

Planning for the Future – consultation on the Government’s White Paper

Preamble: The Otter Valley Association (OVA) is a local amenity society with 900 members, covering five communities in the Lower Otter Valley in East Devon. Founded in 1979 to promote and conserve the built and natural environment and landscape of the valley. The OVA is actively involved in commenting on major planning applications and has supported the drafting of four neighbourhood plans. The OVA has also experience of producing a local design statement, adopted in Oct 2004 for development and control purposes as interim supplementary planning guidance by East Devon District Council.

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

Answer: This question trivialises an important subject that cannot be characterised in three words

Question 2: Do you get involved with planning decisions in your local area? [Yes / No] 10

Answer: Yes

If No, Question 2(a): If no, why not? [Don’t know how to / It takes too long / It’s too complicated / I don’t care / Other – please specify] – **Not Applicable**

Question 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]

Answer: The ordinary person-in-the-street needs a continuation of the present system. Physical notice near the property, post, newspaper and online

Question 4: What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

Answer: The environment, biodiversity and action on climate change/ Protection of existing heritage buildings or areas/provision of social housing for local people not as part of major development

Proposal 1 - simplified land use plans

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

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

Answer – No

The purpose of the proposals in the White Paper is to increase the rate of house building.

Until a decade ago, and for a long time before, central government decided housing numbers as part of a regional spatial strategy, or its various precursors. Local government then attempted to deliver these. If we are now to return to centrally imposed housing numbers, the government needs to address how it will achieve place-based sustainable strategic planning and why the previous ways of doing this failed.

What needs to come first is a workable strategic planning process.

It is our belief that without any idea of how the following topics of sustainable growth are to be integrated into the spatial planning of overall housing numbers, the policies in the White Paper will meet the same fate as Regional Spatial Strategies (2004 to 2010). These topics are: climate change; health and wellbeing; natural environment; regional economic growth; infrastructure provision including transport; levelling up - a particular worry in our seaside communities; prioritising investment and last, but not least, local democratic input and scrutiny.

The White Paper proposes a “Zoning” approach followed by permission in principle to develop. However this appears to be overly simplistic and does not reflect the local characteristics and circumstances that make many of the differing parts of England locally distinct. Dividing the whole country into just three zones is clearly ridiculous. How can Devon’s capital city, Exeter, be divided into the same three zones that cover a small rural village in East Devon, population 750, only ten miles away with no commercial areas? The virtue of the current system is that it allows for local plan policy to identify and distinguish differing spatial areas on account of the range of factors that are relevant to them and in so doing can highlight specific concerns. What is proposed is a blunt policy tool that does not allow for more nuanced and locally specific considerations to be taken into account. E.G. In what zone would agricultural land be placed?

Zoning in other countries typically use far more than these. New York, one of the earliest examples in the twentieth century, has 34 residential and 10 commercial zones.

Proposal 2 - Development management policies

Question 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.]

Answer – No

It is important that local authorities retain the ability to have local policies where there are locally specific issues that cannot be adequately addressed by national policy and that there is suitable consultation on the national development management policies. The White Paper appears to signal the end of Localism.

Proposal 3 - Sustainable development test

Question 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.]

Answer – No

Sustainability was at the heart of the NPPF.

A fundamental problem of the white paper is that it quite simply does not provide any detail of what a consolidated sustainability test could look like or may contain. In rural areas where access to public transport and medical services can be sparse, this problem is acute. There is a need to consider and weigh-up social, environmental and economic considerations in a structured, logical and consistent

manner noting the importance of both short, and more importantly, long-term time horizons e.g what infrastructure investment is planned. This is why we comment in our answer to question 5 on the need for a proper strategic plan to underpin any major growth in house building.

Two thirds of East Devon are covered by AONB designation, it also includes the European designated SSSI pebble bed heaths. These sites are at risk from the increase in footfall generated by increased housing. They are already surrounded by a 400 m total exclusion ban on any building and our local authority is required to find suitable alternative green space in mitigation for development already planned. The undesignated one third includes some of the best agricultural land. As we mention later, Grade 1 agricultural land has already been sacrificed for a new town of 20,000.

