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The Coventry Society's response to the Government White Paper – Planning for the Future

This is the response of the Coventry Society, the civic amenity society for the city of Coventry, to the Government's White Paper "Planning for the Future". Below are the detailed responses to the Government's consultation questions, but we would also like to make some general comments on the White Paper.

The White Paper appears to us to be a solution looking for a problem. We do not have the same concerns about the current planning system as the Government's advisers do. The wholesale restructuring of planning appears to be justified on the basis of achieving the Government's housing targets. To us this seems to be a metropolitan / SE of England problem based on previous housing trends.

The title of this white paper "Planning for the Future" is a complete misnomer. The exercise has a far more narrow focus on making more land available for housing, based not on planning for the future, but simply following past market trends. There is no vision for an alternative more sustainable future which addresses the urgent need to respond to national climate change targets.

A recent report by the CPRE, on the basis of Government data, has demonstrated that there is brownfield land available now for the construction of 1.3 million homes, in locations that are more sustainable than building on greenfield sites as planned in the White Paper. We are concerned that the proposals in the White Paper will remove the incentive for the re-development of this brownfield land.

If the problem is housing supply, then the solutions needed are to find mechanisms to unlock the land held by housebuilders in land banks (estimated to be sufficient for more than a million houses) and to stimulate the construction of Local Authority and Housing Association properties. The only time that the Government's housing target has ever been met was when there was a significant local authority house building programme.

These proposals were formulated in the pre Covid era and there is now a unique degree of uncertainty in the property and development world, the implications of which won't become clear until we emerge at the other side of this crisis. To reshape our planning system based on a potentially outdated scenario is foolhardy. Surely there is a need to wait until the economic effects of the pandemic are more obvious, the relative strength and direction of property and investment markets clearer, and the resources of local authorities to cope with sweeping changes are defined?

We are impressed by the vision of world class civic engagement described in the White Paper. Unfortunately the proposals, particularly the omission of the outline planning stage, will not enable this to happen. Furthermore the initiation of this consultation in the middle of the summer and the failure to consult on changes to Permitted Development Rights and the Use Classes Order do not bode well for the future of engagement.

Questions

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

Current system: Local / Comprehensive / Toothless

Proposed system: Centralised / Housing-led / Developer-orientated

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

[Yes / No]

Yes: We are a civic amenity society and we were involved in the consultation on the preparation of the Coventry Local Plan and City Centre Area Plan. We comment on significant planning applications.

2(b). If no, why not?

[Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

N/A

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?

[Social media / Online news / Newspaper / By post / Other – please specify]

We do not agree that the White Paper will make it easier for people to access and engage with the planning process. The effective removal of the outline planning stage for larger developments will remove the stage where people can see and understand the detail of what is proposed and engage with real-life proposals. We find that people have difficulty in engaging with long term plans for what might or might not happen in decades to come.

We are happy with the existing arrangements to find out about planning applications, which is that we see the planning applications online and make comments online. However we feel that there are opportunities to improve arrangements and make them more consistent and coherent.

As a civic society we would like to become statutory consultees and be more consistently consulted on relevant applications.

We are able to see the online Local Plan proposals map; however we would value better online systems.

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

[Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

1. Controlling the massive growth in student accommodation, planning it strategically and properly and ensuring that it can be used for other accommodation when demand inevitably falls.
2. Protecting the remaining green belt and greenspace in the city.
3. Protecting the city's post-war architectural heritage which is currently under threat.

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

[Yes / No / Not sure. Please provide supporting statement.]

No. We believe that the proposals are over-centralised and significantly biased in favour of the development industry and will do nothing to create an environment and a city fit for local people.

The White Paper allows for the allocation of land into one of three categories (growth areas, renewal areas and protection areas). However, zones will inevitably overlap (for example, conservation areas within city centres, where neither renew nor protect annotations are adequate) and so there will inevitably be sub-categories in zones to deal with overlaps or variations in, for example, density. Add in layers of differentiation through design codes and pattern books, and the result is a system just as complicated as the current one, maybe even more so.

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

[Yes / No / Not sure. Please provide supporting statement.]

No. We believe that Local Plans should be just that – LOCAL. These proposals are for a centralisation of planning which will make it more difficult for local people to engage with and will produce results that do not meet local needs.

If England was a uniform country where everywhere was the same as everywhere else, then a single national policy framework might make sense. However despite the best efforts of the development industry we are far from that. Every area has its uniqueness, its beauty, its “localness” and local policies and frameworks are essential to resist the move to standardisation!

Of the options outlined under Proposal 2, we would prefer that Local Plans include local proposals with the exception of those that duplicate the NPPF.

