

Planning for the Future: Consultation Response

About You

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Are your views expressed on this consultation your own personal views or an official response from an organisation you represent?	Organisation: Croydon Alliance of Residents' Associations Position: Chair
What region of England are you located in? (Select one)	London

Pillar One – Planning for Development

Q1. What three words do you associate most with the planning system in England?	1. Biased (in favour of developers, not residents) 2. Onerous 3. Convoluted
Q2. Do you get involved with planning decisions in your local area? (Select One)	Yes
Q2 (a) If no, why not? (Select One)	N/A
Q3. 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? (Select One) Social Media Online News Newspaper By post Other (please specify):	<p>– Website and ability to subscribe to email notifications for specific roads or areas, as now (but more map-based with ability to draw your own defined area).</p> <p>Omitting or curtailing a key stage of the process, as you propose, will make it harder to contribute our views. Communities have a right to participate in plans and decisions on planning proposals. The planning system is there to serve <u>the public interest</u>, not favour one sector, such as landowners or developers, over another.</p>

<p>Q4. What are your top three priorities for planning in your local area? (Please select only three answers)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Building homes for young people <input type="checkbox"/> Building homes for the homeless <input type="checkbox"/> Protection of green spaces <input type="checkbox"/> The environment, biodiversity and action on climate change <input type="checkbox"/> Increasing the affordability of housing <input type="checkbox"/> The design of new homes and places <input type="checkbox"/> Supporting the high street <input type="checkbox"/> Supporting the local economy <input type="checkbox"/> More or better local infrastructure <input type="checkbox"/> Protection of existing heritage buildings or areas <input type="checkbox"/> Other – please specify: 	<p>1. The environment, biodiversity and climate change</p> <p>2. More or better local infrastructure</p> <p>3. Increasing the affordability of housing</p>
<p>Q5. Do you agree that Local Plans should be simplified in line with our proposals?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>There's not enough detail as to how the proposed zoning system will work in practice. It won't work if it's too high level i.e. town or ward level zoning; it must operate at neighbourhood level (a neighbourhood should be defined as an area with all required amenities within a 20 minute walk /cycle / public transport ride).</p> <p>As well as the overarching National Planning Policy Framework, in Greater London we have a two-tier planning system, with both a London Plan and a Local Plan (and they are out of sync in terms of timing). It's not clear whether the two-tier system will continue under the new proposals, and therefore the potential impact cannot be properly assessed.</p> <p>Local Plans are currently lengthy, complicated and slow to adapt to changing circumstances. An overhaul of the planning system is definitely required but control needs to be vested in local communities, not central government.</p> <p>Local Plan policies must be sufficiently detailed and tailored to local circumstances, challenges and opportunities in order to deliver new homes and supporting infrastructure, whilst meeting broader objectives such as:</p> <ul style="list-style-type: none"> - the need for healthy, resilient communities - achieving a net zero carbon target - the protection of green space, wildlife and the natural environment - the revitalisation of derelict or underused brownfield sites.
<p>Q6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?</p> <p>Yes No</p>	<p>No</p> <p>Centralising planning feels anti-democratic. We want greater community involvement and participation, not less.</p> <p>A move to a more rules-based system rather than discretionary decisions sounds good in theory but it's unclear how this would work in practice. Automatic screening is no substitute for human judgment for many planning matters, which require careful consideration and appraisal coupled with local knowledge.</p>