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

Answer –

The government’s approach throughout this White Paper appears to be to end localism and centralise planning decisions through centrally set housing numbers, national design guides and codes, standardised development management policies etc.

As we have mentioned in our answer to question 5 there does not appear to be any strategy for accommodating growth in England. The formulaic approach to housing numbers leads to massive growth in the south and yet in many places in the so called “northern powerhouse” housing targets will be reduced. This does not appear to align with any form of strategy for growth or government thinking on supporting the redevelopment of northern England. It shows that no thought has been given to where and how in England this growth can best be accommodated. It is these nationwide and regional decisions that are what the government need to be leading on and leave local government to the detail of delivering the government set strategy through local level policy making.

The OVA has actively supported local communities in the drafting of neighbourhood plans. We see the localism agenda as having successfully engaged communities and enabled people to get involved in planning in a way never before seen. To now impose national housing targets, nationally set design codes and development management policies on our communities is retrogressive and will be deeply unpopular.

Neighbouring Local Authorities will always have a need to co-operate to enable co-ordinated plan making and infrastructure delivery, whether there is a duty to do it or not. The current emphasis on cooperation is needed to replace the absence of overall spatial planning.

Proposal 4 - Standard method for establishing housing requirement

Question 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.]

Answer – No

We answer this question by discussing the flaws of the proposed approach under two headings:

1. Is the simplistic: build more houses equals greater affordability logic appropriate?
2. Does the algorithm pass the sanity check i.e. does it produce sensible and sustainable answers when realistic number are feed into it?

1. The logic: will further increases in house building make them more affordable?

East Devon is an attractive place for retirement so house prices are influenced by the relative affluence of potential retirees who can out bid the relatively low paid local house purchaser. In East Devon the 65+ population has reached 30%, and locally (e.g. in Sidmouth and Seaton) 40%. The figure for England is around 17%. We already have a significant proportion of second home owners hollowing out communities. The 2018 ONS comparison of median weekly earnings of those in full time employment shows employees in East Devon on £476, where the national average is £569. HMRC data, however, may reflect more accurately the impact of seasonal work: the average employee in East Devon took home £19,100 before tax in FY 2016/17. The median income across the UK is 24% more at £23,600. Our fear is that the service based economy in East Devon will be badly hit in the post Covid 19 economic conditions and comparative wages will fall further.

An extensive study conducted by CPRE Devon in 2018 provides us with the ratio of lower quartile house prices to lower quartile earnings (the commonly used measure of affordability). The Devon average is 8.4 (England 7.2) and the East Devon average has been consistently over 10 for the last decade, despite the fact, explained below, that we have a local plan built on an assumption of job growth that hasn't materialised

The Devon CPRE study also shows that 35% more houses are planned over the next 10 years than are required for anticipated population growth and inward migration. Most of these will be built on high quality agricultural green field sites. New-build homes, on average, cost more than existing homes. The average priced new build is 18%, and a lower quartile new build is 27% more expensive than an existing home.

There is no "planning blight" in Devon, especially not in East Devon. The evidence points to the fact that the private sector has not been able or willing to build the affordable homes needed. Subsequent viability assessments have often led to the loss of the affordables promised at the time of planning approval.

For example, at the start of the East Devon local planning process in 2011, the Budleigh Salterton Town Council agreed to re-designate a site outside the Built-Up Area Boundary, but within the protected AONB, the primary objective of the scheme to provide affordable housing for local people, but with some open market houses needed to keep the cost of the affordable houses down. The provision of 62 houses, with 42 of these to be affordable, was approved by the council with assurances from the developer that funding was available. These 42 affordables were reduced to 24 in 2016 and then to just 5 in 2018. This is not an isolated case.

Low earnings are the major factor in affordability. We are building plenty of houses but not the right sort in the right places. We believe that developers control the price through controlling the build out rate (see below).

