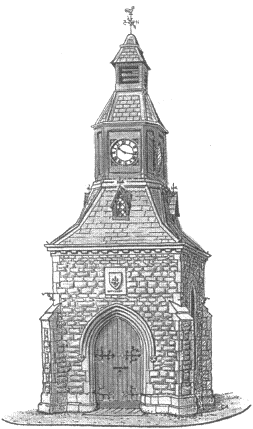
Mere Town Council

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**Planning for the Future – White Paper - Consultation document published 6th August 2020**

**General response**

Mere is situated in the extreme south-west corner of the county of Wiltshire; part of our parish boundary also forms the Dorset county boundary. Nestling beneath the South Wiltshire Downs, large parts of the surroundings are designated as an Area of Outstanding Natural Beauty. There are also a number of sites in and around Mere that provide a wealth of historical and archaeological interest. In a rural area such as this, the car is needed to access anything, infrastructure is limited or poor, including roads that are in a very poor state, poor paths, limited public transport, and digital connectivity is often patchy in many places.

Trust in the planning system is low. This is partly because it is complicated and protracted but also because it is ambiguous and decisions are often made on one person’s interpretation and these interpretations can vary from person to person, authority to authority. Decisions are also often overturned at public inquiry level or at appeal. We understand that the aim behind this new planning regime is to move from discretionary planning decisions to a rules-based system. This will need to be clear, concise, accountable and above-all, instil trust. Another reason that has caused a loss of public confidence and lack of trust in the planning regime is the pitiful resources available for enforcement. We have a large number of planning breaches in our town at the present time with people living in barns in the open countryside, people living in caravans in the open countryside, people building dwellings in their back gardens and people converting properties with extra bedrooms without planning permission. Lour LPA do their best but their enforcement resources have shrunk to such a level that their officers are too overstretched and the process is no longer effective.

Many residents are not aware of Local Plans and they usually only become engaged in the planning process

when they want to submit or object to a planning application. They are therefore usually engaging too late in the process to make a difference because planning applications are approved, or not, on the basis of the planning policies set out in the Local Plan. So, for instance, if a group of local residents’ object to a building during the planning application process, the objection will only normally hold weight if it points to the policies that are not being met. Therefore, it is vitally important to get communities aware of and involved in the process of creating Local Plans, whether this is by way of Neighbourhood Planning or will be enhanced by digital engagement is difficult to predict. However, it is clear that engagement with communities needs to be meaningful and they need to have a say in how planning polices are shaped.

If we are to involve local people in the way they want to see their areas shaped then we feel that Neighbourhood Plans need to be enhanced so that they deliver real additional power to communities. Neighbourhood Plans have been a resource that Town & Parish Councils (being the tier of local government that is closest to the community) have embraced. However, the process requires a huge amount of volunteer time and this is daunting, often putting people off at the very start. It would be helpful if greater clarity could be given to communities in the guidance about what Neighbourhood Plans can and can’t influence. The process of updating Neighbourhood Plans should be simplified or they should be extended to run over a longer time span, in line with the local plan. The current situation where neighbourhood plans are being made increasingly less valid over time and requiring frequent updating with all the effort that entails is not functional. Neighbourhood plans need to be linked more directly into the duration of the local plan.

This Planning White Paper is placing too much emphasis on the delivery of housing and should be taking the opportunity for a two-pronged approach to deliver housing and employment opportunities in equal measures. We need to bring manufacturing back to Britain: the COVID-19 crisis has proved that this country is on its knees when we cannot import goods. The PPE shortage was a classic example of this and the way that manufacturers in the UK responded, by switching their manufacturing processes to meet the PPE demand was amazing. Other goods that were in high demand whilst the country was in lockdown could not be bought because stocks had depleted and new orders could not get through. We are likely to be faced with an economic crisis the likes of which have never been seen before with record unemployment levels. Regenerating house building is not going to change this unless we can provide the jobs for the people that are going to live in the houses that are being developed. The approach to zoning or categorising, with three types of land, is attracting a lot of attention. The detail will be critical here, as there is a clear risk that housing will again crowd out employment with landowners seeking the greatest return and the concern is that the current picture of employment as an afterthought will continue.

