

Consultation on changes to planning for the future: Recommended WCC Response

Question	Response
1. What three words do you associate most with the planning system in England?	Cumbersome, old-fashioned and complicated
2(a). Do you get involved with planning decisions in your local area?	None required from WCC
2(b). If no, why not?	None required from WCC
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?	None required from WCC
4. What are your top three priorities for planning in your local area?	Zero carbon district with jobs located near to homes, Access to green spaces and enhancement of biodiversity/ green infrastructure. Fibre to property and business premises with infinite capacity speed broadband
5. Do you agree that Local Plans should be simplified in line with our proposals? Yes in part.	Agree in part that clear framework for the final outcome should be set up to accommodate rural districts as well as urban ones. The proposals feel like a blunt instrument in areas of constrained land and limited scale. The available land will be difficult to define in such black and white terms within existing complex urban/rural landscapes. The proposed approach does not appear sufficiently sophisticated to enable consideration and retention of the quality and diversity of places across the district. For this reason the City Council does not support the proposal for

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	<p>designation of three areas (Growth, Renewal and Protected) but would support the designation of Growth areas only, as suggested as a possible alternative approach. This is provided there is adequate consultation on the elements which have yet to be put in place, such as the definition of Growth areas, standard conditions and masterplanning requirements. Growth areas are those in which the majority of the additional housing and other types of development sought will be delivered, so it is reasonable to streamline planning processes here. However, these areas are also the most complex and require high quality masterplanning and design, as well as environmental impact assessment which would need to be resourced.</p> <p>For the reasons stated above, the division of all other areas into Renewal or Protected areas is not considered necessary and could create considerable complexity, debate and delay, when the current policy approaches for these areas already enable their proper planning. Identifying sub-areas within these areas to reflect changes in character could result in a myriad of small sub-areas, each requiring their own design codes if their character is to be conserved, which would be incredibly resource intensive and time consuming to produce with no benefit beyond what the current system achieves.</p> <p>In addition to the above there is a risk that adopting this type of approach over such large areas could stifle the creativity and innovation of architects and developers, who could otherwise produce high quality development which is different to the design code. The Council is also concerned that the Renewal areas would be vulnerable to harm from insufficient levels of control or methods of regulating/ensuring compliance with the NPPF.</p>
6. Do you agree with our proposals for streamlining the development management	Generally this will help to keep LPs more concise and land use strategy based. Having central policies that all authorities use will

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<p>content of Local Plans, and setting out general development management policies nationally?</p> <p>Yes in principle</p>	<p>make life simpler / more certain for developers, provided these are subject to consultation and discussion. Setting the bar at “exceptional circumstances” for local policies is too high; there will be policy subject areas that require specific locally drafted policies which reflect local circumstances and are not therefore suitable for a national policy (such as nitrate neutrality) and parameters such as height limits, scale and/or density limits might not be enough at the national level to secure high quality design on all new developments. Authorities should be able to include policies that ensure the highest industry standards possible at the time of construction (i.e. zero carbon, insulation, water use, etc).</p> <p>The suggested option of technical standards for Listed Buildings could work if they were advisory best practice style guides, but flexible enough to allow for interpretation/adaptation in relation to impact on the asset in question – one size doesn’t fit all and an overly prescriptive approach would be unlikely to be successful or allow sufficient flexibility.</p>
<p>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?</p> <p>Yes</p>	<p>The City Council broadly supports this proposal, subject to the response to Question 7b below. The White Paper is, however, silent on how it will ensure that there are a range of sustainable jobs close to where people live. A good range of jobs in a local community delivers low carbon travel to work. It will be essential that the test of sustainable development includes transport planning for all modes of transport and improvements to the public realm. The White Paper also makes limited mention of the importance of the natural environment to health and well-being, and enhancement of biodiversity in delivering sustainable development. Whilst local design codes could and should set out requirements for biodiversity enhancement, the NPPF and national design code should explicitly recognise the role of the natural environment and importance of</p>

