

Written evidence submitted by Newcastle City Council [FPS 159]

**Housing, Communities and Local Government Select Committee-
New inquiry: The Planning System**

I write in response to the above Housing, Communities and Local Government Select Committee Inquiry into the planning system following the government's consultation on the White Paper - Planning for the Future. The council welcomes the opportunity to feedback our response and encloses the attached report on the select committee matters for your consideration.

Newcastle City Council has ambitious plans for growth in our Local Plan with a target to deliver 21,000 new homes by 2030. We have a comprehensive and an up to date Local Plan which includes an adopted Core Strategy which was prepared jointly with Gateshead Council (adopted in March 2015 and reviewed in March 2020), and a Development and Allocations Plan (adopted in June 2020). We also have a CIL Charging Schedule (adopted in November 2016). Delivery of over 6,000 new homes on our allocated strategic development sites is progressing and we have significantly increased the pace of development in the City in the last 5 years. We have consistently passed the housing delivery test (in excess of 240%) and have demonstrated sufficient 5 year housing land supply since the adoption of the Core Strategy. We also work closely with our neighbouring authorities and will continue to do so under a devolution agreement in the North of Tyne Combined Authority area.

Newcastle has already embarked on an ambitious digitisation programme of services and has recently been named Smart City of the Year in 2020 and received the Barrier Removal Award at the Connected Britain awards celebrating digital technology. Additionally, Newcastle is a leading city on the 2020 Smart City Index and is 3rd in the UK after London and Manchester. In the field of urban design our services and expertise are widely recognised. Newcastle provides a comprehensive, highly successful advice service for surrounding Local Planning Authorities in the area. Given our commitment to improvement of services and specialist knowledge we would welcome the opportunity to be part of government pilots, testing proposed digital technologies and design codes.

We have considered the questions and issues in the call for evidence and would like to submit the responses in Appendix A attached to this letter. Also attached for your information is the Council's response to the Planning White Paper (Appendix B).

I have highlighted in these responses the main areas of concern for Newcastle. If you require any further information or discussion on the matters I have raised in this letter or our response I would be happy to provide more detail.

Yours faithfully



Councillor Ged Bell

Cabinet Member for Employment and Culture
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Appendix A Responses to the Planning System Call for Evidence

1. Is the current planning system working as it should do? What changes might need to be made? Are the Government's proposals the right approach?

The council considers that the current planning system is working well in Newcastle upon Tyne in that planned, sustainable growth is being delivered across the city providing much needed new homes, affordable housing and specialist accommodation, whilst protecting the green belt. Prior to the onset of the Covid 19 pandemic, the city met its proposed population target earlier than planned and employment land take up has contributed to delivering against the new jobs target.

It is recognised that there are some benefits in the Government's approach to changing the planning system, such as the digitisation of planning, placing an increased emphasis on the importance of design and placemaking and having a clearer, integrated system. It is recognised changes are needed to modernise planning, and councils will have a significant role in leading the way forward implementing change and efficiencies.

However, there are some fundamental concerns about the proposals in the Planning White Paper about the loss of local control and democracy; the substantial increase in resources that will be needed; the potential loss of fee and developer income and the impact a single Infrastructure Levy could have deterring future development growth. Many of the proposals including the imposition of mandatory housing targets and the categorisation of land in Local Plans would take away power that is so critical for cities, in their ability to use local knowledge, to identify local needs and respond to the need for rapid change. This is particularly the case now as we consider the economic recovery and local response to Covid 19.

The land allocation categorisation in local plans could restrict our ability to allocate and bring forward complex sites which are currently allocated in our Local Plan in which we have developed locally tailored policies supported by proportionate evidence. Under the Planning White Paper proposals, some of our Urban Core sites which are in Conservation Areas and have constraints may not fall into the growth category. Furthermore, the simplification of land categorisation would inhibit and stall development within cities where currently local plans allow for flexibility on urban mixed-use sites. Areas with development potential that remain unallocated can have a critical role to respond to rapid changes in trends of development (and economic changes), and provision for the diversity of uses that serve a wider city region in a sustainable, central location. If all sites suitable for residential development are required to be allocated for this use, unforeseen commercial, leisure, community or mixed uses could not be accommodated within the heart of the city region – as the most sustainable of locations.

2. In seeking to build 300,000 homes a year, is the greatest obstacle the planning system or the subsequent build-out of properties with permission?

Newcastle upon Tyne has a good track record of delivering new homes and meeting its local needs. There are sites for over 11,000 dwellings allocated within its local plan (for the period 2010-30), and the Council has granted planning permission for 8,000 dwellings on these sites. However, only 900 dwellings have been completed on allocated sites (as of March 2020). In addition, planning applications are consistently determined in a timely manner having comfortably met all the national performance targets in 2019-20 (NI 157) yet implementation rates of permissions can be slower than projected.

This would indicate the need to consider the nature and role of the private sector in implementing planning consents, as private sector housebuilders will only build at the pace that aligns to their company goals. For large scale housing schemes, the availability of funding up front to deliver infrastructure can constrain the timely delivery of sustainable neighbourhoods. However, in recent UK history the post-world war II period has been the only time when a significant pace of residential development has occurred, and this was achieved by delivering a public funded council home programme alongside private sector delivery. Such a programme would also have the benefits of increasing the stock of affordable dwellings.

3. How can the planning system ensure that buildings are beautiful and fit for purpose?

There is diversity amongst the quality of new development within Newcastle. This is influenced by stakeholders, funding and the teams involved. Newcastle benefits from an experienced planning committee that supports the delivery of some high-quality schemes, as has a number of innovative joint ventures. The high-quality schemes are from a broad range of developers and clients, as celebrated in our biannual Lord Mayor's Design Awards. Yet we also acknowledge there is a range of quality based on the viability aspirations of various stakeholders, constraints and the capacity to realise the original intent. Our recent monitoring of completed schemes highlights similar issues to the Housing Design Audit for England (Place Alliance, 2019) with some areas of compromise.

Newcastle would welcome national policy, guidance, measures and support which have potential to raise design quality throughout the city although we have some reservations about a nationally set concept/definition of 'beauty'.

