

Planning for the Future The Implications for Housing



New Flats built in Kensington by Catalyst Housing Association

August 2020

Introduction

This briefing paper considers the Government's White Paper 'Planning for the Future' that was published in August 2020. It focuses especially on the implications for affordable housing.

The Planning for the future consultation proposes reforms of the planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed.

The White Paper sets out:

- Plans to overhaul the planning system and reform the way the country builds.
- Plans to streamline the process, cut red tape and harness technology to deliver homes faster.
- How valued green spaces will be protected for future generations, with more building on brownfield land.
- How government will ensure the building of beautiful homes with communities at the heart of a new planning system through local community agreements.
- A 30% discount through First Homes, with an emphasis on key workers.

**AWICS Ltd., Telephone: 017683-51498. Mobile: 07502-142658. Twitter: @AdrianWaite.
E-Mail: adrian.waite@awics.co.uk. Website: www.awics.co.uk**

Managing Director: Adrian Waite MA CPFA CIHM FInstLM. Registered office: c/o Butterworths Solicitors, 3 Walker Terrace, Gateshead, Tyne & Wear, NE8 1EB. Company Number: 3713554. VAT Registration Number: 721 9669 13.

The government considers that the current system is too sluggish in providing housing for families, key workers and young people and too ineffectual in obligating developers to properly fund the infrastructure – such as schools, roads and General Practitioner surgeries – to support them.

The government hopes that the changes will be a major boost to small and medium builders that they think are currently cut off by the planning process. The proportion of new homebuilding led by small and medium builders has fallen from 40% in 1990 to just 12% today. The government sees small to medium builders as key players in getting the country building on the scale needed to drive economic recovery, while leading housebuilding that is beautiful and builds on local heritage and character. They consider that the complexities of the planning process and its associated risks, delays and costs are the key challenges that small and medium builders face in homebuilding.

In launching the White Paper, Robert Jenrick, the Secretary of State for Housing, Communities & Local Government, said that an overhaul of England's planning system that will deliver the high-quality, sustainable homes that communities need will be at the heart of the most significant reforms to housing policy in decades. He said that:

“Our complex planning system has been a barrier to building the homes people need; it takes seven years to agree local housing plans and five years just to get a spade in the ground.

“These once in a generation reforms will lay the foundations for a brighter future, providing more homes for young people and creating better quality neighbourhoods and homes across the country. We will cut red tape, but not standards, placing a higher regard on quality, design and the environment than ever before. Planning decisions will be simple and transparent, with local democracy at the heart of the process.

“As we face the economic effects of the pandemic, now is the time for decisive action and a clear plan for jobs and growth. Our reforms will create thousands of jobs, lessen the dominance of big builders in the system, providing a major boost for small building companies across the country.”

The White Paper

The White Paper runs to 84 pages and contains the following sections:

- Ministerial foreword
- Introduction
- Pillar one – Planning for Development
- Pillar two – Planning for beautiful and sustainable places
- Pillar three – Planning for infrastructure and connected places.
- Delivering change
- What happens next?

The consultation lasts for twelve weeks from 6th August 2020 and concludes on 29th October 2020.

The government states that the reforms will mean that:

- Local communities will be consulted from the very beginning of the planning process. By harnessing the latest technology through online maps and data, the whole system will be made more accessible
- Valued green spaces will be protected for future generations by allowing for more building on brownfield land and all new streets to be tree lined

- Much-needed homes will be built quicker by ensuring local housing plans are developed and agreed in 30 months – down from the current 7 years
- Every area to have a local plan in place – currently only 50% of local areas has a plan to build more homes
- The planning process to be overhauled and replaced with a clearer, rules based system. Currently around a third of planning cases that go to appeal are overturned at appeal
- A new simpler national levy to replace the current system of developer contributions which often causes delay
- The creation of a fast-track system for beautiful buildings and establishing local design guidance for developers to build and preserve beautiful communities
- An ambition that new ‘zero carbon ready’ homes delivered under our new system will not require any future retrofitting.