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	proactive approaches to biodiversity enhancement and net gain.
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 is an ineffective replacement for regional or sub-regional planning, the White Paper's proposals would remove any form of planning or coordination above the District level. 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. There is a risk that unless mechanisms are put in place to secure a coordinated response to plan making over a wider area the outcome will be a series of disconnected local plans. There is also a real danger that if the DTC is abolished there will be no mechanism in place to deal with any cross boundary infrastructure issues.
8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? Greater clarity required.	<p>The City Council agrees that the new methodology must take constraints into account, but could not support the proposed methodology given the lack of clarity as to how the various factors would be measured and balanced in order to ensure that there is a consistent and transparent approach across the whole of the country. Based on the proposed updated standard methodology recently consulted on, affordability is over-emphasised and only one 'affordability multiplier' should be used (the current affordability level). Access to employment, housing types needed and household size are other relevant factors. Where there is a substantial change in an authority's housing requirement and the reasons for this can be fully justified, it is important that suitable transition measures are put in place.</p> <p>The proposed methodology is likely to create an unachievable requirement for authorities such as Winchester, where high property prices in the South Downs National Park will inflate the Council's</p>

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	<p>standard methodology housing requirement, but the fact that 40% of the District is in the National Park severely limits the ability to provide this level of housing. This may raise prices, not depress them, making our District less affordable.</p>
<p>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?</p> <p>No</p>	<p>While the City Council accepts the need to take account of affordability, it would object to this being given 'double weighting', as in the recent proposals to update the standard methodology. Only one affordability indicator should be used, based on the current affordability level. Affordability alone is not a reliable indicator of housing need, which is influenced by many other factors.</p> <p>It is agreed that the extent of existing urban areas should be taken into account, particularly as these are likely to be the most sustainable locations for new development and have most potential for brownfield development.</p>
<p>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?</p> <p>Greater clarity required.</p>	<p>The proposal for automatic consents is supported in principle, but much will depend on the standard national conditions that would be attached to an outline consent. These would need to specify the requirement for a masterplan and compliance with the local plan and any design codes / SPD, and the implication is that this would be the case. However, it is not clear how matters such as phasing of development, mitigation and infrastructure provision will be dealt with, especially as it is proposed that s106 (planning obligations) would be abolished.</p> <p>It is likely that considerably more work (and time/resources) would be needed at the local plan allocation stage to ensure that matters that might currently be the subject of conditions at the planning application stage are specified in the local plan and can be delivered. In view of this, there would be justification for a charge being imposed on sites which are promoted for inclusion in the local plan. It would also be</p>

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	helpful if there is clear guidance on the level of information that a prospective site promoter would need to supply to a local planning authority at the Plan making stage in order for a site to be accepted. This would ensure a consistent approach across the country and greatly assist the local planning authority and help to speed up the plan making process.
<p>9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?</p> <p>Greater clarity required.</p>	The City Council can only give qualified support to these proposals in principle at this stage, as they leave a lot of detail to be decided in future. In the absence of these details there is a great deal of concern that any controls could be too relaxed / restrictive and with a lack of local input and control.
<p>9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?</p> <p>No</p>	<p>New settlements do not appear particularly well suited to this route and it is questionable whether they are 'nationally significant'. They would be very complex and probably controversial proposals and the NSIP process implies that the need and form of the proposals would be approved in principle in advance by Government. This is not considered appropriate, and there is also a question of whether a planning fee would be payable as by their very nature they are very resource intensive in terms of the contribution needed by a local planning authority.</p> <p>If a new settlement is created a Development Corporation could be a suitable vehicle to manage delivery.</p>
<p>10. Do you agree with our proposals to make decision-making faster and more certain?</p> <p>Yes</p>	The City Council generally supports the aims of the proposals, subject to the need to avoid the planning application process becoming a 'tick-box' exercise with no scope for planning or design judgement at all. There is also a risk that a streamlined system could stifle creativity by designers. There needs to be scope for innovation and consideration of local circumstances and greater clarity is required about how these proposals would address climate change issues.
11. Do you agree with our proposals for	The City Council supports this proposal in principle, again subject to