The Government approach to increasing the use of permitted development (and permission in principle) without the need for planning permission is, however, undermining the opportunities to deliver good design. Prior approvals system allowing office to residential changes of use has already led to inadequate internal space and daylight in addition to the unsustainable location of residential conversions.

Newcastle City Council has, like many other Local Authorities declared a climate emergency. The government is urged to take forward changes to building regulations

to maximise environmental benefits and improved energy efficiency standards of buildings as a mechanism that can make rapid improvements to building design, alongside design aesthetics.

Newcastle cautiously welcomes proposals for design codes, given the experience in city on the Walker Design Code. Newcastle produced the Walker Riverside Design Code (2007) which gave clear guidance for a wide area of sites through character areas and street types. Buy-in from all stakeholders in the process was essential in it working well, and strongest in those directly involved in developing the code. Informal feedback from agents suggested that it helped push design quality in projects that had tight budgets when compared to equivalent provision in other parts of the city. In the current climate however, adherence to the code has reduced as the economy and viability has changed.

4. What approach should be used to determine the housing need and requirement of a local authority?

There are clear limitations to the use of simplistic housing formulas, as can be evidenced by the difficulties in applying the national Local Housing Need methodology since its introduction in 2018. The identification of needs and housing targets are complex and vary considerably across authorities, regions and should be assessed locally making use of local knowledge of the area. Such assessments can often require local considerations - such as in Newcastle the forecast of student population and international migration patterns. Newcastle (and the North East) are currently delivering considerably more new homes than the proposed national method would provide for. In the last 3 years Newcastle's track record has met its local plan target (now 1,080 dwellings per annum) and the housing delivery test (average 240% pass), which shows at a local level the council is successfully delivering its plan led ambitions for the city.

It is suggested that the national Local Housing Need formula be withdrawn, as since its introduction it has led to uncertainty of planning for new homes targets in local plans, and invariably leads to at best crude estimates of need, and at worst would require authorities to plan for homes that are not needed.

Furthermore, the government should set out proposals for regional and sub regional working as this is vital to ensure cross boundary cooperation. We need a clear understanding of the mechanism proposed to manage housing needs across regions.

5. What is the best approach to ensure public engagement in the planning system? What role should modern technology and data play in this?

Digitisation of maps and evidence will help improve transparency and speed, potentially reducing the number of queries as the end user will likely be able to find information themselves. However, a complete digitisation of local plans may well serve to exclude some groups who are unfamiliar or unable to use the technology.

Consideration of digitisation and computer read documents will need to be assessed from the perspective of different communities needs and ensuring that planning can still be accessible. For example, the proposed removal of the requirement to post on street site notices for more efficient ways of notifying neighbouring properties of a planning application are generally welcome, however, site notices are one of the most common ways communities are currently alerted to proposals and other methods would need to be clearly communicated. The proposals may disproportionately affect older and disabled people.

Digitisation of maps and evidence bases will help improve transparency and speed amongst those in the development sector, but for some the technology requirements will exclude them. A way to ensure everyone can contribute including hard to reach groups must be set out.

6. How can the planning system ensure adequate and reasonable protection for areas and buildings of environmental, historical, and architectural importance?

The current planning system affords the necessary protection of historical assets and there are fundamental concerns regarding the proposed wider scope of permitted development and permission in principle mechanisms for major development in the city. Whilst the re- use of brownfield land is a priority, brownfield land typically has more constraints and historical assets than greenfield sites. Development of listed buildings and brownfield land can be complex with off- and on-site infrastructure needs, underground contamination and abnormalities that could not be assessed and mitigated via a permission in principle.

7. What changes, if any, are needed to the green belt?

Newcastle upon Tyne is surrounded by a tightly drawn Green Belt and when combined with the River Tyne boundary, restricts the growth of the city. The protection has benefited the city in stopping unplanned urban sprawl and development in the open countryside. However, the national policy allows for development growth proposed in the wider city region to 'leapfrog' and gain consent more easily compared to sustainable urban extensions in the city characterised by better access to services and public transport access.

As a way of re-balancing these issues, national procedures for prioritisation of safeguarding land and green belt releases in the most sustainable locations should be considered where supported by the demonstration of evidence.

8. What progress has been made since the Committee's 2018 report on capturing land value and how might the proposals improve outcomes? What further steps might also be needed?

Despite good intentions of recent changes to the national planning policy and practice since 2018 there has been little change in developer behaviours and practices regarding land valuation and transaction in the city. The 'banking' of

residential planning permissions, continues to over inflate land values and prevent other less profitable uses being developed on sites and developers continue to seek reductions to planning obligations that would fund necessary affordable homes, education, transport and other infrastructure (rather than reduce land values).

The simplicity of the single infrastructure tariff proposed in the White Paper does not necessary lead to a fair and equitable system of charging, and there are real concerns that these proposals would undermine 'levelling up' objectives with lower value areas like the North East yet further behind the rest of the country.

Fundamentally, a tariff methodology based on *national* values would not recognise the vast divide between the northern and southern housing and commercial markets. This was a matter that the recent Government's Select Committee Inquiry into Land Value Capture (reported in 2018) identified as a concern in relation to the current system of developer contributions, however, not only does the proposals in the White Paper not appear to address the divide, it is more likely that the divide will increase.

If the infrastructure tariff proposal is still favoured over the current developer contribution mechanisms, than a national system of equalisation should be considered whereby higher tariff incomes generated in high value areas are in part retained and redistributed to lower value areas so that necessary infrastructure costs can be ('topped up') and equitably funding growth related infrastructure from developer contributions wherever, the development is located.

Appendix 2 Answers: White Paper: Planning for the Future Consultation Response

Question	Options	Free Text Response
1. What three words do you associate most with the planning system in England?		Locally-accountable, undervalued, fragmented
2. Do you get involved with planning decisions in your local area? 2(a). If no, why not?	Yes/ No Don't know how to/ It takes too long/ It's too complicated/ I don't care/ Other- please specify	N/A
3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and	Social media/ Online news/ Newspaper/ By post/ Other- please specify	Newcastle fully supports the move towards a digitised system which will encourage wider access allowing people to get involved and express their views. However, any changes need to make sure that the new system is accessible to all - both those who embrace digital technology and those who rely on current methods. The new system will need to set out clearly how it is expected that planning will engage hard to reach groups and avoid any diminution of accountability as a result of the move to greater digital emphasis.