The White Paper also sets out measures to achieve the following:

- Supply more land in the system, to enable more high quality homes to be built in the right places and to provide businesses and communities with the space to develop.
- Meet our climate change and environmental objectives, including through higher standards for new homes.
- Make the housing industry more diverse and competitive to drive delivery and higher standards by supporting innovative developers and housebuilders including SMEs and self-builders.

The government is also:

- Consulting on how local housing need is assessed.
- Consulting on proposals to extend the current exemption of small sites from having to make ‘section 106’ payments.
- Consulting on extending Permission in Principle to major development to give more developers access to a fast track route to secure the principle of development for housing.
- Publishing a call for evidence to seek views on proposals to help councils and local communities better understand who controls land in their area and to assist SME and new entrants to the housing market identify land suitable for development.
- Encouraging feedback from individuals and organisations as part of its consultation on the proposed measures.

The full consultation document is available at: www.gov.uk/government/consultations/planning-for-the-future

A second consultation on important short-term changes to the current planning system was also published. This is available at: <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

Robert Jenrick also confirmed that the First Homes scheme will provide newly built homes at a 30% discount for local people, key workers, and first-time buyers. The discount will be locked into the home in perpetuity, ensuring future buyers can continue to benefit from it.

A new and simpler system of developer contributions will also ensure private firms play their part in funding the new infrastructure and affordable homes that should accompany new building.

Section 106 agreements and the Community Infrastructure Levy will be replaced with a new Infrastructure Levy that will be a fixed proportion of the value of the development, above a set threshold, helping to deliver more affordable housing.

Revenues would be spent locally on projects such as new roads, upgraded playgrounds and discounted homes for local, first-time buyers.

**AWICS Ltd., Telephone: 017683-51498. Mobile: 07502-142658. Twitter: @AdrianWaite.
E-Mail: adrian.waite@awics.co.uk. Website: www.awics.co.uk**

Managing Director: Adrian Waite MA CPFA CIHM FInstLM. Registered office: c/o Butterworths Solicitors, 3 Walker Terrace, Gateshead, Tyne & Wear, NE8 1EB. Company Number: 3713554. VAT Registration Number: 721 9669 13.

The government considers that towns and high streets will also benefit from renewed development; because the reforms will speed up and simplify the process, breathing new life into vacant commercial properties and industrial spaces and, where desirable, transforming them into new homes.

Land would be designated into one of three categories - for growth, for renewal or for protection. Communities would set the agenda for their own areas, with the categories for all land across England decided through local consensus. Under the proposals:

- Land suitable for growth (probably covering most of England) will be approved for development at the same time that plans are prepared, meaning new homes, schools, shops and business space can be built quickly and efficiently, as long as local design standards are met.
- Renewal areas will enable much quicker development where it is well-designed in a way which reflects community preferences.
- Development on Green Belt land will continue to be restricted as it is now with policy remaining a decision for local authorities as they prepare their plans.

Pillar One – Planning for Development

The government considers that the starting point for an effective planning system is to establish a clear and predictable basis for the pattern and form of development in an area.

The current system of land use planning in England is principally based on Local Plans, brought forward by local planning authorities on behalf of their communities. But in contrast to planning systems in places like Japan, the Netherlands and Germany, where plans give greater certainty that development is permitted in principle upfront, plans in England are policy-based, with a separate process required to secure permission on the sites that it designates for development.

The government considers that Local Plans are a good foundation on which to base reform, as they provide a route for local requirements to be identified and assessed, a forum for political debate and for different views on the future of areas to be heard. In their view, the National Planning Policy Framework provides a clear basis for those matters that are best set in national policy. However, they think that change is needed because:

- Layers of assessment, guidance and policy have broadened the scope of Local Plans, requiring a disproportionate burden of evidence to support them. As a result, Local Plans take increasingly long to produce, on average over seven years; have become lengthier documents of increasing complexity, in some cases stretching to nearly 500 pages; are underpinned by vast swathes of evidence base documents, often totalling at least ten times the length of the plan itself, and none of which are clearly linked, standardised, or produced in accessible formats; and include much unnecessary repetition of national policy.
- It is difficult for users of the planning system to find the information they need, and when they do, it is difficult to understand. Few people read the array of evidence base documents which accompany plans and these assessments do not sufficiently aid decision-making. Much of this evidence becomes dated very quickly, and production times often render policies out of date as soon as they are adopted. Furthermore, even when the plan is in place, it cannot be relied on as the definitive statement of how development proposals should be handled.