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<p>accessible, web-based Local Plans?</p> <p>Yes</p>	<p>the need to avoid plans becoming a ‘tick-box’ exercise and the provision by Government of resource support to develop and provide the necessary technology. The proposal also needs to acknowledge that some people don’t have access to IT or are in areas with inadequate broadband (this could also apply to Neighbourhood Plans). Therefore, web-based plans should complement existing planning processes rather than completely replace them. There is also a question of the level of financial investment that will be needed at a time when Council budgets are under substantial pressure as a result of COVID-19. Additional funding and resources (e.g. update of Planning Portal) from Central Government and investment in GIS and other digital tools will be required in order to be able to achieve this ambition. Further details are required as to whether there will be funding available to local authorities to be able to make this transition to web-based Local Plans. A standardised format for these new style of plans would be useful to inform plan making and provide consistency between areas.</p>
<p>12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?</p> <p>No</p>	<p>The City Council does not support this proposal in full, as the time-limited stages have insufficient opportunities for public engagement and consultation especially as members of the public do not see the Local Plan until it has been submitted to the Planning Inspectorate. This runs counter to the stated aims of the reforms which are to enable greater and more extensive public involvement in the process. Also, the key stage when the plan would be developed (Stage 2) is not likely to be long enough to achieve the level of assessment and planning needed to allocate ‘Growth’ areas, given that these would then gain automatic outline planning consent. Plan making is a complex process and it might not be possible to produce a credible plan with meaningful public consultation in this time scale, especially the first time new-style plans are produced.</p>

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	<p>On the other hand, the period for examination of the plan (9 months) may be generous, given the possible limitations on face to face discussion and the need for a much simplified Inspector's report. Concern is also raised that if an examination lasts 9 months, what would be the cost of this and is there sufficient resources in place at the Planning Inspectorate to be able to deal with such long examinations.</p> <p>Notwithstanding these concerns, the City Council would wish to work with Government to improve the proposals and is at an early stage of local plan production. Therefore it puts itself forward as a possible pilot local plan, subject to financial resources being made available to assist the process.</p>
<p>13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?</p> <p>Greater clarity required.</p>	<p>There is a general lack of information in the White Paper about the continuing role of Neighbourhood Plans and how they would fit into the new system. From the City Council's experience there has been limited take-up of Neighbourhood Plans (less than 40% of those started nationally have been completed), so it is open to debate as to whether the support given by Government is likely to be well suited to the wider changes being consulted on. It does not, therefore, seem appropriate to extend them to smaller areas, although there may be a more useful role for local communities in producing local design guidance and codes when new style plans are produced. Greater clarity is required therefore if it is the Government's intention to retain NDPs.</p>
<p>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?</p>	<p>If neighbourhood plans are to be retained it would make sense for them to be changed in a similar way to local plans. It is, however, questioned why there are no time limits proposed on neighbourhood plan production, unlike local plans. Please see also answer above.</p>
<p>14. Do you agree there should be a stronger emphasis on the build out of developments? And</p>	<p>The City Council supports the principle of improving the build-out of development but the measures proposed appear very limited and</p>

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<p>if so, what further measures would you support?</p> <p>Yes</p>	<p>unlikely to prove effective as it is the developers not the LPA that control the build out of sites. There appear to be no sanctions if the developer stops delivering homes at the agreed rate. The White Paper seems to place the responsibility for delivery on developers, but has no clear proposals to improve delivery or prevent land-banking and slow build-out rates, and still requires local authorities to achieve housing completions through the Housing Delivery Test.</p> <p>There need to be clear incentives and sanctions imposed on landowners/developers to implement major development in a timely way, and penalties where it is not, although it is accepted that it is difficult to devise these. Where automatic outline consent is granted in Growth areas, there should be short deadlines for commencement, along with phasing requirements, although this would be difficult in the planned absence of s106 agreements (a legal agreement of some sort would have to accompany any Growth area designation proposed in a Local Plan). There should be penalties for developers who land-bank or don't implement automatic permissions within a set timescale, or start development only to keep the permission alive, including the ability to require developers to complete a scheme or allowing the planning authority to appoint another developer. Alternatively, LPAs should be given the ability to start charging Council tax on sites that have been granted planning permission as this would act as a real incentive for developers to build and sell more homes at a faster rate. It may also be possible for the charging rates of the proposed Infrastructure Levy to be linked to build out rates to promote faster delivery.</p>
<p>15. What do you think about the design of new development that has happened recently in your area?</p>	<p>From WCC's experience the greatest concern is not the quality of the development built but infrastructure delivery which can sometimes lag behind leading to development taking place without sufficient supporting infrastructure. There needs to be a better system in place</p>