The CPRE is urging the Government to introduce a genuine ‘brownfield first’ policy and ensure this land is prioritised for redevelopment over green spaces and countryside. It argues that there is enough capacity on brownfield land to meet the government’s target of building 300,000 homes per year. As a Town Council we would much prefer to see redundant brownfield sites developed before any new greenfield sites are taken up for development. However, we need to be certain that these brownfield sites are ‘redundant’ and cannot be re-developed for employment purposes where this is sustainable. There is absolutely no point in building homes on a brownfield site and then using a Greenfield site to build a new factory. Having said that, where the brownfield site is no longer sustainable, there could be merit in relocating the employment use to a greenfield site and redeveloping the brownfield site for housing, as long as the employment stays in the area. We successfully achieved this in Mere where a town centre factory that had no future in its current location (due to the fact that it could not expand and large lorries were having to drive through the town centre to reach it) relocated to a greenfield site just outside the town using the funds released through the sale of its then existing site for housing. The new factory is logistically better located and the town has kept its source of employment.

There needs to be some mention of water resources – the demands that 300,000 new houses per year would place on our water resources are enormous. Here, in our little town of Mere, we have first-hand experience of the demands that extra development places on our rivers and waterways, wildlife and environment. The Environment Agency issued an abstraction licence to Wessex Water in 1975 to take up to 9 million litres of water a day from our water source. This water is used to supply surrounding towns and villages in the local catchment area but it can sometimes be piped 25 miles away out to the north or to the west when demand is high. If development is to take place at the level expected by the government then water demand will rise unsustainably. We will be left with dry watercourses like we sometimes witness here in Mere.

**Questions**

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

Protracted

Ambiguous

Complicated

2. Do you get involved with planning decisions in your local area?

Yes, we are a Town Council and therefore we act as consultees on all planning applications that affect our town. We also get involved, as far as possible, in Local Plan development and strategic plan developments. We have started the Neighbourhood Planning process although this has stalled at the present time due to amount of volunteer work that is anticipated in order to see this through to fruition and the lack of confidence that it will achieve its intended results.

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]

There needs to be an improvement in the way planning can be accessed. If implemented correctly, the digitisation of the planning process will deal with key issues in the industry: lack of trust, transparency, over-complexity and under-engagement, while speeding up the process – getting our much-needed housing built and revitalising our high streets and town centres. The consultation document says: *Residents will no longer have to rely on planning notices attached to lamp posts, printed in newspapers and posted in libraries to find out about newly proposed developments. Instead people will be able to use their smartphone to give their views on Local Plans and design codes as they are developed, and to see clearer, more visual information about development proposals near them – rather than current planning policies and development proposals presented in PDF documents, hundreds of pages long*. We are concerned that the notices attached to lamp posts and printed in newspapers or posted in libraries will be replaced with a digital system. Residents who are not digitally literate should not be disadvantaged. We live in a rural area that has a much higher than average elderly population; an AGE UK report of 2018 states that over 79% of all digital exclusion is among those aged 65 and over.[[1]](#footnote-1) Therefore, it will still be necessary to attach planning notices to lamp posts, print them in newspapers and post them in libraries. We are concerned that by placing an emphasis on making the system more accessible through technology, it will reduce democratic accountability. We are also concerned that it will take powers away from local authorities so that more policy and decisions are made centrally.

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 / / 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]

**More or better local infrastructure** – we have accepted a fair proportion of development in our small town over recent years. This has, however, resulted in an infrastructure problem that is not being addressed by S.106 agreements, CIL contributions or any other form of planning gain. The issues we are talking about are the pressures on our local GP surgery who is at capacity and cannot extend either in terms of building or human resources. The pressures on town centre car parks. The increased use of cars on rural roads because residents now have to travel to get to services that are being lost locally i.e. banks, building societies, (there is very little public transport in this area); pressures on local schools who will need to expand in order to accommodate more pupils, pressures on health & emergency services. This Town Council has had a number of large buildings recently converted into flats (our local bank and a large hotel) – we have not seen a penny of CIL for these developments because they are conversions and so we cannot make any infrastructure benefits to compensate for the added pressure of increased population. We have also seen a number of new build individual houses but the developers have said that they are self-build (we know they are local developers and have no intention of living in the house) and so, once again, they have found the loophole to get out of paying CIL and we get no infrastructure benefit.

**Increasing the affordability of housing** – it seems that developers are finding ways to get out of meeting the targets for affordable housing set by the planning authorities by stating that they are financially unviable. These viability assessments then have to be scrutinised at the expense of the local authority. There should be no get out clauses. If a target is going to be set then it needs to be met

**The design of new homes & places** - We need to build new houses, so good design is vital for ensuring that new developments are acceptable to the local community, as well as helping us to move towards a zero-carbon economy. It may be necessary to remove permitted development rights to ensure that good design standards are sustained.

