

DRAFT

Consultation Notes:

- There is no space for a general response, but an email address is provided. Do you think we should also send in an accompanying statement?
- The survey is prescriptive, it is not possible to return additional statements in areas other than indicated below. If there is an opportunity to offer a response that I have not taken it is indicated in **red**.
- The questions are in **bold**. Norwich Society responses are in **blue**.
- The responses stated below are collated from prepared public response documents by:
 - UK Architects Declare a Climate and Biodiversity Emergency
 - RIBA [Royal Institute for British Architects]
 - TCPA [Town and Country Planning Association]
 - RTPI [Royal Town Planning Institute] – blog pieces and commentary
 - **Civic Voice - not yet supplied but their responses would be welcome and will be assimilated on receipt.**

Other sources include Guardian Newspaper, IHBC and Local Government Assoc.

Please send me any commentary and I will do my best to edit accordingly. Any more local insight or specifics would be most welcome.

Pillar One – Planning for development

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

Guardianship or **Stewardship**

Explanation (no space for submission): Although the process for managing change to England's built heritage is set out in National Planning Policy Framework and legislation, it is the local planning authority who administer the conservation protection granted by law.

The ability to offer this protection, has already been eroded. Historic England report that between 2006 and 2018, the number of conservation specialists providing advice to councils fell by 35%, from almost 1,100 to just under 600. (Source: Guardian October 2020). We need to ensure that these proposed changes do not further undermine the ability of the local authority to protect our historic buildings and places.

Under- valued

Explanation (no space for submission): Following decades of piecemeal reform and underfunding, our planning system is weak. It lacks the powers it needs to create high quality development. From the tragedy of Grenfell Tower to the scandalous shortage of decent, affordable housing and the looming threat of climate breakdown, there is overwhelming

evidence that the prevailing model of light-touch regulation and market-driven change has failed.

Rather than less planning, we need more. To build a better, more democratic future, we need to strategically integrate investment, coordinate development, and ensure high-quality outcomes. Of course, there are costs to such a system but the wider public benefits are potentially immense. A period of significant public investment offers huge opportunities to tackle some of the biggest challenges we face as a society: the crises of decent, affordable housing, physical and mental health, climate change, and social inequality. A more positive planning reform agenda could play a crucial part in these vital tasks.

Town & Country Planning Association - The Wrong Answers to the Wrong Questions

Agent (for averting the climate crisis)

Explanation (no space for submission): [The planning system is] an important (1) Safeguard to ensure the built environment is designed within planetary boundaries. We see that the planning system can be (2) Outdated, not reflecting the industry's recommendations for best practice in designing in a (2) Climate and Biodiversity Emergency. We see the planning system to be a place where there is room for local regions to become (3) Pioneering innovators, leading the way for the rest of the country to advance its efforts to meeting climate and biodiversity commitments, for example councils in Nottingham, Bristol and London.

UK Architects Declare Climate and Biodiversity Emergency - Consultation Response

2. Do you get involved with planning decisions in your local area? [Yes / No]

2(a). If no, why not? [~~Don't know how to / It takes too long / It's too complicated / I don't care / Other - please specify~~]

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]

Digitalisation will of course allow greater distribution to some residents and relevant stakeholders. However, it is imperative that planning notices and decisions remain accessible to lower income stakeholders and those who are not digitally engaged.

Information associated with the planning process should be more easily accessed to encourage more meaningful public engagement and consultation. A streamlined, digital system is welcomed, and the use of more visual plans and interactive and accessible map-based online system is encouraged.

Public access to a centralised dataset containing inter-departmental mapping such as DEFRA's environmental, biodiversity and ecological mapping data could be available to inform planning decisions. Routes for non-digital, or assisted, access for the public must also be available.

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]

The twin crises of climate breakdown and biodiversity loss are the most serious issue of our time. Buildings and construction play a major part, accounting for nearly 40% of energy-related carbon dioxide equivalent (CO₂e) emissions whilst also having a significant impact on our natural habitats.

There needs to be a pathway to full decarbonisation of the built environment. Local planning should firstly prioritise that that all new developments including homes, schools and workplaces should be net zero operational carbon developments, i.e. should not burn fossil fuels, should be 100% powered by renewable energy, with high fabric performance. We need to also accelerate the shift to low embodied carbon materials in all buildings, and move towards a future with whole-life carbon impacts within planetary limits.