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	<p>that ensures that developers provide FTTP broadband, EV parking, non-car modes of transport, including walking and cycling and public realm improvements. It also needs to be recognised that cost of infrastructure often increases if sites are located further away from already developed land.</p>
<p>16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?</p> <p>Less reliance on cars and promotion of public transport and active transport modes / Energy efficiency of new buildings and defining sustainable employment zones</p>	<p>The proposals do not make sustainability, climate change, non-carbon heating, renewable energy sources or biodiversity net gain key priorities. There is no description of how these issues will be at the heart of the proposed reforms. Also, the proposals are focussed on housing development, design, and beauty - with little mention of the importance of supporting and promoting low carbon employment development. The government's proposals also fail to pick up on the point that in order to lower our carbon footprint, we should be promoting mixed use development and low carbon employment which enables people to travel less and to live and work locally.</p> <p>The City Council has a target of achieving carbon neutrality in its District by 2030 and has produced a Carbon Neutrality Action Plan which includes actions to decarbonise transport, energy and buildings, and reducing the total energy usage across these sectors. It also includes the aim of setting policies for development standards and land use that reduce carbon and increase sustainability. The City Council considers the Government's target of net zero by 2050 to be inadequate. Local authorities should be able to include LP policies which pursue more ambitious carbon neutrality targets than those set nationally.</p> <p>It is disappointing that the 'Future Homes Standard' does not require zero carbon and that there is no response yet to the consultation that</p>

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	<p>took place last year. The references in the White Paper to ‘review the roadmap to the Future Homes Standard’ and ‘explore options for the future of energy efficiency standards, beyond 2025’ are far too vague and there is a real lack commitment in the proposals about how they will tackle climate change. Given that they could result in further delay or dilution of the Future Homes Standard it is essential that local authorities are able to introduce local policies setting ambitious carbon reduction standards in local plans. The new style Local Plan could only reflect local distinctiveness if the NPPF reflected the local council’s Strategy/Plan.</p> <p>The proposals make little reference to the desirability of achieving biodiversity net gain in development proposals or ensuring delivery of strategic green infrastructure networks. NPPF policy, as well as LP policy and design codes should ensure these issues are planned for, in order to achieve sustainable development.</p>
<p>17. Do you agree with our proposals for improving the production and use of design guides and codes?</p> <p>Yes</p>	<p>The City Council broadly supports these proposals but more clarity is needed to ensure that the developer’s delivery of buildings does not ‘hold the power’ over the Local Planning Authority, and support would be subject to the quality of the National Model Design Code. The Council is concerned that the scope for innovation, local distinctiveness and ‘quirkiness’ could be lost if design simply looks backwards, with design codes in older areas risking pastiche designs, rather than forwards in terms of how proposals should address climate change and follows a national model or what may be ‘provably popular’ locally. It is also unclear how local popularity necessarily leads to good contemporary design, how popularity would be determined and how local guidance is approved; would they need to go through some sort of public referendum process in which case there would be resource/timing issues?</p>

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	<p>The scale of work needed to produce these guides and codes for an area the size of Winchester district will also present a massive challenge if the aim of providing clarity on what form of development will be acceptable in each location is to be delivered. Also, the timescale for producing plans needs to allow for design codes to be developed simultaneously. See also the response to Q5 above re: zoning approach to new local plans.</p> <p>There can be significant changes in character that would need to be identified/supported in a design code within a small geographical area and indeed within a settlement (character zones). Loss of these distinctions would lead to loss of local distinctiveness. This could result in very complex and or unwieldy design codes which would be resource and time intensive to produce.</p>
<p>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?</p> <p>Yes</p>	<p>The City Council generally supports these proposals but would highlight the need for adequate financial resources and training. It is not clear whether the appointment of a chief officer for design in each authority would be more effective than appointing or training officers at a lower level, or whether a national body would be needed if this proposal is implemented.</p>
<p>19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?</p> <p>Yes</p>	<p>The City Council's experience is that Homes England already has a strong design emphasis but this proposal is supported, particularly if it enables Homes England to provide assistance with major growth proposals.</p>
<p>20. Do you agree with our proposals for implementing a fast-track for beauty?</p> <p>No</p>	<p>The City Council expresses concerns about this concept, particularly the use of pattern books and permitted development for standard development types. While giving weight to local masterplans and codes is supported in principle, along with the aim of achieving beauty, this is a very difficult concept to define and beauty, as a concept, is subjective. Also, a standardisation approach may tend</p>