The government considers that Local Plans should instead be focused on where they can add real value: allocating enough land for development in the right places, giving certainty about what can be developed on that land, making the process for getting permission for development as simple as possible, and providing local communities a genuine opportunity to shape those decisions. To this end, Local Plans should:

- Be based on transparent, clear requirements for local authorities to identify appropriate levels of, and locations for, development that provide certainty and that applicants and communities can easily understand
- Communicate key information clearly and visually so that plans are accessible and easily understandable, and communities can engage meaningfully in the process of developing them
- Be published as standardised data to enable a strategic national map of planning to be created
- Be developed using a clear, efficient and standard process
- Benefit from a radically and profoundly re-invented engagement with local communities so that more democracy takes place effectively at the plan-making stage
- Set clear expectations on what is required on land that is identified for development, so that plans give confidence in the future growth of areas and facilitate the delivery of beautiful and sustainable places.

Pillar Two – Planning for Beautiful and Sustainable Places

The government sets out they consider that a simpler planning process could improve certainty about what can be built where, as well as offering greater flexibility in the use of land to meet changing economic and social needs. But, they consider that improving the process of planning is only the starting point – they want to ensure that they have a system in place that enables the creation of beautiful places that will stand the test of time, protects and enhances the environment, and supports efforts to combat climate change and bring greenhouse gas emissions to net-zero by 2050.

Recent research from the Royal Town Planning Institute has set out the vital contribution that planning can make to a sustainable and inclusive recovery. To do this, planning should be a powerful tool for creating visions of how places can be, engaging communities in that process and fostering high quality development: not just beautiful buildings, but the gardens, parks and other green spaces in between, as well as the facilities which are essential for building a real sense of community. It should generate net gains for the quality of the built and natural environments - not just 'no net harm'.

As the report of the Building Better, Building Beautiful Commission has shown, all too often that potential has fallen short. Too many places built during recent decades fail to reflect what is special about their local area or create a high-quality environment of which local people can be proud. The Commission has played an invaluable role not just in highlighting the deficiencies, but in setting out a wide range of recommendations for addressing them.

The government intends to respond fully to the Commission's report in the autumn, but there are important aspects that they highlight now, as being integral to their proposals for what a revised planning system can achieve.

Pillar Three – Planning for Infrastructure and Connected Places

New development brings with it new demand for public services and infrastructure. The government considers that mitigating these impacts – by securing contributions from developers and capturing more land value uplift generated by planning decisions to deliver new infrastructure provision – is key for both new and existing communities. It is also central to their vision for renewal of the planning system.

At present, there are two broad routes for local planning authorities to secure developer contributions, both of which are discretionary for authorities: planning obligations and the Community Infrastructure Levy. Planning obligations – through Section 106 agreements – are negotiated with developers, and in 2018/19 were worth a total of £7billion, of which £4.7billion was in the form of affordable housing contributions – supporting delivery of 30,000 affordable homes. In contrast, the Community Infrastructure Levy is a fixed charge, levied on the area (floorspace) of new development, and secures infrastructure that addresses the cumulative impact of development in an area. The Community Infrastructure Levy is not mandatory for local planning authorities, and around half of authorities currently charge it. Levy rates are discretionary, established by assessments of infrastructure need and viability.

The government considers that there are several problems with this system. Planning obligations are broadly considered to be uncertain and opaque, as they are subject to negotiation and renegotiation based in part on the developer's assessment of viability. This creates uncertainty for communities about the level of affordable housing and infrastructure that development will bring. In turn, this brings cost, delay, and inconsistency into the process. This acts as a barrier to entry to the market, and major developers are better placed to devote the legal and valuation resource needed to negotiate successfully. The government considers that this unevenness is also a problem for local authorities, with significant variation in skill and negotiation in negotiating viability across authorities.