<p>Not Sure Please provide supporting statement</p>	<p>However, it should be impossible for developers to submit any development proposals that do not comply with prescribed standards for (say) minimum internal floor space, outdoor private amenity space, child play space, sunlight/daylight levels, tree canopy cover or natural green space. We need to stop building sub-standard homes because this is all we can squeeze into the available space; after all, less than 10% of the UK is built land.</p> <p>A democratically elected planning committee (proportionally representative of the local area) would improve decision-making. Also, the local community should have equal speaking rights to Council officers when proposals are being presented to committee.</p>
<p>Q7(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 No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>“Sustainable” sounds subjective and could be open to interpretation / abuse.</p> <p>Sustainable development is about integrating environmental, economic and social objectives, not trading them off against one another. The proposals put economic growth ahead of the well-being of people and the environment.</p> <p>If feasible, a statutory sustainable development test aimed at ensuring that environmental, economic and social objectives are successfully integrated would be welcome.</p>
<p>Q7. (b) How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?</p>	<p>By ensuring that strategic, cross-boundary projects have a separate budget allocated by central government, and an independent body to oversee the delivery of such projects.</p>
<p>Q8. (a) Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>No</p> <p>The idea that one size fits all is flawed.</p> <p>There are huge concentrations which have affected the property market e.g. London and the South-East. These areas have the greatest affordability constraints, where house prices are most out of kilter with incomes, and are therefore unlikely to be the most sustainable locations to develop, yet under the proposed approach these areas would have to plan for a greater number of homes.</p> <p>Under the new proposals for a standard method, new homes would need to be delivered in areas which have already shouldered significant housing growth in recent years. These are areas where road infrastructure is creaking, where school places are oversubscribed and where access to medical care is already exceedingly difficult. This is unsustainable, in every sense of the word.</p>
<p>Q8. (b) Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the</p>	<p>Not sure</p> <p>Covid-19 has changed how we work and is starting to change where we want to live, which will affect the quantity of development to be accommodated in any given area.</p>

<p>quantity of development to be accommodated?</p> <p>Yes</p> <p>No</p> <p>Not Sure</p> <p>Please provide supporting statement</p>	<p>The quantity of development should be based upon an assessment of local needs alongside a place's capacity to accommodate development based on the <u>availability of infrastructure and services</u>, in accordance with NPPF para 122.</p> <p>Simply building more homes won't make them more 'affordable' as developers are unlikely to flood the market to a level that would make house prices fall.</p> <p>In London & the South East developers are currently building as many units as possible on a site, driven by economic objectives. Standards are being compromised as focus is on number of units, not quality and sustainability. Environmental and social objectives have to be 'negotiated' by planners and are seen as a burden by developers.</p> <p>Make better use of digital technologies to drill down to neighbourhood level planning, targets and monitoring. Targets must include <u>typologies and tenures, not just number of units</u>, so that we build the right properties in the right place, with the right infrastructure to support it.</p>
<p>Q9. (a) Do you agree that there should be automatic permission in principle for areas for substantial development (<i>Growth areas</i>) with faster routes for detailed consent?</p> <p>Yes</p> <p>No</p> <p>Not Sure</p> <p>Please provide supporting statement</p>	<p>No</p> <p>All permitted development rights should be stopped; they are a developers' charter.</p> <p>Evidence from academics, sector representatives and government-commissioned research highlights the poor planning outcomes of homes delivered through permitted development rights. Shortcomings include poor design; failing to meet basic space standards; poor residential amenity; lack of affordable housing contributions; impact on business; and lack of infrastructure. The best way to ensure the level of scrutiny required to address these unacceptable impacts on our environment, health and well-being is to require a planning application and scrap permitted development rights or automatic permission in principle.</p> <p>No developments should be exempt from adhering to standards / providing required amenities for future occupiers / contributing to green and built infrastructure and social housing; this is best controlled by a robust planning system, coupled with good building control and enforcement.</p> <p>Development management is not the barrier to homes getting built. Developers are always chasing greater profits and will sit on land with or without planning permission in order to maximise profits. Developers see environmental and social objectives as (unwelcome) reductions to their profit margins, and will always look for projects where such objectives are not a consideration, such as the replacement of a family-sized dwelling with a block of flats with no affordable housing element.</p> <p>All development needs to be subject to the same environmental and social constraints e.g. 30% tree cover or 40% green space, minimum GIA and amenity standards, daylight / sunlight standards, contribution to local</p>