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	<p>more towards 'acceptability' rather than 'beauty'. There is a danger that national patterns and standardised development forms could be imposed on local areas unless and until they were in a position to modify them by producing local orders (though an as yet unknown process). This runs counter to the stated intention of the reforms and there is concern for safety and LABC independent building control.</p> <p>This question should not just be restricted to implementing a fast-track for beauty when another major priority for the City Council and the government should be promoting carbon free development. As this is a major priority, the City Council would like the government to consider including a fast-track process for carbon free development.</p>
<p>21. When new development happens in your area, what is your priority for what comes with it?</p> <p>See comments in response column.</p>	<p>In a rural district where the residents and businesses face not only towards the city of Winchester and the market towns, but also out of district to Andover, Basingstoke, Eastleigh, and Fareham, we are reluctant to give a single response, as different types and scales of development will require different infrastructure provision, mixes of uses and affordable housing provision. Health provision is mentioned in the White Paper but frequently, even though developments offer land for local health facilities, the NHS is not prepared to provide a building and staffing there. Other matters may also be important such as climate change considerations, energy efficiency and nutrient neutrality. Healthy communities include providing a wide range of sustainable infrastructure to support; cycling, walking, improved public realm, public transport, country parks, trees and green infrastructure which supports biodiversity, community buildings, park and ride, broadband, water, wastewater treatment, power delivery, street lighting, schools, delivery of a 15 minute neighbourhood, etc. The City Council emphasises the need for local discretion about priorities and recognition that these may be different in different areas or for</p>

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	<p>particular types of development.</p> <p>It is extremely disappointing that there is a no mention in the White Paper of sustainable transport corridors, green infrastructure, living locally and providing high speed broadband to premises as a norm.</p> <p>It is also important that infrastructure, mixed uses and affordable housing are always provided as part of the development and on-site wherever possible, as financial contributions are no substitute for providing affordable housing directly, improved roads, drainage, open space, etc as development takes place. The White Paper is not clear about how on-site infrastructure would be provided under the new system and this could be a particular issue on larger or more complex sites, especially where they are in multiple ownerships.</p>
<p>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?</p> <p>Much greater clarity needed.</p>	<p>The City Council is extremely concerned that there is a general assumption in the proposals that the LPA is a commissioning authority for all types of services/infrastructure which is clearly not the case and greater clarity should be provided on how on-site infrastructure and affordable housing would be provided under the new system. Infrastructure which forms an essential part of the development such as roads, drainage water supply/disposal, and open spaces, etc must continue to be provided alongside development, not funded separately through the new Levy.</p> <p>Otherwise there could be a real disconnect between the development being built and essential facilities being provided. A developer would need to construct a road in order to build properties so it would be illogical to have this dealt with by the Infrastructure Levy. Water supply and foul drainage are dealt with by the utility companies so again it needs to be clear that these are covered by separate mechanisms and they would not be included in the Infrastructure Levy.</p>

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	<p>There is also a concern about whether s106 would still be available to cover essential non-infrastructure matters, such as the phasing of development, site/off site mitigation (compliance with habitat regulations where contributions are needed to ensure the potential impact of development on protected areas is mitigated so permission can be granted – in south Hampshire nitrates and recreational impact of residential developments on the protected environment of the Solent are two examples), travel plans, etc. Otherwise, a national Levy could be more straightforward but much would depend on how the Levy was set and the level of the ‘de minimis’ threshold.</p> <p>The City Council would also question, with the DTC being abolished, how it is envisaged by the government that cross border infrastructure issues would be dealt with under the proposals.</p>
<p>22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?</p> <p>Locally</p>	<p>Infrastructure levy rates should be set locally, as this will reflect the differing property values in different regions. A development needs to be financially viable to be able to afford the existing Community infrastructure Levy, (if applied by a collecting authority) so if it was set too high in areas with lower property values the development would be unviable. If it was set too low in areas where property values are high then the levy may not raise enough to be able to provide the affordable housing and infrastructure required.</p>
<p>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</p>	<p>The City Council would want the new Infrastructure Levy to capture at least the same amount overall as CIL/s106 and would like to see this increased. It recognises that in order to protect development finances it may be necessary to increase the amount sought from the new</p>