The Community Infrastructure Levy addresses many of these problems as it is a flat-rate and non-negotiable tariff, and developers and local authorities have, in general, welcomed the certainty it brings. However, as payment is set at the point planning permission is granted, and payment due once development commences, the government considers that it is inflexible in the face of changing market conditions. Payment before a single home has been built increases the developer's risk and cost of finance, creating cashflow challenges which are more acute for smaller developers. And despite early payment, many local authorities have been slow to spend Community Infrastructure Levy revenue on early infrastructure delivery, reflecting factors including indecision, competing spending priorities, and uncertainty over other infrastructure funding streams.

Securing necessary infrastructure and affordable housing alongside new development is central to the government's vision for the planning system. They are therefore proposing to bring forward reforms to make sure that developer contributions are:

- Responsive to local needs, to ensure a fairer contribution from developers for local communities so that the right infrastructure and affordable housing is delivered
- Transparent, so it is clear to existing and new residents what new infrastructure will accompany development
- Consistent and simplified, to remove unnecessary delay and support competition in the housebuilding industry
- Buoyant, so that when prices go up the benefits are shared fairly between developers and the local community, and when prices go down there is no need to re-negotiate agreements.

The Government could also seek to use developer contributions to capture a greater proportion of the land value uplift that occurs through the grant of planning permission and use this to enhance infrastructure delivery. There are a range of estimates for land value uplift currently captured, from 25% to 50%. The value captured depends on several factors including the development value, the existing use value of the land, and the relevant tax structure – for instance, whether capital gains tax applies to the land sale. The government considers that increasing value capture could be an important source of infrastructure funding but would need to be balanced against risks to development viability.

Responses from Industry

Matthew Fell, Chief UK Policy Director at the Confederation of British Industry, said that:

“Changes to the planning system will help ramp up the availability of homes in places where people need them most. These reforms will allow housebuilders to get to work, supporting supply chains, and more flexible, local labour markets around the country.

“Delivering high-quality, safe and environmentally friendly new homes is critical for meeting our climate targets while accelerating regional growth and tackling inequality. Affordability of future housing supply must remain at the forefront of these efforts.

“With coronavirus continuing to cast a shadow of uncertainty over the economy, a more flexible planning system must give local authorities and businesses scope to deliver the homes people need in the short term while laying the groundwork for sustainable communities for decades to come.”

James Thomson, Chief Executive Officer of Gleeson Homes, said that:

“We strongly support the reform of our historic planning system, to bring it up to speed and ensure it is fit for purpose for the modern-day. In particular, we welcome initiatives to make it more transparent, speed up planning where appropriate and has a presumption towards development rather than against. The renewed commitment to building 300,000 new homes a year is an important goal and will be aided by these new initiatives.

“At Gleeson, our focus is building low-cost quality homes in areas of regeneration and on brownfield land. The permission in principle initiative will help us to fast-track hundreds of new affordable homes for first-time buyers and essential workers on lower incomes who are eager to get a foot on the property ladder. Not only will these reforms go some way to supporting local SME housebuilders and their supply chains, but they will also help to ‘level-up’ the country through increased infrastructure investment, bringing jobs and homes to the north.

“It’s also promising to see the government renew its commitment to building well designed places for people to live and work, rather than just schemes that focus solely on density often to the detriment of place.”

Responses from the Local Government Sector

Cllr James Jamieson (Conservative, Central Bedfordshire Council), Chairman of the Local Government Association, said that:

“Councils are committed to ensuring new homes are built and communities have quality places to live. It is vital that these are delivered through a locally-led planning system with public participation at its heart which gives communities the power to ensure new developments are of a high standard, built in the right places, and include affordable homes. We also need to ensure that new homes are supported by new funding for community infrastructure such as schools, playgrounds and roads.

“Nine in ten applications are approved by councils with more than a million homes given planning permission over the last decade yet to be built. The system needs to ensure planning permissions are built. Any loss of local control over developments would be a concern. It would deprive communities of the ability to define the area they live in and know best and risk giving developers the freedom to ride roughshod over local areas.”

“We will need to look properly at these proposals in detail, but councils share the aspiration of improving the current planning system to provide greater certainty for communities, encourage brownfield development, to deliver better infrastructure and increase local involvement.

“It is vital that Government fully engages with and takes advantage of the expertise in local government to ensure that their aspirations of an improved system works in practice. We look forward to responding to this consultation in detail and working with government to ensure any reforms improve the system and protect the rights of communities to shape the areas they live in.”