Our built environment needs to become regenerative. Net biodiversity gains must be prioritised alongside decarbonisation. Nature-based solutions offer multiple co-benefits including resilience, flood mitigation and health and wellbeing benefits. UKGBC's recent 'Nature-based solutions to the climate emergency: The benefits to business and society' gives further detail.

Design of new places - comment

Heritage protection proposals in the whitepaper appear to front-load assessment works to the Local Plan stage, whilst pushing back detailed assessment to reserved matters; with potentially unmanageable consequences for the owners of heritage buildings. Who pays to understand the significance of the heritage asset for the Local Plan?

The whitepaper also refers to protected views but not the consideration of setting, rather suggesting that this could be distilled into 'protected views'. This is a great deviance from the current legally tested position and would be of great concern to the Norwich Society.

The aspirations to see more historic buildings have the 'right' energy efficiency measures to support zero-carbon objectives is likely to prove challenging. Understanding how this can be managed will be critical to our response to the proposals. We have a key interest in protecting the significance of the heritage assets within our city. Further detail is needed to understand how this is proposed to work.

A NEW APPROACH TO PLAN-MAKING

5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / **Not sure**. Please provide supporting statement.]

More detail and specific proposals are required.

Norwich Society agree that there is a need to make local plans more accessible and visually engaging, but they need to be about much more than simply allocating land for development. The Planning White Paper recognises the importance of planning and the impact places have on people's mental and physical health. But then it goes on to propose that local plans will become shorter and "limited to no more than setting out site- or area- specific parameters and opportunities"

If as proposed, Development Management Policies will sit at the national level, and Local plans should set out positive visions for the future of areas, clarification is required about how local plans and decision making will take into consideration important issues such as the impact of proposed development on health and wellbeing and climate change. For example, how can positive policies about active travel or climate change, which may be set out in the National Planning Policy

Framework, be taken into consideration for schemes coming through in 'growth' or 'renewal' zones? How will the new system make sure local plans are ambitious about promoting equality and reducing socio-economic exclusion?

If the reformed system is to deliver better outcomes, which is the aspiration of the White Paper, there need to be assurances that those outcomes will not be solely based on local design guides. Plans need to address much more than just housing design and ensure that climate and human health are at the heart of planning for transport, employment, minerals and waste.

In light of the importance of local design guides in the new system, and to make sure that they carry sufficient weight and local communities are central to their development, the proposals should be revised so that local design guides must be developed for inclusion in the local plan, rather than it being seen as a 'twin track' approach.

Both design guides and local plans should be underpinned by strong, legally binding minimum standards on all issues which determine the decency of our homes, including minimum space, access to green areas, fire safety, climate change, walkable neighbourhoods and air pollution. These should be defined at the national level to ensure that all new homes support the health and wellbeing of their residents. Doing so would bring clarity to confusing systems and demonstrate how seriously the government takes these issues.

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.]

Not sure. More detail is required. We would like to see the detail of how this is to be achieved while observing the Climate Change Act.

Comment on the trend towards centralization

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. More detail on the scope and measure of the new sustainable development test is required.

Of fundamental concern is the definition of sustainable development on which this test will depend. This definition will need to sufficiently address the UK's legally binding climate commitments, with minimal levels of performance for all new development to meet in terms of carbon emissions, biodiversity, climate resilient settlements and social outcomes.

Getting the 'sustainable development test' right is one of the most important tasks the government faces. The wrong decisions at this stage would be catastrophic. We are concerned that the merging of Environmental Impact Assessments with Sustainability Appraisal will oversimplify what is a complex interrelationship of issues, and will not, as hoped, drive up local environmental and ecological standards. We would strongly oppose measurement against a national or regional average baseline, as local granularity of approach is needed.

Norwich Society believe that a set of key principles should inform the government's thinking. The test should be:

- Holistic and based on the UN Sustainable Development Goals that relate to the built environment, including but not limited to: affordable clean energy, sustainable cities and communities, responsible consumption and production, and climate action
- Ambitious and flexible. It should also allow exemplar local councils to go further and faster

Achieving net gain and not net harm is a really important aspect of the proposals, of which we support.

The consideration of sustainable development must be prioritised within future locals plans, given the proposals within the white paper for an area-based planning system where automatic outline planning permissions could be granted. Government should consult widely with key sustainability organisations to provide the correct level of detail and priority to align with the requirements of the 2050 Carbon Zero commitments and the wider climate and biodiversity emergency.