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<p>communities?</p> <p>More value</p>	<p>Levy over a period of time, with the aim of gradually increasing infrastructure contributions and decreasing land values.</p> <p>It will also be important that as the Infrastructure Levy would not be payable until occupation, it will need to deal with any increases in house prices when the price of houses increases in subsequent phases as large sites usually have a long build out time. This could act as real incentive for a developer to deliver houses at a faster rate if the formula captured any increases in house prices (i.e. the cost of the Infrastructure Levy increased if a development was not built out at certain agreed rate).</p>
<p>22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?</p> <p>Yes</p>	<p>The City Council supports the general principle for the ability to borrow against future Levy income, but the proposal that the Levy is paid on occupation of development could cause a lag between development taking place and the provision of affordable housing and infrastructure. It may also be more difficult to enforce than 'up-front' payments. This would carry a great deal of risk to the LPA if development rates, and therefore levy income, were to stall or there was a downturn in the market, leaving local authorities with unsustainable levels of debt. Further clarity is required on this point and what measures would be put in place by the government if this situation did arise otherwise we envisage that there would be limited take up and support for this proposal.</p>
<p>23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?</p> <p>Yes</p>	<p>The City Council would support this proposal. Development which occurs through PD still has the same needs and impacts as market development which goes through the planning process and shouldn't be exempt from making contributions where appropriate.</p>
<p>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-</p>	<p>The City Council strongly supports the aim of securing at least as much affordable housing from the new Levy and of achieving maximum on-site provision. The amount of affordable housing</p>

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<p>site affordable provision, as at present?</p> <p>Yes</p>	<p>secured should be set locally as outlined in the answer to 22 b. It is also important that the tenure of the affordable housing provided, including social and affordable rented, is agreed locally to reflect local housing need.</p> <p>In our experience, affordable rented accommodation is the tenure in most demand as it is accessible to people in the greatest housing need. This is a particular issue in rural areas where there is limited provision of affordable rented housing to meet local needs.</p>
<p>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?</p> <p>Yes</p>	<p>The City Council supports 'in-kind' provision of affordable housing on-site.</p>
<p>24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?</p> <p>Yes</p>	<p>The City Council considers that there should be mitigation against authorities having to overpay for in-kind delivery.</p>
<p>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?</p> <p>Yes</p>	<p>The City Council considers that the affordable housing would need to meet the Nationally described space standards, the National Design Guide and any locally agreed standards required for affordable housing. These include physical accessibility, sustainability, and the seamless integration of tenures in both design and location. The affordable housing should reflect local housing need, rather than sizes being dictated by developers. Affordable housing provided in this way should not be able to be sold off after a specific period.</p>
<p>25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?</p>	<p>While the City Council supports greater flexibility this should not be to the extent that Levy funds could be spent on non-infrastructure / affordable housing projects. There is a danger that the integrity of the</p>

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Greater clarity needed.	planning system could be undermined if the Levy were viewed simply as a form of local taxation that could be used for any council function.
25(a). If yes, should an affordable housing 'ring-fence' be developed? Greater clarity needed.	If greater flexibility were adopted there would need to be a ring-fenced proportion set aside for both affordable housing and essential infrastructure that is required in order to make the development acceptable (i.e. money for schools/community facilities/roads, etc).
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?	<p>There is absolutely no mention of housing provision for the gypsy and traveller community in the White Paper which is a major oversight in terms of the Equality Act. The Government needs to provide greater clarity over how the housing needs of specific groups, e.g. travellers, would be catered for in the new system, given the centralised housing requirements and simplified local plan procedures.</p> <p>Those who do not find digital communications easy may be prejudiced if there is an over-reliance on IT based planning. All advertisement is proposed online, but our experience is that a variety of communication methods is the most effective form of consultation.</p>