5. Do you agree that Local Plans should be simplified in line with our proposals?

[Yes / No / Not sure. Please provide supporting statement.]

No. We feel that the creation of three relatively arbitrary zones is far too simplistic for the complexities of planning in a large rural area. The zonal system seems much more suited for large urban areas and may well work there but we feel extremely strongly that they are not appropriate for rural areas. Planning in villages in particular can be complex and it is not uncommon for developments to be approved through planning committees that do not meet local plan rules but are strongly supported by the community and fill a specific need. Simple blanket rules will always end up creating circumstances where there needs to be exceptions and the more simplistic the rules or zones, the more problems there will be with exceptions. It is possible that a local version of a zonal system could be delivered but it would need to be less restrictive than the proposals in the white paper and would probably need to have more than 3 zones and would need to be developed on a local basis. At the moment the definition of strategic housing sites provides a version of a zone system. However, developers are not keen to actually develop those identified sites, particularly where they are less financially attractive than other green field sites. As a result, by delaying those sites they are able to manipulate the 5-year land supply and to bring other sites forward. A zonal system will not prevent this from happening and the same stress will exist in the proposed new system. If the aim is to increase housing delivery in an area like Wiltshire what we need is an ability to force developers to develop allocated strategic sites. A mechanism to allow a local development company to take complete control of the development of sites after a certain point if development is not continuing with a mechanism for the land owner to still get value for the site would provide an excellent incentive to get developers to proceed with allocated sites and not to sit on them. We think that the idea of using an interactive web-based approach to enable residents to clearly understand planning in different areas is a good one.

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

Broadly yes. We think that the idea of having simplified national policies around development management is good. However, these should be a set of minimum standards which may need more specific local context.

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.]

Yes. This is a good idea and we support it.

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

The duty to co-operate as it stands can be used by a council which is not keen on development because of local political issues to push that development onto neighbouring authorities. This should not be allowed to occur and on that basis the removal of a formal duty to co-operate is very welcome. There are however some issues, particularly around infrastructure and environmental issues where authorities should still be forced to co-operate to prevent the actions of one authority causing significant harm to another. There is also concern as to how strategic employment matters will be resolved with the removal of the duty to cooperate. Local government reform was clearly a potential tool to address this, but all indicators are that this has been kicked down the road for the time being. Being able to address employment issues across functional economic market areas is essential. Without a strategic framework it is difficult to envisage how sustainable patterns of development will be arrived at, and how local areas will be expected to align Infrastructure Funding Statements and Infrastructure Levy contributions with strategic infrastructure investment. These issues will need to be addressed in the forthcoming National Infrastructure Strategy and Devolution White Paper.

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.]

No. We accept the need to assign housing targets to each development area however there are always going to be specific local requirements that make a simplistic mathematical model difficult to work. Planning Authorities need a consistent housing target for a specific period of time that is not constantly being updated. It would be helpful for the LPA to have a target number and then for them to be given the means to ensure that they are delivered. Responding to national housing numbers is very difficult as land values are significantly different in different areas of the country.

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.]

No, not in isolation. While these are important indicators of quantity of development, in rural areas sustainability and protected landscapes are also critical issues which must be considered.

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.]

Only if there is adequate & meaningful opportunity for the local community to be involved in setting the allocated strategic housing sites. While we don’t agree with the zonal system, the principle that an allocated strategic housing site should be given automatic outline permission is a good one provided that there are restrictions met relating to environmental impact assessments, habitat requirements, infrastructure assessments etc. It would also require a good place shaping/design guide to be in place which any permission would have to conform to.

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.]

No. The provision of blanket permissions in renewal areas is extremely difficult as there will always be exceptions and arguments in the way in which they are interpreted. For example, the definition of infill and backfill can be complex and would be made impossible by this sort of blunt tool. There should be broad policies to be adhered to, not blanket approvals.

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.]

Yes. They would need to be driven by circumstances. The fact that this is proposed in the consultation demonstrates the problem with the simplistic zonal system being proposed.

10. Do you agree with our proposals to make decision-making faster and more certain?

[Yes / No / Not sure. Please provide supporting statement.]

No. While in many cases fast decision make is good, there will always be cases where local issues are complex and in those cases, good decision making through a local planning committee provides far greater acceptance in a community than imposition from above.

11. Do you agree with our proposals for accessible, web-based Local Plans?

[Yes / No / Not sure. Please provide supporting statement.]