	<p>infrastructure including green infrastructure, contribution to social housing (either as a levy or for larger developments as direct provision).</p> <p>The redevelopment of industrial and commercial brownfield sites should be fast-tracked and incentivised, to discourage the piecemeal demolition and redevelopment of existing (perfectly habitable) residential properties.</p> <p>The building of homes for the homeless should also be fast-tracked.</p>
<p>Q9(b). Do you agree with our proposals above for the consent arrangements for <i>Renewal</i> and <i>Protected</i> areas ?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>No</p> <p>All permitted developments should be stopped; they only benefit developers.</p> <p>No developments should be exempt from adhering to standards / providing required amenities for future occupiers / contributing to green and built infrastructure and social housing; this is best controlled by a robust planning system, coupled with good building control and enforcement.</p> <p>Building on greenfield sites should be disincentivised.</p> <p>In terms of <i>protection</i>, the law needs changing so that restrictive covenants are a planning consideration instead of having to be privately enforced i.e. developers should not be allowed to build on land that has a restrictive covenant prohibiting building, or certain types of buildings. The default legal position should be that existing restrictive covenants apply, unless developers apply to the Upper Land Tribunal to get them removed and no affected parties object.</p>
<p>Q9(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>Yes No Not Sure Please provide supporting statement</p>	<p>Yes</p> <p>With increased use of digital technologies, more people will be able to work from home and will not be constrained by the need to live within a reasonable commuting distance of a fixed place of work (currently often concentrated around large towns and cities).</p> <p>New settlements should consist of liveable, sustainable 20-minute neighbourhoods. It is imperative that the appropriate infrastructure is in place to support these settlements, so that they are not reliant on cars.</p> <p>The provision of large-scale new infrastructure to support these new 'eco-settlements' needs to be overseen by an independent central body, not local councils.</p>
<p>Q10. Do you agree with our proposals to make decision-making faster and more certain?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>Faster decision-making would be ideal but not at the cost of democratic public scrutiny and consultation. Communities have a right to participate in plans and decisions on planning proposals. The planning system is there to serve <u>the public interest</u>, not favour one sector, such as developers.</p> <p>Currently slow decision-making is often due to under-funding of local authorities and an excess of (inappropriate or sub-standard) development proposals.</p>

	<p>The presumption in favour of sustainable development is already abused (with the requirement for it to be <u>sustainable</u> often forgotten).</p> <p>Of particular concern is the suggestion that detailed planning decisions be delegated to planning officers where the principle of development has been established. While it is important that planning and other specialists have oversight of / advise on detailed matters, they should inform, not decide, applications (other than minor non-contentious ones). Public participation and democratic scrutiny are integral to our current system and necessary in order for decisions to be fair, transparent and robust. Under the reformed system as proposed, the democratic scrutiny and public participation that occurs in relation to specific planning proposals — a key plank of our current system —stand to be lost. This cannot be right.</p> <p>The proposal that applicants will be entitled to an automatic rebate of their planning application fee if they are successful at appeal is unfair as it will deter cash-strapped local authorities from refusing to grant permission for an application they consider to be poor. Reaching a planning decision is not always black and white and will depend on the weight to be given to different factors. Such a rebate should only be required where a council's planning decision is deemed unreasonable by an Inspector on material planning grounds. The community should also have a right to appeal, as developers do, unless the decision-making body is democratically elected by proportional representation.</p>
<p>11. Do you agree with our proposals for digitised, web-based Local Plans?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Yes</p> <p>The planning system should definitely make greater use of digital technologies. Targets should be set and monitored at a neighbourhood level, with targets defining the <u>appropriate mix of typologies and tenures</u>. This will prevent developers focusing only on more profitable areas / schemes / typologies.</p> <p>In addition, interactive mapping should be used to capture local evidence about surface and foul water flooding, which should then inform the Local Plan.</p> <p>The use of digital technologies must supplement but not replace human interaction. Care must be taken not to disadvantage particular groups. In-person events should continue as they provide for a level of engagement and discussion that may not be achievable through digital technologies.</p>
<p>Q12. Do you agree with our proposals for a 30 - month statutory timescale for the production of Local Plans?</p> <p>Yes No Not Sure</p>	<p>Not sure</p> <p>Local Plan policies must be sufficiently detailed and tailored to local circumstances, challenges and opportunities in order to deliver new homes and supporting infrastructure, whilst meeting broader objectives, such as the need for healthy, resilient communities, achieving a net zero carbon target and the protection of green space, wildlife and the natural environment. This level of detail plus the need for a community</p>