There is a significant risk that streamlining the development management policies out of Local Plans will leave a deficit of local input and a lack of flexibility to adequately address local priorities and concerns.

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”, which would include consideration of environmental impact?

[Yes / No / Not sure. Please provide supporting statement.]

Not sure. We find that there is a considerable difference of opinion about sustainable development. What is “sustainable” to the development industry is far from sustainable to the local community. The broad thrust of the White Paper is to spread development across the country with even more

urban sprawl. There is no strategic thinking about how to achieve the Government's housing targets without the spread of more poorly designed and built housing estates.

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

We are disappointed that an important issue like this has not been considered in the preparation of the White Paper. In our city the current housing targets could not be met without the Duty to Cooperate. If the Duty to Cooperate is removed, we would like to see a return to regional or sub-regional strategies or agreements allocating housing numbers in a planned and negotiated way.

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

[Yes / No / Not sure. Please provide supporting statement.]

Absolutely NO. In our city it will not be possible to achieve the targets set by the proposed algorithm without the loss of further Green Belt, which the Government states that it wishes to protect.

Government reliance on the outcome of computer algorithms has been shown elsewhere to be disastrous and we do not wish to see them used in the planning system. A proper planning system attempts to provide the right development in the right locations in relation to agreed needs and that cannot be done by an algorithm.

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?

[Yes / No / Not sure. Please provide supporting statement.]

No. As stated above we cannot agree with the algorithmic approach to development allocations. We feel that the White Paper does not properly address the issue of affordability. The house building industry releases land slowly in order to keep prices high. The large housebuilding companies have huge land banks (of land with planning permission) that could be released for development but isn't because there is more profit in holding onto the land. If the Government is serious about building more houses it must develop compulsory purchase or land taxation tools to force land hoarders to release land for development and facilitate the construction of social housing.

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

[Yes / No / Not sure. Please provide supporting statement.]

No. We would wish to be consulted on outline applications. There will be a long time between the creation of the Local Plan and the actual development – local people will not find it acceptable that they are not consulted on the proposals at outline stage.

The proposals will effectively “release” thousands of hectares of land with outline planning permission onto the market in one fell swoop. The impacts of this are difficult to predict but could lead to large areas of land being left partially developed like some failed Spanish tourist resort. The

incentive to develop brownfield sites will be removed overnight and our cities will forever suffer from the impacts of past industrial development and pollution.

The local authority will not be able to provide the infrastructure to support all of the development proposed and large estates will be built without the schools and surgeries to support them.

We feel strongly that whatever approach is adopted it needs to include a phasing plan to ensure that brownfield sites are given early priority and development approvals are limited to those that will realistically go ahead. A five year planning horizon should be built into the plans – i.e. ensuring that there is a five year supply of land for development.

The proposals would appear to move the requirement of demonstrating the suitability of sites from developer to the local authority at the same time as removing the income that local authorities receive from outline planning applications and no offer of additional resources to undertake this extra work.

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

[Yes / No / Not sure. Please provide supporting statement.]

No. We find that these proposals run contrary to the stated aim of improving the design and quality of development. It appears that the intention is to reduce the input of the local community into development whilst massively increasing the opportunities of the development industry to make a huge profit at the expense of the local community.

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

[Yes / No / Not sure. Please provide supporting statement.]

Not Sure. We have no opinion on this matter.

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

[Yes / No / Not sure. Please provide supporting statement.]

No, we do not.

We are very concerned over the proposal to remove consultation or public participation and democratic accountability in order to make the process quicker. It is important to get the right decision, not the fastest. Once a development is built it lasts for many years. The determination of an application is an essential part of the growth of a City and should not be made lightly in order to deliver a quick system.

The main stage that civic societies such as our own engage in the planning system is at the statutory consultation period for individual applications, so we are concerned that if people are not allowed the opportunity to respond on individual applications, a large part of the voice of communities, including our own, will be removed. It is entirely appropriate for democratically elected representatives to review and decide upon applications, with officer support, where statutory or

public concern has been raised, or significant impacts noted. Delegating major decisions to officers where principles of development have been established, potentially many years previously, will serve to disillusion the public and engender distrust of the planning system.

On the face of it the aim to digitise Plans and planning applications is a good one. Using better data and technology to provide information as part of planning applications is sensible, providing it works. We have two caveats: Firstly, providing only digital access to planning information or notification to the public will disenfranchise many who may be affected by it. Secondly, there should not be any heavy reliance on technology and algorithms to help decide whether a planning proposal meets the requirements of a design code. This is likely to result in a uniformity of development which would not meet the aims of building beautiful. Quality will only be achieved through the appropriate interpretation of design codes, subject to independent scrutiny by LAs and the local community.