Much more attention should be given to Government actions and interventions that could be relevant in establishing a more equitable housing market. Building more houses is likely to have a

negligible impact on houses prices compared to other interventions the Government could undertake. The comparative cost of renting should also be taken into account in determining appropriate levels of house building.

We quote from Sir Oliver Letwin, March 2018:

“The fundamental driver of build out rates once detailed planning permission is granted for large sites appears to be the ‘absorption rate’ – the rate at which newly constructed homes can be sold into (or are believed by the house-builder to be able to be sold successfully into) the local market without materially disturbing the market price. The absorption rate of homes sold on the site appears, in turn, to be largely determined at present by the type of home being constructed (when ‘type’ includes size, design, context and tenure) and the pricing of the new homes built. The principal reason why house-builders are in a position to exercise control over these key drivers of sales rates appears to be that there are limited opportunities for rivals to enter large sites and compete for customers by offering different types of homes at different price-points and with different tenures.”

2. Does the algorithm pass the sanity check?

East Devon’s local plan 2013 to 2031 was adopted in 2016. Housing needs are based on an aggressive jobs led growth scenario. This assumes the creation of 950 jobs/year compared to 200-234 jobs/year estimated from demographic trends, inward migration etc. Data published by EDDC in 2019 indicate average full-time equivalent job growth of only 260 jobs/year. These jobs haven’t materialised so planning permissions are running well ahead of those needed for job growth. This is unsustainable. It will lead to a slowing of the build out rate; increased commuting for those looking for work; and an increase in second home ownership and retirement migration.

Two thirds of East Devon are covered by AONB protected landscape designation meaning that land for the majority of all new housing has to be found from the remaining one third much of which is either in the local river flood plains or is agricultural land.

Just over ten years ago the people of East Devon were persuaded that to build a new town (Cranbrook) on GRADE 1 AGRICULTURAL LAND on the north western edge of the District. The premise was that this sacrifice would account for population growth for the foreseeable future in the district. It started at aiming for a population of 2,900 in 2012 and is now projected to reach 22,000 eventually, swallowing up nearby rural villages in the process. By growth the historic towns of along the eastern bank of the river Exe have now merged into a solid commuter belt stretching from the sea at Exmouth to Exeter.

According to Litchfields the algorithm will impose a 70% increase in this already over inflated housing target at a time of post Covid-19 economic recession. Sadly, Covid-19 will have had a catastrophic impact on our local economy 86% of which is based on service industries such as tourism and hospitality.

This level of increase is simply not a credible prediction and much less so a credible policy response when it comes to planning for housing provision. A notable point as the Government does not have a plan for England and less so one that is open to scrutiny or challenge through plan making

mechanisms. Should the Government seriously consider that these kinds of increases are sensible they should set them out in a plan under a mechanism that is open to testing and challenge.

Question 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.]

Answer – No

Supporting statement to the response

The fundamental problem of using affordability as an indicator of levels of need for future house building is that it is neither a good nor appropriate indicator. It based on simplistic economic concepts that assume an idealised “perfect market” operates when clearly it does not. Local evidence, see answer to question 8(a), is that increasing the supply of homes is not an effective way to reduce their price. Changes to interest rates or wages, for example, are far more meaningful matters to address in order to make housing more affordable to those wishing to rent or buy a property. Furthermore, even if affordability had greater credibility, in principle, to inform future levels of house building need the proposed standard methodology is remarkably crude and it generates housing requirement levels that in some areas bear no relationship with any reasonable assessment of need.

Looking at the extent of urban areas, or how many people live there already, and increasing the size by an amount derived by a price comparison algorithm would be a very crude tool to use when looking at suitability and appropriateness for development. To look to the current size as a key determinant of an appropriate future size misses the whole point of planning. We need a logical, reasoned assessment, to create a place-making agenda in association with meeting community needs and aspirations that go alongside it. The proposed approach just leads to the continuation of previous trends of growth rather than looking holistically at England and where growth could best be accommodated and how the best outcomes for the nation could be achieved. The current approach will simply continue to cram growth in the increasingly crowded and constrained south rather than supporting the economic growth of northern areas. I.e. we are back to the need for a strategic plan.

