explored and adequately addressed as part of the plan-making without very significant additional resources put into plan-making and a much longer timetable for plan-preparation than suggested in the White Paper. The opportunities for community engagement are significantly reduced through the proposed approach leading to a far less democratic approach.

9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?

No.

Little thought has been given to the practicalities of implementing the system described. However, the system being suggested, with different administrative routes for seeking planning permission is complex and will be very confusing to the public. The inability for community involvement in decisions affecting them is concerning, particularly in renewal areas where the impact of proposals may be very significant on existing communities. People will not understand why they have no say in what happens in their area and in developments which may affect them directly. They will not understand that a consultation on a local plan several years before was their chances to have their say and influence development in their area.

The loss of the ability of the local planning authority to refuse planning permission for a poor and inadequate scheme is likely to have the effect of lowering development standards. . It will also erode the local community's confidence in the planning system and foster wider anti-development sentiments.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

The creation of new settlements/communities needs longer time horizons than the 10 to 15 year time horizons considered by Local Plans. The ability to plan strategically to longer time horizons needs to be re-established, re-establishing a role for regional /sub-regional spatial planning. The revised planning system envisaged in this White Paper has no measures in it to enable longer-term planning strategies to be developed which may deliver more sustainable patterns of development in the future. The 'new' system as set out will only deliver more of the same in the short time horizons it looks at.

The appropriate route delivery of new settlements should not be by using the Nationally Significant Infrastructure Projects regime. The allocation of new settlements should be dealt with through regional/sub regional planning with the creation of Development Agencies as delivery agencies, who are publicly accountable and driven by public interest should be considered as a preferable delivery vehicle.

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

10. Do you agree with our proposals to make decision-making faster and more certain?

In principle objectives of removing of un-necessary delays and improving the efficiencies in the planning system are welcomed. Increased digitalisation is welcomed providing there is funding to both provide the infrastructure and upskill staff and users of the service. Whilst the principle of reducing the amount of information as part of a planning application it remains the view that there is a need to fully consider the impact of development on an area. The issue of applications not be determined within deadlines is frequently due to poorly thought through proposals. In environmentally sensitive areas like New Forest District where many planning matters are extremely complex and where poor decision-making can have an adverse impact on the local environment and the quality of life of residents it is critical that what is being presented in an application is not over simplified. In all areas, the outcome and impact of the planning process and decisions will be with us for many years. It is better to get things right than to make poor decisions rapidly to a tick-box timetable.

Digital technology can only ever be a tool to drive a process and greater use is welcomed to enable time and skills to be used to deliver quality outcomes for communities. The greater use of digital technology should be the norm and should not need to be the subject of a White Paper.

The Council welcomes proposals to clarify the information that will be required to be submitted as part of a planning application, but considers the suggestion that this should be limited to a planning statement of 50 pages illustrates seems to not be reflective of the complexities of major development proposals. A one-size fits all approach is inappropriate.

All the information necessary for decision-making must be submitted, ideally at the time of registration of the planning application. Delays are often a result of failure to provide the necessary information as part of an application. The Council suggests there should be a requirement for a non-technical summary document to be submitted with all applications falling into the 'Major Development' category, summarising all key matters, to improve public understanding if they are enabled to be part of the process. This will not replace the need for appropriate technical data.

It is suggested that a more streamlined approach with firm deadlines should be trialled within the Planning Appeals system where direct Government oversight is possible and where there are currently significant delays.

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

11. Do you agree with our proposals for accessible, web-based Local Plans?

The approach being suggested with its standardised model for every Local Plan in the country means it will be very difficult to tailor individual local plans to the needs of an area and the aspirations of local communities. This is another example of 'centralisation' and trying to make the planning system a mechanised process, reducing local choice and local decision making.

Local Plans already include visual representation of their proposals in the form of the Policies map (or maps). They are already (for most areas) available digitally and via interactive maps published on Local Authority websites. The White Paper proposals relating to digital mapping offer nothing that can't already be achieved for the current generation of Local Plans.

The assumptions have been made that most people find maps easily to understand than text in documents. What is the basis for this assumption? Has this been tested?