“If we are to truly fix our chronic housing shortage, councils need the tools, powers and flexibilities to plan for and deliver the quality homes and places communities need.”

Tom Stannard, Corporate Director of Regeneration & Economic Growth at Wakefield City Council and spokesman on economic growth and housing for the Society of Local Authority Chief Executives & Senior Managers told the ‘Local Government Chronicle’ that there were some elements of the white paper that should be welcomed, such as the commitment to new homes being net zero by 2050 and ‘zero carbon ready’ by 2025. However, he said that coming after the expansion of permitted development rights over recent years it amounted to a ‘further limit on the powers of local planning authorities’ and the ‘dilution’ of councils’ place shaping role:

“It isn’t planning that’s stopping housing delivery... private housing doesn’t get delivered because of viability issues. Social housing doesn’t get delivered because it’s not profitable to do so. As a consequence, we need to intervene to accelerate delivery... Developers may criticise councils for being bureaucratic but the private sector appreciates and uses the ability to bilaterally negotiate with local authorities.”

“I can’t really see (the proposed national levy) being a truly nationally set charge because in reality it would have to be a national formula that was capable of local flex... How will the private sector work with the national system? Barratts, Persimmon etc will all be able to go straight to MHCLG rather than coming to local authorities, but I fear it will squeeze out SMEs.”

“The risk is councils will end up carrying the can for raising expectation for delivering community consultation.”

Responses from the Housing Sector

The National Housing Federation welcomed the ambition to make planning simpler and more efficient but raised concerns that some of the proposals could reduce the number of affordable homes that housing associations can deliver. They said that:

“We welcome the government’s overall ambition to improve the planning process, speed up housing delivery, and focus on good design and community engagement.”

“However, the proposed replacement of Section 106 – which currently delivers about half of all new affordable homes – has serious implications for the amount of affordable homes housing associations can build. Smaller and rural housing associations are particularly reliant on Section 106 contributions to deliver new affordable homes and would be disproportionately affected by the short-term changes to the current system too.

“The white paper acknowledges the importance of maintaining affordable housing delivery, and commits to the new levy delivering ‘at least as much, if not more on-site affordable housing as at present’.

“However, we need clarity on how this would in practice and how housing associations’ impressive record of affordable housing delivery will be safeguarded.

“In particular, it will be vital that funding from the levy is ringfenced for affordable housing, that housing associations can access it easily, and that affordable housing delivery is not lost in areas where the levy will generate less income.”

The Royal Institute of British Architects described the proposals as ‘shameful’ and said they would do:

“Almost nothing to guarantee the delivery of affordable, well-designed and sustainable homes... there’s every chance they could also lead to the development of the next generation of slum housing.”

Shelter said that social housing ‘could face extinction’ if the requirement for developers to build their fair share was removed. Polly Neate, their Chief Executive, called for a guarantee of affordable housing and said that:

“Section 106 agreements between developers and councils are tragically one of the only ways we get social homes built these days, due to a lack of direct government investment... So, it makes no sense to remove this route to genuinely affordable homes without a guaranteed alternative.”

The Town and Country Planning Association condemned the White Paper as disruptive and rushed, saying 90% of planning applications are currently approved but there are up to a million unbuilt permissions. Hugh Ellis, their Director of Policy said that:

“This kind of disruptive reform doesn’t suit anybody, neither landowners nor developers. They’re turning the system on its head at a time when it’s working very well for the volume house builders – 90% of planning applications are approved and there are about a million unbuilt permissions... It’s about local democracy. When local people are walking down the street and come across a new development they didn’t know about, the answer will now be: ‘You should have been involved in the consultation eight years ago when the code was agreed’. It’s diluting the democratic process. At the moment, people get two chances to be involved: once when the plan is made, and once when a planning application is submitted. Now they’ll only have a chance when the code is being prepared.”

Zack Simons, a planning barrister at Landmark chambers, said there was a lot to welcome in a move towards digitising the planning system but added that ‘literally nothing’ that the government says it wants to achieve could not already be achieved under the current planning system. He said that:

“Promises of ‘radical reform’ can grab headlines. But remember that of more than 400,000 planning applications which are determined every year, over 80% are granted permission and under 0.5% are appealed to the Planning Inspectorate.”