<p>planning proposals in the future?</p>		
<p>4. What are your top three priorities for planning in your local area?</p>	<p>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</p>	<p>The top three priorities would be to ensure:</p> <ol style="list-style-type: none"> 1. Planning decisions are made locally to reflect local circumstances and are not unnecessarily constrained by nationally prescribed policies which do not reflect regional land use planning priorities e.g. mandatory housing numbers and viability testing. In some cases local policies are needed to address local issues and supported by local evidence. This will involve consideration of local authority and regional cross cutting issues for example, to develop the most appropriate local response. <p>A locally developed planning system is needed to address the impacts of covid ensuring planning can provide local policies which are flexible and resilient supporting growth providing jobs and creating attractive sustainable neighbourhoods with services which are connected to the city centre. Such policies will need to be specific and reduce inequality and social exclusion.</p> <p>Local Authorities have statutory responsibilities for delivery of a wide range of outcomes many of which have been devolved and are determined locally and planning powers should support this work.</p> <p>Each Local Authority will still need to have planning polices which need to be developed locally too so that these polices can be implemented, together with other local strategies, such as economic investment, housing and health and wellbeing strategies, in order to deliver locally appropriate responses. Local Authorities need to be able to develop locally specific standards where justified by evidence to address specific issues, such as open space standards to meet necessary provision and</p>

	<p>existing heritage buildings or areas/ Other-please specify</p>	<p>address deficiencies.</p> <ol style="list-style-type: none"> 2. Sufficient resources need to be made available for local planning authorities to allow the major changes envisaged in the planning system to be implemented. Resources need to be both financial and skills based to ensure local authority planning departments have the correct skills and experience to implement the proposed changes in the time frame envisaged, but importantly there needs to be specialist support and guidance through pilots and agencies. There needs to be a clear understanding about how the new consultation routes will work at plan making stage and in the Development Management process. Any changes must meaningfully inform plan making and avoid the need for Planning Inspectors to make significant changes at examination which would lead to increased legal challenge and a lack of local ownership of planning There is a need to ensure Local Authorities have the resources to undertake stakeholder engagement with landowners, housebuilders and local communities to allow understanding of for the process which will take time. At planning application stage stakeholders must continue to input their views into planning and be able to influence the detailed outcomes using their local knowledge. 3. Tackling the impacts of climate change and protecting and enhancing our natural and built environment for future generations through facilitating changes in the way people live, work and travel, must be a thread which runs through the new system. It will be important to set out a route to achieve passive/house net zero buildings and require new buildings to meet this new low building code. Clear expectations for all the different policy areas must be set out on how they must adapt to deliver net-zero carbon outputs and biodiversity net gains to meet national targets.
5. Do you agree	Yes/ No / Not	The strategic nature of local plans is critical to the implementation of a cohesive strategy of

<p>that Local Plans should be simplified in line with our proposals?</p>	<p>sure. Please provide supporting statement</p>	<p>improvement and better social, economic and environmental outcomes for the Local Authority area. In periods of recession, the ability of local areas to plan for rapid change is a fundamental tool and a locally designed response is needed. This is particularly the case at the current time and Local Authorities need to be able to develop local planning responses to the pandemic.</p> <p>The simplification proposed in the White Paper is not supported by details of the approach to allocation and background on implementation. In Newcastle we are concerned that the changes would not allow key sites to come forward in line with our current Core Strategy and Urban Plan which is leading to development of these sites and successfully delivering a range of housing and employment other uses across the city. It appears from the White Paper that key sites in our Urban Core area which are promoted for growth in our Core Strategy and Urban Core Plan could not be categorised as growth sites under the White Paper proposals as these are complex sites in Conservation Areas or including listed buildings. A large majority of our allocated sites in Newcastle have some form of constraints. However, we have worked to address challenges and to ensure that sites are deliverable to successfully demonstrate how sites are expected to come forward at public examinations into our Local Plan.</p> <p>The timescale set for plan making is very short and would effectively allow Local Planning Authorities about 20 months to prepare a plan prior to examination. Whilst it is accepted that some streamlining is necessary this would not allow time for meaningful stakeholder discussion and consultation and consideration of cross cutting issues. This is likely to lead to Inspectors amending plans to address points which should have been addressed by Local Authorities. Local Authorities would then need to consider their position and in some cases a decision would be made to start on plan making again to ensure plan making reflects local circumstances.</p> <p>Any changes to the planning system need to provide clarity on the role of planning in setting policy requirements. For example, in terms of sustainable construction it should be clear when construction standards can more appropriately delivered through other routes such as</p>
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		through Building Regulations. It should also be clear on how net biodiversity gain can be delivered. The delivery of net gains can be difficult to achieve on brownfield sites in urban locations. In addition clarity on the calculation of net biodiversity and the delivery mechanism is needed.
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	The principle that there is no need to replicate national policy in local plans is supported. However, there will still be a need for local plan policies that provide more local prescription, dependent on local circumstances. In addition, there could be evidence to support exceptions to national policy, that would provide certainty and clarity to articulate in a local plan policy. For example, Newcastle upon Tyne has specific policies relating to the impact of HMO in part of the city and the development of student housing.
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	Yes/ No/ Not sure . Please provide supporting statement	7 (a) Whilst we agree that there is scope to simplify and streamline the legal and policy tests in plan making, (the current tests are arduous to complete), any change would need to be meaningful and focused. The term sustainable development is a broad term which would need significant supporting statements to understand the breadth and range of matters that would need to be covered in such a consolidated test. It is difficult to comment further at this stage until we see what the “sustainable development test” to be issued by the Secretary of State will say and what will be taken forward in legislation.