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

12. Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans?

No – this timetable is undeliverable in practical terms and would require a significant increase in resources put into Local Plans. However, even with additional local planning authority resources the timetable suggest is unrealistic particularly given earlier comments about the detailed work developers would have to do. I would question whether there is capacity in both the public and private sector to deliver within these timeframes.

The 30-month timetable would have to significantly reduce the opportunities for public involvement to a limited period, front-loading this to the beginning of plan-making. While in theory early engagement may enable communities to have more influence on an emerging planning strategy, in practise this is unlikely when housing requirements are proposed to be set nationally by an algorithm and the White Paper intends them to be binding. The reality is that local communities will have less opportunity to meaningfully influence the planning of their area.

There are fundamental conflicts within the Government's proposals. While the opportunities for public consultation and engagement are much reduced in the proposed 30-month timetable, the matters which will need to be addressed and resolved by as part of the plan-making process (to an extent that the plan allocation is in effect an outline planning permission), are massively increased. Furthermore, this additional resource will be put into the process before a site allocation has been confirmed. If the local plan allocation/strategy is not confirmed following Examination/Inquiry time spent on that detailed up-front work will be wasted. This is an efficient approach for both planning authorities and the development industry.

The requirement to prepare a new 'Statement of Reasons' to accompany the submission of a Local Plan to the Secretary of State is likely to develop into a long and time-consuming extra task, likely to result in delay to submission.

The 30-month timetable does not recognise or give time for the democratic processes that will need to be undertaken by local authorities when considering and making policy.

It is suggested that the system needs to be agreed and then realistic timescales set in line with the system.

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

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

There will be increasing frustration from those undertaking Neighbourhood Plans in terms of what they can influence. It is difficult to see a future meaningful role for Neighbourhood Plans in such a centrally-controlled planning system.

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

It is already difficult for many communities to find the resources for Neighbourhood Planning. They are very unlikely to have the resources to invest in emerging digital technology or 'PropTech' companies software as suggested in the White Paper.

Proposal 10: A stronger emphasis on build out through planning

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?

Yes, there should be stronger emphasis and any measures that effectively deliver build out would be welcomed.

Planning applications should include an implementation timetable agreed between the local planning authority and site developer. There should be incentivisation to submit full applications and to deliver to the implementation timetable. It is perhaps not the planning system that is best placed to provide these incentives and consideration should be given to fiscal mechanisms.

Pillar Two – Planning for beautiful and sustainable places

15. What do you think about the design of new development that has happened recently in your area?

There have been some interesting small-scale schemes. However, development at any scale had has seen some poor design, unimaginative and backward looking in terms of environmental standards and space standards.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

Enabling sustainable lifestyles for the whole community.

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

17. Do you agree with our proposals for improving the production and use of design guides and codes?

The opportunity for local communities to adapt the nationally imposed Design Code to the local area is welcomed. However, there is concern that the 'Design Code' approach in general may have the (unintended) effect of reducing standards and suppressing innovation. The approach being advocated may result in an even greater 'pattern book' approach to design of new development – drawing from a limited catalogue of previous development designs within an area. Not all will be of a quality worthy of replication.

There needs to be greater clarity as what is 'Building Better' and 'Building Beautiful'.

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

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

Support the concept of a body that is recognised as the support on design coding and building better places but would suggest you look to the body that already exists (RTPI) supported by RIBA and TCPA.

Agree that all local authorities need to recognise the important leadership role that professional planners have in Place Making. New Forest District Council has a Chief Planning Officer. While we agree that each authority should have a Chief Planning Officer,

we do not agree with the suggested title. The post should be called Chief Officer for Place-making, or Chief Planning Officer.

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

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

The recognition of the importance of good design and design quality in Homes England’s agenda is welcomed.

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

20. Do you agree with our proposals for implementing a fast-track for beauty?

No – this proposal is fraught with difficulties. How can ‘beauty’ be judged in any meaningful way? How can ‘beauty’ be defined? ‘Beauty’ and ‘Sustainability’ are not the same thing. Just because a building looks beautiful (whatever that means) does not mean that it is issue free in terms of all the other matters the planning systems needs to address.