The planning system must stop pitting the environment against other aspects of development. Instead of requiring local plans to “strike the right balance between environment, social and economic objectives” (page 28), Local plans should focus on how sustainability can deliver social and economic objectives.

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

It is not possible to deal with all environmental issues at the scale of a single local authority, coordination is needed around environmental issues such as flood zones, rivers, wildlife corridors and air quality. Infrastructure scale planning is needed for zero carbon transport, energy systems, housing infrastructure (e.g. community energy centres, allotments, recycling centres) and to encourage active modes of transport such as walking and cycling.

Norwich Society agree with UK Architects Declare that unless there is a robust replacement for the formal ‘Duty to Cooperate’ there is a risk that environmental, conservation and transportation factors will not be adequately addressed. Currently the formal ‘Duty to Cooperate’ covers consultation from numerous pertinent stakeholders. This includes the Environment Agency, Natural England, Homes and Communities Agency and Integrated Transport Authorities all of whom make expert contributions, particularly when it comes to issues around biodiversity and the climate emergency.

Expert input does not only achieve better outcomes but also relieve pressure on workflows within the planning department. One alternative could be to place consultants from these agencies directly within the planning department, to facilitate quicker and stronger collaboration.

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.]

Not sure. More detail is required. Further details would be welcomed on how housing target figures would be formulated if a standard method for establishing housing requirements was to be introduced.

Whilst the Government could implement a standard method for housing requirement figures, ultimately Norwich Society believes that housing needs should be assessed and analysed by Urban Planning professionals, whilst also consulting local councils.

Nationally prescribed targets would need to consider future growth and planned infrastructure developments with a transparent methodology, that is developed with respect to planetary limits. This includes considering embodied and operational carbon associated with proposed targets against the UK's carbon budget.

Any targets should be developed together with local authorities and with respect to their carbon targets, at a granular level. The embodied carbon of construction materials needs to be taken into account as part of this. To achieve this, we need to level up UK manufacturing to meet National, Regional and Local carbon commitments and to support domestic supply chains.

All developments should be regenerative and achieving net biodiversity gains always. The densification of existing urban areas and brownfield land should be prioritised to reduce emissions and to leave land available for nature restoration. Brownfield land is often rich in biodiversity and ecology terms, having been left without human occupation.

Demolition in any area should be a last resort, and our existing built environment should be considered as a carbon store. We cannot afford to unnecessarily demolish and build anew. Demolition should require planning permission with whole life carbon analysis to justify it to ensure we do not needlessly waste carbon already sequestered by buildings.

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.]

Not sure. More detail is required. Affordability and the extent of existing urban areas will likely form part of the indicators of the quantity of development to be accommodated. The quantity of future developments should also be reviewed against local environmental conditions such as local water and drainage infrastructure, local biodiversity habitats, impact on air quality and other key local environmental indicators, as well as existing and proposed infrastructure, such as public transport, active transport connections and renewable energy supply systems.

A STREAMLINED DEVELOPMENT MANAGEMENT PROCESS WITH AUTOMATIC PLANNING PERMISSION FOR SCHEMES IN LINE WITH PLANS

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.]

The White Paper states: "Our reforms will democratise the planning process by putting a new emphasis on engagement at the plan-making stage. At the same time, we will streamline the opportunity for consultation at the planning application stage, because this adds delay to the process and allows a small minority of voices, some from the local area and often some not, to shape outcomes."

Norwich Society agree that local plans should be made more visual and accessible and that engaging more people in plan-making would be positive. This should not be at the expense of democratic processes, however, and the government must understand that making a system more accessible to the public is not the same as making it more democratic.

The specific details of the proposals reduce democratic accountability and the individual rights of the citizen to participate and this must be addressed as planning reform is taken forward.

Norwich Society are concerned that it is unrealistic to propose that the level of detailed needed to inform whether or not a large-scale site should receive outline planning permission can be included in a key and annotation supporting a map. References are made in the White Paper to master plans being produced, which are a critically important ingredient to deliver high quality new mixed communities, but it is unclear how existing and future communities will be involved in that process.

The Planning system is not, as this Paper would seem to proposit, intended to ensure a housing supply.

The Norwich Society has no comment within this remit on the Government's objective of 300,000 residential units a year. We do however have a strong commitment to ensuring that the residential extension to our city are sustainable and serviced with the necessary facilities to build resilient communities.