Yes. We think this is an excellent idea and should be implemented.

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.]

No. While we agree that local plans should be developed as quickly as possible, the complexity of developing a plan for an area the size of Wiltshire and the need to consult with a wide and diverse group of communities makes a 30-month timescale unrealistic. It would require a very short period of 12 months for most of the development of policy and sites. That would require a huge officer resource which would have to be recruited and made familiar with a very large county area. They would then not be needed after a relatively short period placing an unreasonable strain on the council. Furthermore, legislation would need to be enacted by next autumn and most authorities would wait until it has been enacted before they started work and therefore the targets would not be met.

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

Yes. Neighbourhood plans have a key role in addressing climate change and identifying infrastructure issues at a local level. We believe that neighbourhood plans should be retained, with a clear role in the new planning system, and that they should deliver real power to local communities. But there’s no detail in the White Paper on the intended role or function of neighbourhood plans. Their scope appears to be stripped back to focus largely on design. Given that neighbourhood plans are time and resource intensive, and almost entirely developed by volunteers it is vital for local democracy that these plans deliver real additional power to communities. However, if we move to the zonal system suggested (which we do not agree with) then neighbourhood plans will either need to be an exception to the process or will need to be developed in conjunction with the local plan and running for the same length of time placing an even greater strain on the development of a local plan. The importance of neighbourhood plans to particularly rural communities is a key argument against the introduction of the zonal system. We are concerned that greater clarity needs to be given to communities in the guidance about what Neighbourhood Plans can and can’t influence. The process of updating Neighbourhood Plans should be simplified or they should be extended to run over a longer time span, in line with the local plan. The current situation where neighbourhood plans are being made increasing less valid over time and requiring frequent updating with all the effort that entails it not functional. Neighbourhood plans need to be linked more directly into the duration of the local plan.

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?

With a great degree of caution. While neighbourhood plans could have important local input on design, if they are able to override local plan design then that will not simplify but complicate planning. Having neighbourhood plans linked into digital planning tools makes a great deal of sense.

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.]

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Yes. The Local Government Association say there are 1 million houses with planning permission that have not been built. Not all planning permissions are created equal – developers will phase large-scale development permissions over a period of years whilst some will never be developed at all. Landowners expectations or requirements do not always dovetail with those of developers. Developers should be required to build out sites for which they have planning permission rather than forcing LPAs to accept more development to meet housing targets. Local communities will feel aggrieved if they are required to surrender more land for development when existing planning permissions have not been delivered

We strongly agree that assigned sites should be built out at a sensible rate after their approval. The problem here is that there is no incentive for developers to build out when house prices continue to appreciate and so they can generate greater future returns by sitting on development sites and waiting. There needs to be a system where if development does not occur it is possible for local authorities or government to force it to occur, perhaps through a local development company.

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]

There has been too much poor design, particularly when it comes to larger developments. There have also been too many developments which are poorly designed when it comes to fitting into and relating with existing housing and infrastructure. In our view it is critical that larger developments are designed with key principles in mind: Connectivity with surrounding communities. Reduced reliance on car transport. Residents of new housing estates have to rely on cars to get around. Opportunities to walk, cycle or use public transport are inadequate or non-existent. We need to build new houses, so good design is vital for ensuring that new developments are acceptable to the local community, as well as helping us to move towards a zero-carbon economy. More local renewable energy generation. health and wellbeing centred on active, connected communities. Better interrelationship between properties on a development. Suitable provision of community friendly open spaces. Etc.

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]

There is no one priority for sustainability. Water resources are scarce in this area so water recycling systems might be a priority here. We believe that the energy efficiency of new buildings is really important combined with local renewable energy generation easing strain on the South West’s electricity grid. More green and blue infrastructure is critical to enhance both wildlife diversity and people’s wellbeing. Open spaces that are used by the community and not just small parts of it are important as well. We want to see less reliance on cars but that needs managing with the need to have cars in a large rural area with limited public transport.

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.]

Yes. We strongly support the idea of design guides and codes. These need however to have local flavour to them and be able to serve the areas in which they are being used. The design guide that would apply in London cannot be the same as a guide which would be used in rural Wiltshire. Whilst there is permitted development within the planning system design codes will always be challenged. In other words it will be necessary to remove permitted development rights from certain developments.

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.]

Broadly yes. We would support a body to support design and place making. Out LPA feels that such a role in local authorities we agree that such a role is useful but would suggest that it does not need to be a stand-alone role and could be merged with other planning roles.

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.]