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

Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.

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

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

No questions are asked relating to the Proposals 15 to 18. It is clear from the White Paper that no detailed thinking has taken place as to how these four proposals will actually be addressed. However, we would have serious concerns if environmental policies were weakened. We would like to see greater ambition than suggested and action now on achieving energy efficiency in all new building.

Pillar Three – Planning for infrastructure and connected places

21. When new development happens in your area, what is your priority for what comes with it?

Everything that is needed to support that development and the communities that will live in it, which should include walking and cycling routes, green space and landscaping, play areas living streets and community space, appropriate mitigation to address the developments impact on existing communities and the local environment.

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

22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

No, such a proposal does not take into account that development costs will vary widely, and are not uniform, even for similar developments, across the country. In this area it is very unlikely that a nationally set levy could adequately cover all the infrastructure and mitigation costs of a development. In practise this is likely to have a very significant impact on the delivery of affordable housing and potentially the funding of other necessary off-site infrastructure improvements. It will put increased financial burdens on local authorities. There is real concern that on-site infrastructure and affordable housing will not be provided. The timing of payment is also a real concern, being at the point of occupation rather than at the start of development.

The prospect of some development being excluded from paying the levy is extremely concerning with regard to general infrastructure provision but especially in relation to securing mitigation to prevent harm to protected habitats, as identified through Habitat Regulations Assessments (HRA).

Section 106 agreements should be kept for non-infrastructure requirements such as travel plans, employment and skills plans, phasing of development and habitat mitigation matters.

22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

They should be set locally, but a minimum base rate could be set nationally.

A fixed national rate will not work in areas like New Forest District where all new residential development (and other forms of development too) is subject to extensive requirements for mitigation measures to address the adverse impacts that development will otherwise have on internationally important and protected nature conservation sites.

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?

There is a need for greater investment in infrastructure, affordable housing and local communities. Consideration of raising additional money from landowners who benefit from increases in value as a result of planning permission is welcomed in principle.

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

In principle yes.

The inability to deliver infrastructure in advance of development can slow down or prevent development coming forward. Borrow against Infrastructure Levy could be a way of enabling development through forward funding. However, this does place risk on the local authority given it has no way of ensuring that the development then comes forward or comes forwarded in a timely manner.

Careful consideration would need to be given to other measures that could be introduced to ensure development comes forward to de-risk borrowing for local authorities. The local authority may not be the infrastructure provider so at ability to borrow does not enable infrastructure delivery. Perhaps a wider review of infrastructure funding maybe more appropriate.

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

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

Yes.

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

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

Yes. The lack of affordable housing for local people is a significant issue in New Forest District. Recent national policies have significantly reduced the Council's ability to secure affordable housing for local people. There is a strong preference for on-site provision, as provision by financial contribution is in practise far less effective and also results in delays in delivery.

24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?

This Council is actively engaged in a programme of enhancing the supply of affordable housing for local people, including its own house-building programme and direct purchase of units from market providers. In principle it would welcome a 'right to purchase' affordable housing units of a high quality, setting its own base-line standards. Any financial contribution

should be equivalent to the full cost of making alternative provision elsewhere (land purchase and full build costs.)

However, there are overall concerns about the capacity of a new national 'Infrastructure Levy' to cover this and all the other infrastructure needs and mitigation requirements that are needed from new development.

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

Little risk of 'overpayment' in the system suggested, Underpayment is more likely to be an issue. Would need to ensure that no local authority is worse off than under arrangements and ensure full funding of all infrastructure needs was available to all local authorities.

24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

Yes, clearly a minimum standard should be set, and this should be done locally and reflect local housing needs.

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

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

No, the levy is for a specific purpose – required infrastructure, there is no justification for its use for other purposes.

25(a). If yes, should an affordable housing 'ring-fence' be developed?

Proposal 23: As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms. In doing so, we propose this strategy will be developed including the following key elements:

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

Proposals noted but no details given to comment on

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

No.