Permission in principle [PIP] for significant developments within Growth, & potentially Renewal, zones will stop our local authorities from being able to direct development around key transport routes and travel hubs, ensuring that new and existing residents live in '15-minute cities', or safeguarding land for infrastructure, schools, retail or employment. Norwich does not need any more low-density, car dependent carbon hungry development at it's outer boundaries. We need well planned, focused communities.

At its periphery Norwich has complex boundary arrangements where areas identified for significant development fall across local authority jurisdictions. This PIP proposal, combined with the withdrawal of the Commitment to Cooperate, could be disastrous for our city.

Norwich Society understand that currently 90% of all planning applications are granted, and developers have permission for a million dwellings across the country [<https://www.tcpa.org.uk/the-wrong-answers-to-the-wrong-questions>] with 40% of homes already granted permission going unbuilt. [https://england.shelter.org.uk/media/press_releases/articles/40_of_homes_granted_planning_permission_go_unbuilt] We do not believe that the proposed approach will make a positive difference to the quality and quantity of homes available in England.

Civic Voice comments on the democratic process to be assimilated.

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.]

Not sure. There is not sufficient detail in the white paper to understand the specifics of the renewal area proposals.

In Norwich we specifically identify that the PIP in Growth areas pose a significant risk of 'hollowing out' our city. The historic significance of our city centre, a single conservation area, will likely,

rightly, lead to a Protected designation extending over potential development sites. Thereby, the comparable difficulty of obtaining consent will make the city centre much less attractive to developers.

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.]

Norwich Society are concerned that such a proposal focuses on speed rather than recognising the importance and value of a truly democratic planning system. However, this area of the whitepaper does not fall within our remit.

10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]

Norwich Society welcome the aspiration to involve more people in planning and to focus on delivering better outcomes. We are concerned, however, that the specific proposals focus on speed and certainty for developers rather than demonstrating a real commitment to working with local communities.

Pillar Two – Planning for beautiful and sustainable places

A NEW INTERACTIVE, WEB-BASED MAP STANDARD FOR PLANNING DOCUMENTS

11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

Digitalisation is welcomed for the widening of participation and ease of access. However, it is imperative that non-digital, or assisted, access for the public must also be available.

A STREAMLINED, MORE ENGAGING PLAN-MAKING PROCESS

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.]

Norwich Society recognise that the proposal includes ‘comprehensive “best in class” ways of achieving public involvement’ at the plan making stage and agree that more needs to be done to involve communities in plan making. But this must not be used to justify the removal of other democratic input. People’s right to be heard in person by a planning inspector must be retained. It is not sufficient to propose that inspectors will have discretion about how citizens can be involved in the examination of local plans.

The right to be heard under Section 20(6) of the 2004 Planning Act is the only clear civil right that exists in the planning process for the individual citizen. It includes the important phrase: ‘Any person who makes representations seeking to change a development plan document must (if he so requests) be given the opportunity to appear before and be heard by the person carrying out the examination.’ This allows an individual to appear in front of an inspector and exercise other opportunities to ask questions of witnesses. This opportunity for the public to interrogate the evidence is absent from the major infrastructure regime but crucial to any meaningful opportunity to participate. It is not sufficient to suggest the opportunity to appear at a public inquiry could be replaced with the opportunity for inspectors to have a telephone conversation with the citizen, or ask for further written comments, if the inspector chooses to do so.

The right to be heard in person is even more important because development plans will become the only meaningful opportunity for community engagement.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]

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?

Norwich Society believes that Neighbourhood Plans have a much greater role to play in the successful planning of a place than identified in the whitepaper. Neighbourhood Plans offer a route for engagement, encouraging local acceptance of the proposed Housing numbers and a granular level of delight which cannot otherwise be built into the Planning process.

Norwich Society believe that neighbourhood Plans should be integral to not just developing design policy but in identifying areas for Growth and Renewal and in determining how the trade-offs with protected areas should work in local communities. With Local Plans having to work to a 30-month deadline, neighbourhood plans could continue to share the load. We ask the government to empower the Neighbourhood planning process in the new legislation for the benefit of all.

SPEEDING UP THE DELIVERY OF DEVELOPMENT

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.]

We would need to see more specifics on what could be achieved. It is hard to anticipate how this emphasis could be realised.