Restricting planning statements to a particular and arbitrary length, irrespective of the requirements of the site, along with the removal of the potential for agreed extensions of time will lead to decisions made in undue haste and with inadequate information. The determination of a planning application is an essential part of the growth of a city and should not be made with inadequate information or undue haste just to deliver a quick system.

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

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

Accessibility of Plans is important and bringing them into a coherent, consistent and accessible modern format is welcomed. If done well, digital could encourage greater public involvement by making the system more accessible and transparent. However, there needs to be a recognition of the varied levels of access to internet usage and a range of approaches are required to engage the widest cross-section of the local community. There will be some members of the community that need printed documents or alternative, non-web-based routes to engage with the Plan making process and subsequent applications. The more involved the community are, the more likely they are to understand the need for change in their neighbourhood, and the more effective and efficient the planning system will be.

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

[Yes / No / Not sure. Please provide supporting statement.]

No we do not.

The plan-led system enables communities and businesses to engage in developing a vision of the future of their area and provides a degree of certainty about likely development. To maximise these benefits, it is important that development plan documents are up-to-date and provide clear policy, and that applications in accordance with the plan are approved unless other material considerations indicate otherwise. So we support the Government's commitment to wanting a plan-led system.

However, we doubt whether the whole Local Plan process (including two periods of public participation) could be completed in 30 months, and then repeated five years later. Three reasons:

- LAs will need to gather the necessary evidence to grant the equivalent of an outline permission in all areas of growth – very time-consuming.
- since it is proposed to make the Local Plan legally the be-all-and-end-all, examinations will be bitterly fought by objectors due to the lack of consultation chances later.
- it is unlikely that statutory bodies and the Planning Inspectorate would be able to cope with contributing to and assessing so many plans so quickly.

Local authorities are going to need significantly more capacity and resources to create and deliver the new style plans for their areas as well as the masterplan and design guides required for all the growth areas, especially given the inevitable reduction in fees from removal of outline applications.

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

[Yes / No / Not sure. Please provide supporting statement.]

Not Sure.

The White Paper implies that Neighbourhood Plans will have a diminished role in the system. If development management policies are centralised, all they will have to do is prepare design codes and design guidance within the context of the Local Plan. But Neighbourhood Plans should also be able to direct particular uses to particular areas to better meet the needs of the community, determine the mix of housing sizes to meet neighbourhood housing needs assessments, include policies to promote employment uses where necessary, identify Local Green Spaces as they do now etc.

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?

Neighbourhood Plans are a significant exercise in democracy. However, the issues regarding capacity and skills in delivering digital Local Plans are magnified at a Neighbourhood level where plan making predominantly relies on volunteers and a small grant. If taken seriously by Government, much-increased resources should be made available to communities both to access expert production professional advice and creating and maintaining enthusiasm. The creation of free-to-use toolkits and programmes from which to build NDPs would help with this, thereby reducing consultant costs.

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 / No / Not sure. Please provide supporting statement.]

Yes.

Plan making does not happen in a vacuum, and ensuring the actual completion of consents is a concern. The current system of penalties for lack of delivery (such as the Housing Delivery Test) is aimed squarely at the Local Planning Authority irrespective of the limitations of their influence once

sites are allocated through a Plan, or consented through application. Simply allocating more land does not automatically bring forward developments.

A range of recent national studies has indicated the significant failure of house builders to deliver on existing permissions. Clearly higher rates of delivery will reduce house prices, which is not in the interest of volume house builders. Thus, an emphasis on enabling smaller house builders to develop is welcome. Often, they produce innovative and distinctive schemes which are a refreshing improvement on the off-the-shelf housing seen up and down the country on large housing developments. Investment by Government and developers in (the currently inadequate volume of) skills training for the building industry will also be an important factor to achieve the targets for increased housebuilding, especially given the intended restrictions on numbers of overseas building workers.

One area that should be reviewed is the minimal amount of work needed to make a material start on development and thereby circumvent a consent expiring without delivering the homes needed. More needs to be done to bring pressure on developers. Adding additional penalties to Local Planning Authorities if development does not complete in their area will not bring about a change in results.

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

[Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]

Coventry has a renowned Post-War architectural heritage layered on top of an architectural and archaeological legacy stretching back into the Middle Ages. Sadly, recent developments, particularly of student accommodation and university expansion in the city centre have fallen well short of respecting or valuing the city's architectural heritage. Modern housing has been of the pattern-book variety and fails to provide local distinctiveness.