<p>consideration of environmental impact?</p> <p>7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?</p>		<p>7 (b) Whilst the duty to co-operate procedures enjoyed varying degrees of success, it is of critical importance that if removed, regional or sub regional working is introduced to deliver a coordinated approach to land use planning, including to consider meeting objectively assessed needs, as well as plan for cross boundary infrastructure.</p> <p>Newcastle already works closely with North of Tyne Local Authorities, and with Gateshead with whom we have a joint Core Strategy and Urban Core Plan. Newcastle will continue close joint working with its partner authorities in the wider city region of Northumberland and North Tyneside, but also across the river with Gateshead Council and other authorities in our travel to work area..</p>
<p>8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?</p>	<p>No</p> <p>(Yes/ No/ Not sure. Please provide supporting statement)</p>	<p>Q 8 (a) There are clear limitations to simplistic housing formulas, as can evidenced by the difficulties since the introduction of the Local Housing Need methodology in 2018. The identification of needs and housing targets is complex and varies considerably across authorities, regions and in particular local considerations (such as in Newcastle the forecast of student population and internal migration patterns) and is best done at the Local Authority level but in close dialogue with adjoining authorities to ensure an appropriate approach across travel to work areas.</p> <p>To provide clarity and certainty of quantum in plan making there needs to be planning judgement at local level so as to avoid lurching from significant annual variation in figures.</p> <p>It is considered that a central government quantification of designated areas of constraint and brownfield land registered sites would be difficult to measure and therefore could not be relied upon. Similarly, it would be very difficult for a mathematical equation to assess available, suitable and deliverable sites. Thus, there would still need to be procedures in place for the local adjustment from the 'starting point' of a nationally derived methodology. There would still need to a process for assessing land supply, such as the 5 year housing land supply methodology.</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 (Yes/ No/ Not sure. Please provide supporting statement)</p>	<p>In Newcastle the population projections produced by ONS have varied significantly between data periods owing to the student population and international migration patterns. Intercensal projections have had to be corrected in the past owing to the difficulties in accurate projections. An over ambitious binding target (computer driven figure) could lead to 'under- delivery' against the housing delivery test (with planning implications) even if the city's needs are being met. Conversely, a low binding target (compared to locally assessed need) could stop much needed homes being built.</p> <p>Q. 8. (b), adjusting the local housing needs in the current system so that need can reflect the size of settlements as well as changes in affordability and demographic change will help determine quantity. However, there is a widening of the north south divide with the North East region and areas such as Newcastle City Council that consistently over deliver housing seeing reduced housing figures. In comparison areas in the south are seeing increasing housing numbers irrespective of constraint and poor delivery records. Seeking a greater contribution from housing markets under affordability pressures should not be at the expense of northern areas continuing to deliver. it is important that future trends are fully considered and local considerations such as economic drivers can be taken into account when determining the quantity. There are also improvements in quality that are drivers such as future housing needs to provide for residents and addressing matters such as social exclusion.</p>
<p>9(a). Do you agree that there should be automatic outline permission for areas for</p>	<p>Yes/ No/ Not sure. Please provide supporting statement</p>	<p>9(a). Newcastle's Local Plan includes a number of allocated strategic sites as part of ambitious growth in the city. Since adoption of the Core Strategy and Urban Core Plan in 2015 subsequent outline and detailed consents for development have taken a few years to secure and many of the sites are now under construction. The 'allocation' of sites with specific criteria set out in the policy has helped speed up the planning process compared to the alternative in the NPPF of identifying a 'broad location' for growth. Outline and detailed</p>

<p>substantial development (growth areas) with faster routes for detailed consent?</p> <p>9(b). Do you</p>	<p>Yes/ No/ Not</p>	<p>consents are fundamental mechanisms to considering up to date infrastructure needs and mitigation measures that are critical to sustainable development.</p> <p>The ability to identify the full infrastructure requirements and controlling mechanisms necessary to deliver high quality sustainable development at land designation stage is not realistic or achievable. It could also significantly delay the allocation of growth areas and prevent the phased delivery of development required both by the market and to allow time for phased infrastructure delivery.</p> <p>For strategic sites a single infrastructure levy would not be appropriate to deliver all the necessary infrastructure with the incumbent risk to the Local Authority. However, there could be scope for wider remit of reserved matters applications instead of a detailed application to allow for quicker permissions where developers wish to progress at pace. Greater use by developers submitting hybrid applications could help to provide them with flexible consenting options. The proposal for only one stage of consultation and the need to provide a greater level of detail required (as for an outline permission) in the same document would lead to significant abortive work for sites as sites are often consulted upon and then removed from the submission stage plan, the options proposed for detailed site masterplanning and design code details, could also exacerbate this.</p> <p>Of concern also , is the detailed level of assessments required to grant outline planning permissions and if they are to be granted automatically (or permission in principles procedures) where the onus of assessment, scrutiny, mitigations will be considered and secured to enable sustainable development. For example, the assessment of protected species and the decontamination of brownfield sites. The role and burden of expectations for the both the Local Planning Authorities and developers need to be clear in the new system.</p> <p>9(b). There is a danger of oversimplification, where this process impacts on the outcomes of the system it is designed to achieve. The complexities of towns and cities is that areas of</p>
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<p>agree with our proposals above for the consent arrangements for renewal and protected areas?</p>	<p>sure. Please provide supporting statement</p>	<p>protection/ renewal and growth are not mutually exclusive areas but in practice co-habit within the same localities. The alternative would be to introduce sub areas in these categories with corresponding policies, however, that is unlikely to meet the White Paper objective of simplicity. In Newcastle and archaeological assets of Hadrian's Wall cross the city as part of a world heritage site, yet the Council has a good track record of enabling suitable and appropriate development in relative proximity to heritage without adverse impact-</p> <p>Newcastle has current allocations for major sites with constraints which we would like to continue to allocate as priorities for growth. Comprehensive development of opportunity sites (that are not currently deliverable) could easily be undermined by piecemeal development within a 'renewal' area via the looser permission in principle consents.</p> <p>There are fundamental concerns regarding the proposed wider scope of permission in principle mechanisms for major development in the city where development of brownfield land can be complex with off and on site infrastructure needs, underground contamination and abnormals that could not be assessed and mitigated via a permission in principle. Development without reference to policy compliance would lead to missed opportunities, such as, the building of homes suitable for the ageing population or deliver development which is in line with our zero net carbon plan.</p> <p>However, of key concern is that the simplification of land categorisation which would inhibit and stall development within cities where local plans allow for flexibility of mixed uses. Such flexibility can enable responses to rapid changes in trends of development (and economic changes), and provision for the diversity of uses that serve a wider city region in a sustainable, central location.</p>
<p>9(c). Do you think there is a case for allowing new</p>	<p>Yes/ No/ Not</p>	<p>9 c In regions of significant housing market pressure and insufficient supply, the Nationally Significant Infrastructure Projects procedures could have a place in delivering speedier consents. However, this should be taken forward as a nationally funded programme for large scale new settlements of around 3,000 homes or more, and should not have implications for the resourcing of local plan examinations</p>