Pillar Two – Planning for beautiful and sustainable places

CREATING FRAMEWORKS FOR QUALITY

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]

As everywhere the quality of development in Norwich varies. Norwich Society was instrumental in the campaign against the proposed development of Anglia Square. The quality of the proposed development was a key concern in our objection to the scheme.

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]

Tackling the climate crisis is the top priority for tackling sustainability in my, and every, area.

Norwich Society believe it is essential that the term 'sustainability' is defined in light of the twin crises' of climate and biodiversity. We see a need to think Globally, and act Locally. This legislation should enshrine the principles of knowledge sharing on how to deliver, operate and maintain the built environment within planetary boundaries. International collaborations enable us to learn lessons that we can deliver on a local scale.

The planning system has a unique contribution to make in the effective delivery of the UK Government's carbon reduction target. Planning is fundamental to positively delivering new renewable energy systems, to promoting the carbon performance of what we build, of finding the right sustainable locations and of designing places to support healthy and zero carbon transport options.

It is vital any new planning system should have climate change as its first legal and policy priority.

Sustainability targets and principles must be defined nationally and applied locally, with local sustainability initiatives align with National and International climate and biodiversity commitments. We would like to see MHCLG developing their definition for sustainability with the UK as a world leader in decarbonisation of its built environment.

The whitepaper as written creates uncertainty about the role of the system in tackling climate change and fails to provide any real explanation of how carbon reductions will be secured through the new proposed framework. Where the whitepaper is specific, for example, on the energy performance of buildings, it is disappointingly unambitious, and states only that "from 2025, we expect new homes to produce 75-80 per cent lower CO2 emissions compared to current levels." There is an urgent need for clarity about the roadmap for achieving zero carbon homes.

In considering the objectives of a new planning system for England it is vital that the government sets out clearly how carbon reduction fits with its other objectives around housing delivery and securing beauty. The new system must align the legal objectives of town planning with the 2008 Climate Act. As part of the new system the existing legal duty on development plans to address climate change should be expanded in scope and strengthened in effect. The duty must apply to both development planning and development management and include explicit reference to implementing the carbon reduction budgets required by the 2008 Climate Act. The duty should also apply to the development of any design codes and pattern books and to neighbourhood plans.

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.]

Considering the importance of local design guides in the new system, to make sure that they carry sufficient weight and to ensure local communities are central to their development, the proposals should be revised. Local design guides must be developed for inclusion in the local plan, rather than it being seen as a 'twin track' approach.

Norwich Society recognise that there are examples of local design codes being developed with existing communities and used effectively. They can be positive in terms of ensuring places are more walkable, have access to green space and new development fits with the existing design. Within a reformed system their scope must be broad enough to make sure they deliver beautiful, healthy new homes and development. This should include them being able to set out standards for the quality of new homes, as well as requirements for the external environment. We are concerned however about the extent to which they really will be able to inform development within the proposed new planning system.

Norwich Society believe that it is important that the production of locally prepared design guidance should focus on climate change mitigation and adaptation following best practice principles.

A key factor in meeting the UKs carbon reduction commitments is the upgrading of existing buildings. Local design guides will be important to ensure this work is carried out in a sensitive, appropriate manner. Provision needs to be made for guidance for adaptation of existing building fabric to reduce energy use - e.g. addition of external insulation and new cladding, replacement of glazing, and incorporation of renewables. This guidance can be developed at a neighbourhood plan or individual street level.

This will support the expansion of a UK retrofit industry, and opportunities for the UK to lead in an emerging global sector.

Where pattern books and design guides are derivative of local vernaculars, due consideration should be made as to the social and climatic conditions those vernaculars arose. New developments fundamentally need to support technologies and standards of design that will help us to meet the Paris Agreement targets the UK has committed to. For example, the angle roof pitches will influence our ability to incorporate photovoltaics, and window size and distribution will be a huge factor in determining the fabric performance and passive solar strategies that buildings are able to incorporate.

The proposals for pattern books and aesthetic design rules will need to also incorporate industry best practice guidance such as established standards including Passivhaus, as well as innovative guidances arising directly from the Architecture and Built Environment profession, including the RIBA 2030 Climate Challenge and the LETI Climate Emergency Design Guide.

The incorporation of best practice environmental design approaches within any new design guides and codes will help to level up standards of construction across the UK, and reduce the impacts of the built environment on the wider environment.