Please provide supporting statement	<p>consultation process will inevitably take time, but there needs to be a way that Local Plans can adapt more quickly to changing circumstances.</p> <p>Under ‘alternative options’, the possibility of removing the right to be heard is mentioned. Maintaining the right to be heard is essential if communities are to retain a meaningful influence and role in plan-making. This right enables individuals and groups to engage in person alongside other stakeholders and provides for thorough public scrutiny of policies, evidence and proposals. The deliberation and discussion that occurs at examinations in public helps foster consensus and ultimately leads to better thought out plans and policies.</p>
<p>Q13. (a) Do you agree that Neighbourhood Plans should be retained in the reformed planning system?</p> <p>Yes No Not Sure</p> <p>Please provide supporting statement</p>	<p>Yes</p> <p>Planning should be done at the neighbourhood level, with greater community involvement. The role of Neighbourhood Plans should continue as now or be enhanced, not restricted in the manner proposed. Neighbourhood Plans have an important role to play in setting local policies tailored to the needs of their neighbourhood and can foster community ownership of and engagement with planning.</p> <p>However, the costs involved in drawing up a Neighbourhood Plan are currently prohibitive for most communities.</p>
<p>Q13 (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>Digital tools should enable greater community engagement, but currently in Croydon the views of residents are largely ignored even when a public engagement process has taken place.</p> <p>Communities should be empowered to draw up Neighbourhood Plan policies that require development to be zero carbon, nature friendly and meet requirements for affordable housing, workspaces, community facilities and other land use needs, including any community-led schemes and initiatives.</p> <p>Residents have been excluded from truly shaping the places that they live in. Despite public consultation exercises, power still resides with those who have something to gain financially or politically e.g. local political parties, developers, local authorities, national departments, etc.</p> <p>What constitutes good design is a subjective matter, and not all proposals will please all residents all of the time.</p> <p>A democratically-elected (using proportional representation) local decision-making body to replace the Council’s planning committee would help.</p>
<p>Q14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?</p>	<p>Yes</p> <p>According to the Local Government Association, over 1 million homes consented in the last decade remain unbuilt. New research from housing charity Shelter has found that 40% of permissions granted have not been built out.</p>

<p>Yes</p> <p>No</p> <p>Not Sure</p> <p>Please provide supporting statement</p>	<p>Too many landowners and developers are able to bank undeveloped land for economic reasons. Some developers have over 10 years of housing supply in their land banks. Introduce greater differentiation in <u>types and tenures</u> of new homes to increase market absorption and increase build-out rates (as recommended by Letwin review 2018).</p> <p>Further measures could include:</p> <ul style="list-style-type: none"> - an annual undeveloped land levy, with higher rates for land with extant planning permission - charging council tax on undeveloped plots - tighter control on the purchase of restrictive options - tighter rules on foreign buyers - a ban on land purchases by offshore shell companies.
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Pillar Two – Planning for Beautiful and Sustainable Places