<p>settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?</p>	<p>sure. Please provide supporting statement</p>	
<p>10. 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>Greater certainty in principle is welcomed where it can deliver positive outcomes which is clearly prescribed in national policy and guidance. However, there must be an opportunity to take account of local circumstances included in the new system.</p> <p>The speed of decision making should not be increased at the expense of fully assessing matters such as design, sustainability, climate change and the wider impacts of proposals including cross boundary impacts, where necessary. Local democracy is important to ensure that interested stakeholders can participate in the design of development and that local accountability of decision making is still at the heart of the planning process.</p> <p>The development of local design codes for areas is supported to allow for guiding future developments. However, these require local support and will require time to develop. Whilst the intention is to speed up decision making sufficient time to develop design codes in advance of the Development Management process will be needed. The use of nationally prescribed pattern books for development needs to be carefully considered. Local character needs to be reflected in line with the National Design Guide.</p> <p>The speed of the determination of application is largely driven by the quality of information supplied by applicants and its compliance with local plan policy to deliver sustainable development. Delays are often due to the failure to supply the correct information and meet relevant policies. Speeding up the process would merely result in applications being refused permission due to inadequate information, rather than, as at present, where the applicant revises the application to meet local requirements. For example, reserved matters applications for housing that comply with design codes can be determined in 12 weeks.</p>

		Whereas non-design code compliant application typically can take many months and numerous revisions to be made policy compliant. This is still quicker than refusing applications and then dealing with re-submissions.
11. Do you agree with our proposals for accessible, web-based Local Plans?	Yes/ No/ Not sure. Please provide supporting statement	We support the use of digital technologies and developing plans in a more digital way. It is important that land use and policy information is easily accessible both for internal and external users. The digitisation of local plans through the use of maps may help to reduce the number of queries the local planning authority receives. A challenge for Local Authorities is to ensure that it has the resources and skills to develop and maintain interactive map in house otherwise it risks this area of policy planning being outsourced to an external software provider which is not often the most efficient solution. Digitisation of maps will help improve transparency and speed, potentially reducing the number of queries as the end user will likely be able to find information themselves. However, a complete digitisation of local plans may well serve to exclude some groups who are unfamiliar or unable to use the technology.
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	<p>Whilst we agree that there is scope to simplify and therefore potentially reduce the time it takes to produce a Local Plan we have concerns that the introduction of a statutory deadline, which includes sanctions for failure to deliver within the prescribed time, may limit a Local Authorities ability to thoroughly prepare and scrutinise a plan. The risk is that speed would take precedence over quality of plan making.</p> <p>Of concern also, is around the challenge that most Local Authorities face resulting from internal sign off and scrutiny processes, as this can impact upon the timeframe required to prepare and adopt a Local Plan. Additionally, in instances where a joint Local Plan is prepared as is this case with Newcastle City Council and Gateshead Council, a situation arises where two authorities' internal processes need to be considered.</p> <p>Moreover, the type and scale of evidence that would be expected to support a local plan can significantly affect the time taken to prepare a Local Plan, particularly in relation to ensuring Local Authorities have the resources in house or external consultancy support.</p>

		More clarity is therefore necessary to understand the extent of evidence required.
<p>13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?</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>Yes/ No/ Not sure. Please provide supporting statement</p>	<p>(a) Neighbourhood Plans are presently structured in a way that is very similar to Local Plans, with specific policies, they are also expected to be in general conformity with Local Plans. The White Paper proposes significant changes to what a Local Plan will look like including the move away from written policies and a move towards a digital map. This means that there is potentially the need, if Neighbourhood Plans are to be retained, to drastically redesign their structure so that they can be effectively integrated into the new style of Local Plan. This appears to be something that the government has considered, but no detail is provided at this stage.</p> <p>Given the emphasis in the White Paper on simplified land designations with outline consent granted in advance, it is questionable what Neighbourhood Plans will be able to do. It seems that the government's vision is for Neighbourhood Plans to become predominantly design based documents, with some degree of leeway to diverge from nationally prescribed design templates.</p> <p>A issue key issue if Neighbourhood Plans are to be retained is how their preparation process will be aligned with the new deadlines for completion of local plans.</p> <p>The White Paper proposes that the government want to look at opportunities which digital tools and data offer to support neighbourhood plans. The value of such tools in helping Neighbourhood Plans is clearly positive, although it is unclear how such tools will be provided and managed and the resources demands they will place on Local Authorities is unclear. It is vital that pilot projects are rolled out to make the most of the potential of further digitisation.</p> <p>The key element of any digital support for Neighbourhood Planning will be ensuring that relevant and up to date information on wider planning in the Local Authority Area is available so that Neighbourhood Planning can be integrated into the Local Plan preparation</p>