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, providing that this body and their resultant design codes acts to safeguard the quality of the built environment, ensuring the delivery of objectives outlined in our response to 17, then Norwich Society could support this. The chair of the local design panel must have balanced design agenda with sustainability at its core & The design panel should include an industry recognised sustainability expert representative

The plans need to be realistic about how to achieve good design. Good design is not delivered through 'rules' about the appearance of buildings and it is very hard to establish design quality from written and drawn planning submissions. Visual design guides are helpful because they establish certain principles, but good design needs scrutiny and architects who are able to engage with communities and local authorities.

The issue of design scrutiny will be exacerbated by one of the biggest challenges faced by the current planning system; lack of resources. While efficiency savings and new ways of working may free up some resource, it is imperative that the government recognise the damage that cuts to funding have caused. Without skilled personnel, the ambitious agenda of the whitepaper will not be deliverable.

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]

More detail is required.

We agree that sustainable, net zero carbon designs with net biodiversity gains that promote healthy and socially inclusive communities should be prioritised by Homes England. Good quality design should be at the core of any housing scheme. If the planning system can support Homes England's to prioritise this within their objectives this would only be a good thing. If Homes England can be a successful test bed for providing high quality design whilst managing to deliver affordable homes then it could help create valuable benchmarks for the wider market. We welcome further details on how this is to be proposed.

A FAST-TRACK FOR BEAUTY

20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

Norwich Society believe that, in new development, only an environmentally sustainable building can now be considered good design. Sustainability and regenerative design principles cannot be overlooked for the sake of beauty alone.

Good design is not solely determined by aesthetics. It is hard to determine how much quantitative metrics such as whole life carbon can be compared with qualitative assessments such as beauty, without seeing further detail.

We believe that the sustainability and suitability of a development should hold significant weight in the determination of an application, as well as the protection of our natural, built and historic environments. We are concerned that by fast-tracking beauty, this is not putting “sustainability at the heart of [...] proposals”.

However, Norwich Society would welcome further details on the proposal for fast-tracking beauty as we do not object to the principle.

EFFECTIVE STEWARDSHIP AND ENHANCEMENT OF OUR NATURAL AND HISTORIC ENVIRONMENT

No questions

Pillar Three – Planning for infrastructure and connected places

A CONSOLIDATED INFRASTRUCTURE LEVY

22. 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]

Norwich Society believe that good place making considers all of the above factors. There is no one size fits all answer.

23(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.]

It is important that all homes, including those delivered via permitted development rights, contribute towards to delivery of much needed infrastructure, including but not limited to affordable homes.

23(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]

No response

23(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.]

No response

23(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.]

No response

24. 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.]

Section 106 agreements are currently a critically important route for delivering affordable housing and any new system must aim to secure at least the same amount of affordable housing and ideally more. I am concerned however that much more detailed modelling and policy development needs to be undertaken to make sure that this commitment is met.

25(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.]

Norwich Society believe the focus for Government should be on increasing the number of genuinely affordable homes, if it wants communities to be more supportive of new housing proposals.

Access to housing is one of the great injustices in our society, and these proposals would serve to exacerbate the situation. Under the new proposed system, 30,000 fewer affordable homes would have been built over the past five years [<https://www.theguardian.com/politics/2020/oct/07/up-to-30000-affordable-houses-to-be-scraped-under-tory-planning-reforms?>]. The introduction of First Homes, discounted by at least 30% of the market price, could be a welcome additional product, but we are not convinced this will bring the step-change in provision of genuinely affordable homes that are needed across the country. We believe Local Authorities are best placed to set out the mix of affordable housing tenure, that best meets local needs. With this in mind, Norwich Society objects to the proposal to raise the threshold for affordable housing provision to 40 or 50 homes, for small and medium-sized builders (SMEs).

Whilst we support efforts to encourage more SMEs to enter the market, we do not believe the potential benefits outweigh the impacts and are very concerned that this will reduce the amount of affordable housing coming forward, at a time when it is desperately needed. We consider the current thresholds in national policy (10 or more homes, or lower in some rural areas) should remain.

25(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.]

No response

25(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.]

No response

25(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.]

No response

26. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

26(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

More details required to determine our opinion on this matter.

No response

Delivering change

No questions

Equalities impacts

27. 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?

Norwich Society are disappointed that the government has not undertaken its own impact assessment to understand the potential impacts of these proposals and published it alongside the consultation.

Local plans should be made more accessible and transparent and digital tools have a role to play in that. But those sections of society who are less focused on accessing information digitally should not be excluded from processes.