Weak planning powers, Councillors intent on development for its own sake, lack of local authorities' resources and time for negotiations added to a developer friendly appeals process undermine the power of local authorities to influence good design. Design guides with statutory backing will be more helpful so long as they are not a 'one size fits all' solution. The proposed reduction in need for full planning applications and reduced scope for negotiations will be detrimental to good design. The input from civic societies with their rich local knowledge will unfortunately be reduced by the White Paper proposals.

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

[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

We do not believe that sustainability is at the heart of these proposals. There is a disconnect between the statement in this question and the recent changes to Permitted Development rights and the Use Class Order which provide for significantly less control and guidance on the design and

functionality of some new and altered buildings. This, coupled with the significant increases in housing requirement resultant from the proposed revision to the Standard Methodology, means that sustainability is being designed out of the system rather than placed at its heart.

The provisions of Local Plans should have sustainability at their core: spatially through location of growth and resultant infrastructure requirements, and also through more detailed development management policies, the latter of which the White Paper proposes removing local input on.

The priorities suggested in the consultation are all important but they are only the superficial aspects of sustainability. Fundamentally, it is about minimising deleterious climate change actions and providing the basis for long-term mixed, healthy and socially cohesive communities. Additional to the list in the heading above we would include: creating walkable neighbourhoods and encouraging active travel; creating the infrastructure for electric vehicles; enhancing well-being; minimising the loss of embodied carbon resulting from redevelopment; ensuring all homes are carbon neutral and water conserving, and improving biodiversity.

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

[Yes / No / Not sure. Please provide supporting statement.]

No.

The production and adoption of design guides and codes has the potential to be positive to plan making and the determination of applications. The White Paper provides no clear route to the availability of resources to provide the necessary local input necessary for the preparation and scrutiny of Design Guides and Codes. It is essential both that adequate resources are made available to ensure that these are prepared in sufficient detail and in parallel with Local Plans, and that such Guides cover all the necessary elements necessary to ensure not just 'beauty' but sustainability (however defined). The proposals in the White Paper are contrary to this with the front-loading of extremely complicated matters on a highly restrictive timeline. In these circumstances it is likely that design loses out as the imperative will be to accommodate the now-binding, inflated housing requirement.

While we would wish to participate in the preparation of design guides there needs to be much more detail on how civic societies and local communities will be able to contribute to their preparation. As with all public engagement, the lay population needs much more support and encouragement and advice in order to participate and to counter the vested interests of the professional class and their clients.

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?

[Yes / No / Not sure. Please provide supporting statement.]

Yes to the first part of the question, no to the second.

Irrespective of the merits of other proposals of the White Paper the greater guidance a central body would give is welcomed. We agree that the body should be "tasked with driving up design standards

and supporting local communities to produce design codes defining beautiful design in each community”.

As far as the Chief Officer proposal is concerned, our view is that it is not the business of national government to dictate how local government structures and delivers its services. It should be sufficient to define statutory responsibilities and then let individual local authorities decide their way of managing and delivering those responsibilities.

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

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

Homes England should be leading the way. It is hard to ask developers and local authorities to drive up design quality if the Government’s own housing accelerator sets anything other than exemplary standards.

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

[Yes / No / Not sure. Please provide supporting statement.]

No.

Whilst the principles might be well-intentioned, we have witnessed the problems of widening permitted development rights in recent years. Without seeing evidence of this approach, we are unable to support it. Whilst we support the proposal to develop a pilot programme to test the concept, we are concerned that implementing a fast track for beauty might result in a speedy rather than a correct decision being taken. We also have concerns that the use of “pattern books” and “a limited set of form-based development types” might limit the opportunity for innovative design that respects local distinctiveness. The recent track record of GPDO amendments suggests they fall well short of achieving good quality, well-designed and beautiful development and also fall well short of fully engaging communities in their creation.

Converting offices to residential; demolishing and rebuilding; adding two storeys to random houses on an estate; all with very limited controls (none of which include a basic requirement of meeting the Government’s own space standards), are all examples which do not instil confidence in this approach. If permitted development rights is seen as a means of speeding the application process, it must not be at the expense of quality: in addition to any new rights, we expect there to be reform of all existing rights, such reform to contain a requirement that those rights must include compliance with the same design quality standards that schemes needing planning permission have to achieve.

We welcome the idea of a series of pilots and would request that Government pause this proposal until a full and independent review of such pilots is completed. We object to the proposals to expand permitted development rights. The Government’s recent independent report demonstrated that it is not creating high quality development, which is one of the fundamental aims of this White Paper.