		process, especially given the proposed streamlining to speed up plan making.
<p>14. Do you agree there should be a stronger emphasis on the build out of developments?</p> <p>And if so, what further measures would you support?</p>	<p>Yes/ No/ Not sure. Please provide supporting statement</p>	<p>Private sector housebuilders will only build at the pace that aligns to their company goals. Small businesses need incentivisation which is primarily out of scope of planning. Diversification of builders, products, opportunities for self build groups and variety of tenure can go some way to facilitate build out in multiple outlets at the same time. There would need to be mechanisms in place to require housebuilders to diversify (that are not part of the current planning system) or incentives such as access for customers to ‘help to buy’ schemes.</p> <p>However, in UK history the post war period has been the only time when a significant pace of residential development has occurred and this was achieved by delivering a public funded council home programme alongside private sector delivery. Such a programme would have the benefits of increasing the stock of affordable dwellings.</p>
<p>15. What do you think about the design of new development that has happened recently in your area?</p>	<p>Not sure or indifferent/ Beautiful or well-designed/ Ugly or poorly-designed / There hasn't been any/ Other- please specify</p>	<p>There is diversity amongst the quality of new development within Newcastle. This is influenced by stakeholders, funding and the teams involved. Newcastle benefits from an experienced planning committee that supports the delivery of some high-quality schemes, as has a number of innovative joint ventures. The high-quality schemes are from a broad range of developers and clients, as celebrated in our biannual Lord Mayor’s Design Awards. Yet we also acknowledge there is a range of quality based on the viability aspirations of various stakeholders, constraints and the capacity to realise the original intent. Our recent monitoring of completed schemes highlights similar issues to the Housing Design Audit for England (Place Alliance, 2019) with some areas of compromise. Newcastle would welcome national policy, guidance and measures and support which have potential to raise design quality throughout the city although we have some reservations about a nationally set concept/definition of ‘beauty’.</p>
<p>16. Sustainability is at the heart of our proposals.</p>	<p>Less reliance on cars/ More green and</p>	<p>Sustainability defines a balance of social, economic and environmental considerations rather than delivering against a single priority. For example, all residential development should be planned to reduce reliance on cars as well as contribute to new open spaces and</p>

<p>What is your priority for sustainability in your area?</p>	<p>open spaces/ Energy efficiency of new buildings/ More trees/ Other- please specify</p>	<p>be energy efficient. Proposals for national net biodiversity gain are welcomed and will promote more sustainable development.</p> <p>Newcastle has declared a climate emergency and is seeking to be net-carbon neutral by 2030. This is the link to the plan: https://democracy.newcastle.gov.uk/documents/b36003/Supplemental%20Agenda%2014th-Sep-2020%2017.30%20Cabinet.pdf?T=9</p> <p>Part 3, Section 1 (Energy) and specifically the sections on Lifting Future Standards, Reduced Domestic Energy Consumption (Retrofitting and New Build Homes), and Reduced Non-Domestic Energy Consumption. Part 3, Section 3 (Adaptation and Sustainability) and specifically the sections on Delivering Sustainability through the Planning Process, Green Spaces, and Nature-based Carbon Sequestration Solutions.</p> <p>We are seeking through planning to secure sustainable patterns of development and travel, and an early delivery of the Green Homes Standard, via Building Regulations and MEES minimum energy efficiency standards in commercial buildings. By raising standards in building, promote sustainable patterns of development, energy efficiency and developing local energy networks together with specific local initiatives and projects we will work to be net carbon neutral across the city.</p> <p>In the case of grants of automatic outline planning permission there will need to be environmental assessment including assessment of site biodiversity. It will need to clearly set out how the significant effects on the environment and people will be assessed, mitigated and enhanced and at what stage of the process this would happen. Clarity is needed on the new system for Environmental Impact Assessment, Habitats Regulations and Water Framework Directive including how assessment will be required and how schemes will be implemented in practice.</p>
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<p>17. 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>Yes. Whilst it is positive to see the use of design guides and codes to increase the focus on design quality within the built environment, it is crucial that Part 3 of the National Design Guide covering National Model Design Codes is published as soon as possible to give certainty as to the form and content of design codes. The content of design codes needs to be in a form that can be used in various contexts.</p> <p>It is important to consider the following issues:</p> <p>17(a) Resource and Timescale</p> <p>In terms of the production of the codes, it is important to engage local communities when preparing design guides and codes to ensure local views and characters are considered. This process could be costly both in time and resources, particularly if these codes need to be sound and examined through a Local Plan process and to ensure they can be binding on decisions for future development. There might also be conflicting agendas to be resolved between different stakeholders and it will be important ensure design codes provide flexibility, which could ultimately prolong the process. It is also imperative to consider the level of input and support required from design officers within the Council for the preparation of codes within a set timeframe supported by adequate resources and capacity.</p> <p>17(b) Delivering and Implementing a Design Code</p> <p>Despite national planning policies and guidance, sometimes the design quality diminishes in the delivery stage notwithstanding a sound design guide or code, it is a challenging process to achieve positive outcomes to ensure the design quality as envisaged in the codes.</p> <p>This can sometimes result in the design quality of applications being affected as developers will continue to use alternative/ lower design standards on any future applications due to the precedents set out from the previous approvals.</p>
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<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/ No/ Not sure. Please provide supporting statement</p>	<p>A new body that enables expert training, shares best practice, provides guidance, monitoring and acts as a critical friend would be welcome, as raising the profile of design and placing it in people's aspirations helps places evolve for the better. Place making benefits from strong leadership following a firm vision that is well resourced. Whilst Newcastle benefits from in house expertise we are aware many Local Authorities do not yet have this essential role in house. Improving the resourcing of planning departments more broadly will be essential to meet the shift to earlier engagement and more detailed visual information suggested by the White Paper. On previously developed land it can be hidden constraints that prevent the vision of design codes and outline designs being realised, and up-front site investigations can help inform this. A chief officer for design and place-making would need to be supported with officers, skills and funding in order to deliver the vision of the White Paper.</p>
<p>19. Do you agree</p>	<p>Yes/ No/ Not</p>	<p>Yes. As the Government's housing accelerator, Homes England should champion good</p>