Yes. This is a good idea.

20. Do you agree with our proposals for implementing a fast-track for beauty?

[Yes / No / Not sure. Please provide supporting statement.]

Broadly yes. On paper this looks to be a good idea however we are concerned that if it were to become a box ticking exercise for developers who then implemented the minimum possible to comply then that would undermine the purpose of the proposal. It would need to define specific standards which would have to be delivered by developers, not then negotiated away in viability debates.

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]

Please apply the same answer to this question as to Question 4. A centralized approach is not helpful here, local flexibility to deliver the needs of communities where development is happening is most important.

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.]

Yes. The idea of a single levy makes sense however it would depend on how that could then be spent. If section 106 and affordable housing were rolled up in a single levy there is a risk of local pressure to provide popular improvements preventing there being enough funding for other critical infrastructure. It would depend on how the controls over expenditure of the levy were set. We do not agree with the idea of having a fixed proportion of development value above a set threshold only. All new housing will place strain on existing infrastructure and all new housing should contribute towards resolving that strain, not just developments over a certain financial threshold. We would like to see clarity on which tier of local government would access the funding and would hope that a percentage would still be issued to Parish & Town Councils to be used on local infrastructure provision.

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]

Locally. Housing market viability varies across the country as do the needs and demands caused by new housing. For example new housing in a large city will place strain on schooling which will be expensive but limited strain on roads. The same development on the edge of a town in a rural area will place a potentially slightly lower strain on schools (which may be cheaper to provide) but a much higher strain on highways and limited health infrastructure. SET 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.]

We would welcome an increase in value if the levy comes in. We would however want to make sure that the level set locally did not cause viability issues which prevented development.

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.]

Not sure.

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.]

Broadly yes. We would want to understand the evidence of the impact that this would have on people who are looking to improve their own house as a family grows or circumstances change to avoid having to move. This Town Council has had a number of large buildings recently converted into flats (our local bank and a large hotel) – we have not seen a penny of CIL for these developments because they are conversions and so we cannot make any infrastructure benefits to compensate for the added pressure of increased population. We are also concerned about the exemption for self-building. Whilst we would agree that an exemption should exist for people who are building their own house to live in as their home, builders also use the self-build exemptions to build properties that they intend to sell as soon as they are completed and move on to build another. This needs to be addressed in legislation. Here in Mere we have seen a number of new build individual houses but the developers have said that they are self-build (even though we know they are local developers and have no intention of living in the house themselves) and so, once again, they have found the loophole to get out of paying CIL and we get no infrastructure benefit

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.]

Yes. We are also keen to ensure that affordable housing is provided in rural areas and that there should be a contribution from all sizes of rural development where developers benefit from higher house prices.

The old formula was that the average house was 5 times the average yearly salary. Now the average house would cost 10 times the average yearly salary. This puts the regular housing market beyond the reach of many rural workers who struggle to get on the housing ladder. Affordable housing is an absolute necessity in rural areas in order to keep the area sustainable and stop our towns from becoming retirement centres.

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.]

We believe this is a complicated area. Developers are increasingly delivering lower quality affordable housing and it is becoming harder to find registered providers who will accept them in some cases. We would support Wiltshire Council in their view that developers should be required to offer land on development sites in lieu of affordable housing to a Council Housing Revenue Account or Housing Association who could then develop it themselves to a better standard or allow the developer to build on the site if they could demonstrate the delivery of a high standard of development.

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.]

Not sure

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.]

Not sure

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

[Yes / No / Not sure. Please provide supporting statement.]

Yes. We support our LPA who would welcome the ability to focus infrastructure funding on the specific needs that are being created by new development. Central control here does not help address local issues. Some areas however such as affordable housing should be mandated. We would hope that a percentage of the Infrastructure Levy would continue to be issued to Town & Parish Councils to be used on local infrastructure provision.

25(a). If yes, should an affordable housing ‘ring-fence’ be developed?

[Yes / No / Not sure. Please provide supporting statement.]

Yes. The provision of affordable housing, particularly in rural areas with very high house prices is essential for the development and function of our smaller communities. Affordable housing contributions must be ringfenced for affordable housing.

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 increased digitalisation of planning proposed in the consultation would need to address issues of groups who have more limited access to high speed internet connections, potentially the travelling community. It also needs to make sure that older people who are less likely to be digitally literate and those with other literacy problems can still access material.

1. https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/age\_uk\_digital\_inclusion\_evidence\_review\_2018.pdf [↑](#footnote-ref-1)