Helen Evans, Chief Executive of Network Homes, and Chair of the G15 group of London's largest housing associations said that:

"The country needs many more affordable homes and the planning system makes an important contribution towards that. I strongly welcome the intention of government's proposed reforms to increase transparency and certainty to help increase the delivery of affordable homes."

Responses from Political Parties

The Liberal Democrats have condemned the government's plans to reform the planning system, arguing that proposed changes will do nothing to alleviate the housing crisis. They believe that the proposals will not help those who are stuck on waiting lists and express concern that zoning plans risk leaving whole areas behind.

With councils across the country approving nine out of ten planning applications, it is obvious that reforming planning laws will not help people on waiting lists or struggling to afford a home. The Liberal Democrats want to see 100,000 new social homes built every year, and for local authorities to have the power to suspend the right to buy, so that they can finally start tackling the housing crisis in their areas.

Tim Farron MP, Liberal Democrat Spokesperson for Housing, Communities and Local Government Tim Farron said that:

"Government Ministers have done nothing to persuade anyone that their planning reforms will alleviate the UK's housing crisis. Their zoning plans risk worsening inequality and leaving whole areas behind. The Conservatives' plan is that new developments of up to fifty homes may no longer have to provide any affordable housing. This will further reduce the number of affordable homes being built. These proposals are an attack on local democracy and will deny people the chance to have their say on local development."

"The Liberal Democrats are calling for an urgent housebuilding programme of environmentally friendly social homes for rent. That is the only way to tackle the housing crisis head on."

Labour called it 'a developers' charter' that will 'set fire to important safeguards'.

Darren Rodwell (Labour), London Councils' executive member for housing & planning, told the 'Local Government Chronicle' that abolishing section 106 and weakening council planning powers was:

"Potentially disastrous for Londoners and could reduce the amount of affordable housing built in the capital... London is suffering the most severe homelessness crisis in the country and the chronic shortage of affordable housing is at the heart of this... It would be a massive step backwards if the government undermined boroughs' ability to ensure new development in London includes affordable homes."

Consultation Questions

The specific questions that the White Paper is consulting on are outlined in the Appendix.

Conclusions

The government has issued a White Paper called 'Planning for the Future' that proposes relaxing planning laws and opens the way for unrestricted housing development in urban and rural areas without making any provision for affordable housing for local people.

It is generally accepted that there is a shortage of housing across England and that affordable housing is in particularly short supply. The government argues that the shortage of housing has been caused by councils' reluctance to approve planning applications. However, with councils across the country approving nine out of ten planning applications and with councils having given approval for a million new homes that developers have yet to build, it is obvious that reforming planning laws in this way would not help people on waiting lists or struggling to afford a home. What is preventing affordable homes from being built it is the lack of funding for housing associations and a planning system that does not require developers to build enough affordable housing when they build a new scheme.

Under the government's proposals, most of England would probably be designated a 'growth zone'. Planning applications based on a government 'design code' would get automatic planning approval. New developments of up to fifty homes would no longer have to provide any affordable housing. In regeneration areas there would be an even greater relaxation of planning controls and strong planning controls would only be retained in the green belt. Section 106 agreements and the Community Infrastructure Levy that currently provide new affordable homes would be abolished and replaced with a new infrastructure levy that would be less effective. Local councils would be powerless to intervene in most cases. These proposals are seen by many as an attack on local democracy, will allow developers more opportunities to build what they want and will often deny people the chance to have their say on local development. They would be likely to result in increased numbers of second homes and hardly any affordable homes for local people.

The proposals contain very little detail on any alternative way to boost the number of affordable homes, promising only that they will not decrease.

The white paper proposes a consultation on developers making in-kind payments of affordable homes toward the levy or allowing local authorities to buy a proportion of affordable housing at a discounted rate.

The reaction of both the local government and housing sectors has been critical. The government is out to consultation. We have until 29th October 2020 to respond.