<p>with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?</p>	<p>sure. Please provide supporting statement</p>	<p>design and quality schemes across the nation, as opposed to focusing on housing numbers and potential returns. Greater emphasis on better quality and well-designed communities from Homes England will increase the design standard and expectations in the sector which might encourage other players in the market to follow.</p> <p>There are also benefits of increased engagement by Homes England with local communities and the Council at an early stage of the process (i.e. to develop design guide/ design code) to deliver better and exemplar places for people to live, work and play. This should be alongside the objective of the positive contribution of Homes England in supporting sustainable communities and meeting local housing and infrastructure needs</p>
<p>20. 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>We recognise that the proposals for implementing a fast-track for beauty could speed up the process of well-designed schemes which comply with design principles to make it through the planning system, and this is positive. However, as highlighted in other answers the success of a fast-track system is dependent on the quality of the design codes produced for development sites. The Building Better Building Beautiful Commission sets out that a fast-track to beauty can happen if the constraints of a site are highlighted early in the process and the principles of development have been set. The Council would reinforce the importance of ensuring the development principles and site constraints are robust enough to guide the development and this will require time and resources early in the process.</p> <p>The Council supports the proposals to incentivise high quality developments, however, we also have concerns about the level of compliance with design codes. More clarity is required on what measures will be in place to ensure compliance with design codes through delivery of Part 3 of the National Design Guide.</p> <p>The White Paper suggests a revival of ‘pattern books’ to articulate building types and rules, “allowing the pre-approval of popular and replicable designs through permitted development”. We have concerns that this could result in standard house types being replicated across the city, undermining the importance of local character in designs. We encourage designs which are local and distinct, and it would be disappointing to see</p>

		<p>developers opt for standard ‘safe’ house types which they know have been approved on developments.</p> <p>We also have concerns that the planning process can be as much about what is not shown as what is shown. The use of a fast-track system could increase the risk of elements being missed. One example here is a development that makes assumptions that a site is flat, then comes to discover the changes in level have a profound effect on the appearance of the development when they carry out further assessment work.</p>
21. When new development happens in your area, what is your priority for what comes with it?	<p>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</p>	<p>It is fundamental to ensure that transport infrastructure is delivered as soon as a development is occupied to ensure sustainable modes of transport are adopted by occupants from the outset. Each occupant should enjoy access to local amenities within walking –distance. To achieve this funding is needed to support necessary infrastructure. This will result in development that is sustainable, minimising its impact on the environment and provide supporting local facilities. Changes should ensure that additional burdens are not placed on the Local Authority for delivery and maintenance.</p>
22(a). Should the Government replace the	<p>No (Yes/ No/ Not sure. Please</p>	<p>22 a The simplicity of the single tariff does not necessary lead to a fair and equitable system of charging, and there are real concerns that these proposals could set lower value areas like the North East yet further behind the rest of the country. Fundamentally, a</p>

<p>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>provide supporting statement)</p>	<p>methodology based on <i>national</i> values would not recognise the vast divide between the northern and southern housing and commercial markets. This was a matter that the recent Government's Select Committee Inquiry into Land Value Capture (reported in 2018) identified as a concern in relation to the current system of developer contributions, however, the proposals in the White Paper do not appear to address the divide.</p> <p>A nationally derived threshold over which the levy is charged based on national average values (or residual value) set at a cautious level to withstand economic fluctuations could only be expected to have detrimental impact to northern towns, villages and cities owing to lower values, with the potential for reduced or zero income from developer contributions. However, if the threshold is set too high then development will simply stall. The complexities of build schemes means locations within a high value area does not guarantee it is viable (and likewise in a low value area that it is unviable). A national methodology based on average build/ land costs and average sales values (leading to a 'residual value') will need adjusting owing to regional variations and critically also to local circumstances such as increased costs of historic conservation, use of cranes, brownfield sites with contamination (or significant abnormals)- otherwise acceptable development may be thwarted and/ or communities miss out on necessary infrastructure.</p> <p>Fundamentally, CIL is a tool (with a complex set of regulations) to fund primarily off-site infrastructure. Whilst a single levy could be suitable for a limited scope of smaller developments, the experience in Newcastle of delivering infrastructure to support strategic sites is more complex. For strategic sites the current CIL system can operate alongside the planning obligations mechanisms, because a s106 agreement is more flexible in nature and can set appropriate triggers and the timely delivery of infrastructure. However, in removing planning obligations, a single infrastructure levy would undoubtedly lead to delay in funding decisions, a lack of control (and risk taking) by the developer, and a delay in build out. The uncertainties of funding strategic infrastructure could also affect the willingness of communities to accept ambitious growth.</p> <p>There is a lack of detail regarding the operation of a single levy in this paper and thus there needs to be a subsequent consultation on the details of any new system proposed to be</p>
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<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 (Nationally at a single rate/ Nationally at an area specific rate/ Locally)</p>	<p>carried forward to allow proper scrutiny and assessment of impact across a range of factors including geography and sales value areas.</p> <p>22(b) It is of critical importance that any rates (and threshold trigger values) are set locally to ensure the correct balance between the need for funding of necessary infrastructure and deriving rates that can be met by typical (or notional) development schemes in the area. The simplicity of the single tariff does not necessary lead to a fair and equitable system of charging and income for infrastructure needs. Applying a fixed levy based on average sales values will lead some development to hugely overpay (in more profitable south) and others would significantly under pay (lower value areas such as the North East). Higher rates of the levy would increase the risks of suitable developments not coming forward or lower rates could lead to Local Authorities missing out key policy and infrastructure contributions.</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 communities?</p> <p>22(d). Should we</p>	<p>Same amount overall/ More value/ Less value/ Not sure. Please provide supporting statement</p>	<p>22.c Changes to the developer contribution mechanisms should ensure on average a local parity of total developer income for those authorities that are currently CIL charging authorities, taking into account section 106 income. This is because the CIL charging schedules have been adopted with detailed evidence of the balance of charges and assessed by an independent CIL examiner to ensure the rates for chargeable development are deliverable. Any 'neighbourhood' portion to be provided for local infrastructure should be re-considered and ensure it is at least no higher in overall proportion to the total income levels. Parishes and forums located in strategic growth areas should receive a proportionate level of local funding to ensure that necessary main pot funding is available to provide local schools, highways and other essential infrastructure.</p> <p>Whilst in principle local flexibilities are generally welcomed, the lack of detail and mitigation methods relating to financial risks in the White paper does not afford the reader the necessary detail to respond. Developers are the risk takers, but the levy proposal here makes the Councils the risk takers.</p>