<p>Q15. What do you think about new development that has happened recently in your area? (Select One)</p> <p>Not sure / indifferent Beautiful / well-designed Ugly / poorly-designed o There hasn't been any Other (please specify):</p>	<p>Other - unsustainable</p> <p>There are many different examples of development of all types in Croydon, but many are considered ugly, poorly-designed and out of character with the area. For example, there are a lot of blocky new builds with (cheaper) flat roofs in areas where the prevailing character is traditional dwellings with pitched roofs. There are also too many developments with insufficient parking provision in areas that have poor or very poor access to public transport.</p> <p>Very little new development is truly sustainable i.e. zero carbon, nature friendly with sufficient affordable housing and affordable workspace, accessible green space and served primarily by public transport, walking and cycling. New housing developments are often delivered on the outskirts of towns/cities, perpetuating the reliance on cars, with providing limited new green space, integration with public rights of way, cycle paths etc. This has to stop if we are serious about tackling the climate and ecological emergency and planning for a green, fair recovery.</p> <p>The concept of beauty and what constitutes good design is a subjective matter, and not all proposals will please all residents all of the time. Such a subjective concept cannot be prescribed by law.</p>
<p>Q16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? (Select One)</p> <p>Less reliance on cars More green / open spaces Energy efficiency of new buildings More trees o Other (please specify):</p>	<p>Other – All of the above</p> <p>A reduced reliance on cars cannot happen without the necessary infrastructure in place to provide viable cost-effective alternatives.</p> <p>All developments should contain a minimum of 30% tree cover or 40% green space.</p> <p>All new buildings must be future-proof and climate-resilient and use only renewable energy sources. Building to a net zero specification NOW is cheaper than retrofitting in the future.</p>
<p>Q17. Do you agree with our proposals for improving the production and use of design guides and codes?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>We have an “award-winning” design guide in Croydon and it is either ignored when it suits the decision-makers (because “there’s a housing crisis”) or used as an excuse to allow “design-led” proposals that are contrary to the Local Plan and /or other documents in the planning framework.</p>

<p>Q18. 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 No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>We've had such officers at Croydon Council and it hasn't prevented unsustainable piecemeal over-development in inappropriate locations.</p> <p>Croydon has a design code and good place-specific policies but they are routinely ignored by the decision-makers "because there is a housing crisis". Policies, strategies, theories and guides are all well and good – but in practice there's too much compromise, because ultimately it comes down to numbers. We need to get away from the target-driven approach. It is not appropriate to build unsustainable and sub-standard new homes. You're allowing developers to get away with prioritising profit over people's well-being.</p>
<p>Q19. 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 No Not Sure Please provide supporting statement</p>	<p>Not sure</p>
<p>Q20. Do you agree with our proposals for implementing a fast-track for beauty?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>No</p> <p>Beauty is a subjective matter which doesn't fit within a rules-based system and cannot be prescribed by law.</p> <p>There should be a fast track for homes for the homeless, and for redevelopment of derelict or underused brownfield sites.</p>

Pillar Three – Planning for Infrastructure and Connected Places

<p>Q21. When new development happens in your area, what is your priority for what comes with it?</p> <p>More affordable housing More or better infrastructure (such as transport, schools, health) Design of new buildings More shops and/or employment space Green space Don't know Other (please specify):</p>	<p>More or better infrastructure (such as transport, schools, health)</p>
<p>Q22. (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>Yes No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>A consolidated infrastructure levy makes sense, and the existing systems certainly need reform. The current s.106 and CIL systems are inherently flawed but your proposals do not address the underlying issues.</p> <p>The most pressing issue that needs to be fixed is that <u>infrastructure needs to go where the development and concomitant population growth is happening</u>. This is even more critical in overpopulated areas such as London. We need to create sustainable, liveable neighbourhoods that do not rely on cars. Infrastructure must be in the right place so that we move towards 20-minute neighbourhoods; this must be the gold standard for urban planning in order to combat climate change, foster communities and encourage healthier lifestyles.</p> <p>It should not be lawful for local authorities to spend infrastructure money raised in one area on infrastructure in another part of the borough. Either reverse the current percentages (85% to be spent in originating ward, 15% allocated to the borough-wide pot) or establish rules based on walking, cycling and journeys on public transport (or in the short-term, as a transitional measure, car journeys).</p> <p>A second flaw in the current system is that infrastructure projects are often cross-boundary or inter-agency. This leads to conflicting priorities and wrangles over budgets, and delays in delivery.</p> <p>Additionally, there needs to be greater public scrutiny and clarity on the extent of the infrastructure levy 'pot' (i.e. the amounts raised from developments) and the process for making bids to spend it, to encourage community-led initiatives.</p>