Adrian Waite
August 2020

Appendix – Consultation Questions

- What three words do you associate most with the planning system in England?
- 2(a). Do you get involved with planning decisions in your local area? [Yes / No] 2(b). If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]
- 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]
- 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]
- 5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

AWICS Ltd., Telephone: 017683-51498. Mobile: 07502-142658. Twitter: @AdrianWaite.
E-Mail: adrian.waite@awics.co.uk. Website: www.awics.co.uk

Managing Director: Adrian Waite MA CPFA CIHM FInstLM. Registered office: c/o Butterworths Solicitors, 3 Walker Terrace, Gateshead, Tyne & Wear, NE8 1EB. Company Number: 3713554. VAT Registration Number: 721 9669 13.

- 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.]
- 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.]
- 7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?
- 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.]
- 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.]
- 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.] 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.] 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.]
- 10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]
- 11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]
- 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.]
- 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?
- 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.]
- 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]
- 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]
- 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.]
- 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.]
- 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.]
- 20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

- 21. When new development happens in your area, what is your priority for what comes with it? [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other – please specify]
- 22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold? [Yes / No / Not sure. Please provide supporting statement.]
- 22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]
- 22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]
- 22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement.]
- 23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]
- 24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]
- 24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes / No / Not sure. Please provide supporting statement.]
- 24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]
- 24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]
- 25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]
- 25(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]
- 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?

The Planning White Paper The Implications for Affordable Housing - Webinar

We are holding a webinar entitled 'The Planning White Paper and its implications for Affordable Housing' on 30th September 2020.

The webinar will last about an hour and costs £30 plus value added tax (a total of £36).

AWICS Ltd., Telephone: 017683-51498. Mobile: 07502-142658. Twitter: @AdrianWaite.
E-Mail: adrian.waite@awics.co.uk. Website: www.awics.co.uk

Managing Director: Adrian Waite MA CPFA CIHM FInstLM. Registered office: c/o Butterworths Solicitors, 3 Walker Terrace, Gateshead, Tyne & Wear, NE8 1EB. Company Number: 3713554. VAT Registration Number: 721 9669 13.

The Planning for the future consultation proposes reforms of the planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed. The consultation concludes on 29th October 2020.

All those with an interest in Planning and Affordable Housing should attend including elected Members in local authorities; Planners; Housing managers; and Finance managers; and Board members in Housing Associations and Arms' Length Management Organisations.

The webinar will be of particular interest to those who wish to prepare responses to the government's consultations.

The presenter will be Adrian Waite, a former Finance Director at a local authority and Chair of a Housing Association, who is well known for his ability to explain complex strategic and financial matters clearly. [To view his biography, please click here.](#)

It is possible to ask questions during and after the webinar. The webinar is also accompanied by a very useful briefing paper that will be provided to participants alongside a copy of the presentation used. A recording of the webinar is available after it is completed. Participants will also be provided with Continuing Professional Development (CPD) certificates.

For further information or to make a booking, please click here: <https://awics.co.uk/the-planning-white-paper-and-its-implications-for-affordable-housing>

About 'AWICS'

'AWICS' is a management consultancy and training company. We specialise in providing support in finance and management to clients in local government and housing in England, Scotland and Wales. We are well known for our ability to analyse and explain complex financial and management issues clearly.

Our mission statement is 'Independence, Integrity, Value'. We therefore provide support to clients from an independent standpoint that is designed to help the client to achieve their objectives. We are passionate about working with the utmost integrity. We believe that we offer the best value for money that is available today!

For more information about our services and us please visit our website at www.awics.co.uk or contact Adrian Waite at Adrian.waite@awics.co.uk. Services that we offer include:

- Management Consultancy – <http://www.awics.co.uk/ManagementConsultancy.asp>
 - Interim Management – <http://www.awics.co.uk/interimmanagement.asp>
 - Regional Seminars - <https://awics.co.uk/seminars-2020>
 - In-House Training - <http://www.awics.co.uk/inHouseCourses.asp>
 - Webinars - <http://www.awics.co.uk/webinars.asp>
 - Independent Residents' Advice – <http://www.awics.co.uk/IndependentTenantAdvice.asp>
 - Technical Books - <http://www.awics.co.uk/publications.asp>
 - Information Service - <http://www.awics.co.uk/aboutUs.asp>
-