<p>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>22 (d) As a result of 10 years of austerity, councils' reserves have been diminishing and the financial impact of Covid on councils (which the government is not fully-funding) has made the financial situation worse – councils do not have 'pots of money' that they can dip into to fund infrastructure, that would be paid back later. The concern would be that there was an over reliance on this option instead of grant funding if councils borrow against future levy receipts in order to deliver infrastructure, it could reduce what is available to spend from the levy as interest charges will be incurred. This could be made worse for development projects with a long-time scale when inflation on costs will diminish funding by the levy value agreed at the permission stage.</p> <p>Current mechanisms would not allow for borrowing of this type. All the borrowing costs are charged annually to the revenue account – there would be no way of 'repaying' this when the levy eventually came in. This then means that councils would be overspending their revenue budgets. Once revenue budgets are 'closed' for the year, they cannot be changed later (ie levy funding couldn't be paid back in). There is also the issue that if the levy is capital funding, it couldn't go into the revenue budget (to pay back the borrowing costs), even if it was received later in the same financial year as councils' are not allowed to use capital funding for revenue expenditure.</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 (Yes/ No/ Not sure. Please provide supporting statement)</p>	<p>Changes of use can have differing infrastructure requirements and implications and as there is a greater use of permitted development it is essential that Local Authorities continue to have the ability to plan and deliver necessary infrastructure improvements. This approach should also be taken for permission in principle type consents, if they are taken forward.</p>
<p>24(a). Do you</p>	<p>Yes</p>	<p>24.a For the majority of local authorities, the affordable housing targets in local plans are</p>

<p>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>lower than the assessments of local need for a variety of reasons. In Newcastle, deliverability of development overall is affected by lower residential values than the national average with consequential impacts on affordable housing delivery by the private sector. However, a council led delivery programme of affordable housing has enabled a significant increase in new affordable homes since 2015 meeting our Local Plan targets.</p> <p>For a local plan required affordable housing policy, on site requirements help to ensure sufficient land is available to deliver the affordable homes, as well as the potential for inclusive and sustainable communities. There will need to continue to be exceptions to on site delivery , for example where: proactive councils can assist by delivering mutually agreeable affordable homes and economies of scale; or where the quantum or type of units in a private led scheme cannot easily be managed as affordable units on site .</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/ No/ Not sure. Please provide supporting statement</p>	<p>24. b In order to assist Local Authority creativity to help meet local housing needs, both options should be available. Local Authorities should be rewarded in taking forward these approaches locally in recognition of the increased financial risks.</p> <p>In areas of lower viability, the risks are greater to councils due to the risks of reduced developer contributions to fund all the necessary infrastructure types to support growth and the scheme risks around uncertainty of sales values at the point of delivery and the impact on quantum of units that can be delivered as affordable.</p>
<p>24(c). If an in-kind delivery approach is taken, should we mitigate against local authority</p>	<p>Yes/ No/ Not sure. Please provide supporting statement</p>	<p>24.c Local authorities should be rewarded in taking forward these approaches locally in recognition of the increased financial risks. In areas of lower viability, the risks are greater to councils due to the risks of reduced developer contributions to fund all the necessary infrastructure types to support growth and the scheme risks around uncertainty of sales values at the point of delivery. Developers should not be in a position to seek a refund against a single levy payment.</p>

<p>overpayment risk?</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/ No/ Not sure. Please provide supporting statement</p>	<p>24.d There is local evidence to indicate that volume housebuilders have been selling affordable housing units to registered providers which are below national housing standards. This can have the effects on use for example for an affordable home designed with 3 bedrooms only being used as 2 bedroomed properties due to the small size of the third bedroom. All affordable homes should be built to the national homes standards, which should also incentivise housebuilders to build open market homes to meet homes standards as well.</p>
<p>25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?</p> <p>25(a). If yes,</p>	<p>Yes</p> <p>(Yes/ No/ Not sure. Please provide supporting statement)</p>	<p>25.The prioritisation of spend between affordable housing and other infrastructure types should be equal to allow for flexibility of provision to meet local needs. Of key concern is that any developer contributions should be primarily spent to support the necessary infrastructure to support the development growth, thus any relaxation of restrictions should not have the effect of raising wider expectations of available funding for projects. With council budget constraints and limited developer income, wider use of levy could undermine planned sustainable development. The responsibility of funding and delivering infrastructure in the White Paper proposals is firmly placed at the Local Authority, where local accountability is greatest, rather than the current system, where the developer (as the risk taker) can deliver on or off site infrastructure via planning obligations. For councils, the responsibility for funding significant infrastructure, such as necessary for supporting strategic sites, becomes a significant financial risk to the Local Authority. This is an even bigger risk for cities planning for ambitious growth and cities in generally lower value areas but could apply to councils across the country. Thus, any single levy proposals should allow councils to require ‘in kind’ and direct delivery of all infrastructure types.</p> <p>25. (a) The current planning obligations provide certainty of delivery as the negotiated</p>

<p>should an affordable housing 'ring-fence' be developed?</p>	<p>Yes (Yes/ No/ Not sure. Please provide supporting statement)</p>	<p>measures in effect 'ring fence' delivery of all infrastructure and mitigations, thus aiding transparency. This approach should be retained in any new developer contribution mechanism to ensure delivery of affordable housing as well as other types of necessary infrastructure.</p>
<p>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>		<p>There are a number of welcome opportunities presented in the White Paper consultation that will help to make the planning system more efficient including the proposal to digitise the planning system. However, consideration of digitisation and computer read documents will need to be assessed from the perspective of different communities needs and ensuring that planning can still be accessible. For example, the proposed removal of the requirement to post on street site notices for more efficient ways of notifying neighbouring properties of a planning application are generally welcome, however, site notices are one of the most common ways communities are currently alerted to proposals and other methods would need to be clearly communicated. The proposals may disproportionately affect older and disabled people.</p> <p>Digitisation of maps will help improve transparency and speed amongst those in the development sector, but for some the technology requirements will exclude them. A way to ensure everyone can contribute including hard to reach groups must be set out.</p>

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