<p>Q22. (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>Nationally at a single rate Nationally at an area-specific rate Locally</p>	<p>Locally</p> <p>An infrastructure levy can't be set nationally, as there are significant variations in the cost of land and the cost of labour required to deliver that infrastructure.</p>
<p>Q22. (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?</p> <p>Same amount overall More value Less value Not sure Please provide supporting statement</p>	<p>Not sure</p> <p>The current system isn't delivering the necessary infrastructure, so it's difficult to judge if the amount of value captured is correct or not.</p> <p>A consolidated levy should probably capture more value than the current systems, to support greater investment in infrastructure, affordable housing and local communities.</p> <p><u>All developments should contribute, there should be no exemptions for smaller projects as this simply encourages developers to 'play the game' and exploit loopholes.</u></p> <p>A clearer audit trail is needed i.e. a publicly available dashboard monitoring receipts and expenditure / planned expenditure. The current annual monitoring reports in Croydon are unclear and insufficient; they illustrate how much has been collected and how much has been spent (separately), but not what the 'available balance' is and what infrastructure is planned. It's possible that s.106 and CIL receipts are being misappropriated.</p>
<p>Q22. (d) Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>Borrowing against the infrastructure levy to support infrastructure delivery makes sense to smooth out timing issues, but this must be tightly controlled.</p> <p>Croydon Council already has a disproportionately high level of debt. There should be caps on local authority levels of borrowing.</p>
<p>Q23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>Any development that adds to the local population should contribute towards local infrastructure.</p> <p>There should be no permitted development rights, but if these are continued, then changes of use should be liable to infrastructure levy.</p>

<p>Q24. (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?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>We need to deliver more affordable homes than we do at present. There should be higher levels of direct public investment but developers must also provide more by way of planning obligations. Loopholes whereby developers are able to avoid providing affordable housing through below-threshold projects or as a result of exercising permitted development rights must be closed, along with the spurious 'financial viability assessment' loophole.</p> <p>Provision of affordable housing should be a mandatory requirement that developers and landowners factor in from the outset when devising schemes and remain committed to on delivery.</p> <p>The government should not reduce requirements for SMEs, as proposed in the separate consultation regarding 'Changes to the Current Planning System' closing 1 October.</p> <p>Although mixed tenure communities should be delivered where possible, some developments may be inappropriate for affordable housing. The provision of affordable housing should be managed at local authority area level, not at individual development level. There is currently too much emphasis on every development meeting all requirements, when realistically there are differing needs at play.</p> <p>Developers should either contribute via a financial levy or via on-site provision, and ultimately the decision should rest with the local authority.</p>
<p>Q24. (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 No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>The Council should be able to agree whatever is in the best local interests, depending on the size mix of the development and local demand for affordable housing. The decision whether to accept a financial contribution, on-site provision or discounted purchases should ultimately rest with the local authority.</p>
<p>Q24. (c) If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>Control should reside with the local authority.</p>

<p>Q24. (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 No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>Control should reside with the local authority.</p>
<p>Q25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Not sure</p> <p>The current systems need to be reformed. It might be advisable to divide the infrastructure levy into discrete pots for transport, schools, medical facilities, etc.</p> <p>There should be restrictions on the amount that is spent on less critical infrastructure. At the moment too much is spent on 'nice to have' infrastructure e.g. public art or public realm improvements, rather than 'need to have' infrastructure such as major public transport improvements or new schools and medical facilities (because the latter types of project are more difficult to deliver).</p>
<p>Q25 (a) If 'yes', should an affordable housing 'ring-fence' be developed?</p> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Yes</p> <p>The affordable housing pot should definitely be separate from the infrastructure pot.</p> <p>In addition, <u>all</u> developments should be liable to affordable housing contributions, either by way of a financial levy or by way of the provision of a proportion of units on larger developments, depending on what meets the local demand.</p>

Equalities Impact

<p>Q26. 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> <p>Yes No Not Sure Please provide supporting statement</p>	<p>Yes</p> <p>Care must be taken to ensure that any changes still enable all groups to be involved in democratic scrutiny and public engagement processes.</p>
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Final Question

<p>Have you responded to a Government consultation before?</p>	<p>No</p>
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