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

[More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know /Other – please specify]

Development should always have a positive impact on the city, delivering places we are proud of and we do not believe that you can pick a single, narrow priority. Priorities will vary across the city and will change over time. Other Councils will have differing objectives, and this highlights the need to have locally produced priorities and policies to ensure that these distinctive differences are articulated and delivered.

Retaining a plan led planning system is vitally important in this context. It should be the responsibility of the Local Plan to define priorities, ensuring the right balance between types of development, ensuring the provision of the necessary infrastructure and maintaining and enhancing environmental quality.

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?

[Yes / No / Not sure. Please provide supporting statement.]

No.

The proposals do not consider the value of infrastructure required to make a development suitable and instead focus on the value of development once certain costs have been discounted. It would therefore be possible for significant and required infrastructure projects to be underfunded, with no identified mechanism for bridging the funding gap.

Section 106 agreements also relate to matters that cannot be covered by a financial levy, such as the transfer of land, and an alternate legal process would need to be created to ensure these necessary agreements still take place.

The proposal will not result in a quicker or simpler system and brings the risk that there will be a gap between the money needed and the money the Levy raises, with no mechanism to bridge the gap.

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

[Nationally at a single rate / Nationally at an area-specific rate / Locally]

Locally – if such a levy were to be imposed.

Rates should be set at a local level in order to fully reflect the socio-economic circumstances of specific areas.

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?

[Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

Not sure.

The important consideration is that the Infrastructure Levy is sufficient to deliver the infrastructure appropriate to a particular development. In the context of the levy, infrastructure should be viewed in broad terms, including affordable homes, high quality public spaces, biodiversity improvements, alternative transport modes and so forth, all of which are required in order to deliver the types of communities we should be aspiring to see delivered.

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

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

By making the levy payable at the end of the development process there is no direct funding available to deliver enabling infrastructure in advance of occupation / completion, meaning that either Local Authorities will need to forward fund infrastructure projects – and accept the inherent risk in such a proposition as they cannot be certain of when, or how much of the levy will be received – or projects will commence after development is complete rendering the smooth and orderly delivery of sites impossible.

In order to address this anomaly, central government should consider the establishment of an “infrastructure bank”, from which local authorities can borrow in order to forward fund infrastructure projects - loans from the bank to be repayable upon project completion. The costs of borrowing to forward fund infrastructure should be met by developers rather than local authorities.

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

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

Developments under Permitted Development often create infrastructure demand that is not currently contributed to through Section 106 agreements. It is not just housing that creates infrastructure demand that needs to be taken account of. The recent creation of Class E and the removal of the principle of development within that class for its previously separate constituent parts will make discerning the residual value of a Class E scheme impossible given the different yields from, for example (what was) B1 and (what was) A1.

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 / No / Not sure. Please provide supporting statement.]

Yes.

The provision of genuinely affordable housing is one of the most critical issues and demand for this, especially socially rented homes, is likely to increase significantly as the economy recovers. Any reduction in the volume of affordable housing compared to current levels is untenable and all efforts should be made to increase these requirements.

Provision should be made on-site wherever possible. This ensures development diversity, provided on a tenure-blind basis and provides much greater benefit than off-site provision or commuted sums.

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?

[Yes / No / Not sure. Please provide supporting statement.]

Where local authorities do not own stock there is no benefit to a 'right to purchase' and therefore the in-kind route is preferred.

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

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

Mitigation against overpayment would be appropriate.

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 / No / Not sure. Please provide supporting statement.]

It is important that steps are taken to ensure quality. The units should be to the same standards produced elsewhere on the site and should be tenure blind.

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

[Yes / No / Not sure. Please provide supporting statement.]

No.

There will need to be serious consideration given to the mechanism by which the Infrastructure Levy pot is distributed to infrastructure projects, some of which will be delivered outside the authority (the NHS for example). There is a real prospect that the core infrastructure funding ask will outweigh the levy receipt, especially if 25% of the levy is to be passed to the local neighbourhood to spend on their infrastructure priorities which may well sit outside of core projects.

By widening the scope of what the Levy could be spent on the potential for competition and tension over the pot will increase and, as noted above, the reality may well be that there is insufficient funds to deliver the core infrastructure required.

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

[Yes / No / Not sure. Please provide supporting statement.]

N/A

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?

Yes.

It will be important to design consultation and engagement processes to ensure that those covered by section 149 of the Equality Act are able to fully participate in and contribute to the Local Plan making process. Furthermore there should be a requirement to ensure that the needs of people with protected characteristics are reflected in local plans.