Proposal 5– routes to gaining permission to build in growth areas, renewal areas and protected areas

Question 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.]

Answer –No

The OVA reviews most major planning applications in its area. Increasingly these have used the outline planning permission route which is the precursor to the automatic permissions mentioned in the question. We have found this profoundly unsatisfactory for the following reasons.

Our experience is that developers, even on the small scale, game the system by seeking approval of outline schemes promising a significant number of affordable housing and infrastructure. Having obtained permission the developer subsequently pleads poverty and revises downwards eg. King Alfred's Way, Newton Poppleford outside the BUAB but within the AONB. The promised medical centre has gone for housing and the affordable housing numbers been reduced.

Here is another example. At the start of the East Devon local planning process in 2011, the Budleigh Salterton Town Council agreed to re-designate a site outside the Built-Up Area Boundary, but within the protected AONB, for building. The primary objective of the scheme was to provide affordable housing for local people, but with some open market houses needed to keep the cost of the affordable houses down. 62 houses with 42 of these to be affordable was approved by the council with assurances from the developer that funding was available. These 42 affordables were reduced to 24 in 2016 and then to just 5 in 2018.

Just over ten years ago the people of East Devon were persuaded to agree to build a new town (Cranbrook) on Grade 1 Agricultural Land on the north western edge of the District that would account for population growth for the foreseeable future in the district. It started at aiming for a population of 2,900 in 2012 and is now projected to reach 22,000 eventually, swallowing up nearby rural villages in the process. By growth, the historic towns along the eastern bank of the river Exe have now merged into a solid commuter belt stretching from the sea at Exmouth to Exeter.

Originally, the new town was to have been "planned" by East Devon District Council but the government of the day decided that Cranbrook should become an example of a "developer led" community. Demonstrably, this has not been a success. After eight years it remains a housing estate with no town centre or associated facilities. From a commercial point of view, investment in the town centre will always command a low priority.

Question 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.]

Answer – No

These proposals don't simplify anything.

Question 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.]

Answer – No

East Devon District Council, in their response to this question say: "Our experience of developing Cranbrook new town in East Devon has shown how very difficult it is to get community acceptance of a new settlement being built when it is imposed on the existing residents from above. It is vitally important that local communities are fully engaged in new settlements in their locality from inception through to delivery and in order to achieve this it is important that they brought forward by their local council with local representatives fully engaged in the work and able to guide the form and scale of the development.

Intervention from above at the national level is unnecessary to get new communities built when incentivising local councils to bring them forward in a form that they would be content with is a far more acceptable strategy. If sufficient funding were available to deliver high quality new communities that will genuinely meet local housing needs with the required infrastructure being delivered upfront then there would be much more support for new communities. Locally led development corporations provide a route for local authorities who are willing to do this and greater government support for this approach and funding to help authorities to deliver through this route would be a far more acceptable way of delivering new communities.”

We agree with their observation and would emphasise the need for high quality housing that genuinely meets local needs with the required infrastructure being delivered up front.

East Devon has a low wage economy (£19,100 before tax in FY 2016/17 see our evidence in question 8(a)). Our concern is that the White Paper simply does not discuss how social housing can be provided for people on wages as low as this.

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

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

Answer – No

Recent attempts at streamlining the system have only made matters worse. Permitted development, for example, which allows development within set criteria without planning approval, has led locally to abuse. We have already given examples in our answers to question 9(a).

We welcome the use of technology but it will always have its limitations and it is difficult to see how technology could make many of the subjective judgements that planning officers are routinely required to make when considering the impacts of developments and the views of residents. Planning is not and never could be a simple tick box exercise of assessment against a rule book. Many parts of East Devon do not yet benefit from high speed broadband and many struggle with using the existing technology used for planning applications through the planning on-line system and downloading plans.

There should not be any heavy reliance on technology and algorithms to help decide whether a planning proposal meets the requirements of a design code. This is likely to result in a uniformity of development which would not meet the aims of building beautifully. Quality will only be achieved through the appropriate interpretation of design codes, subject to independent scrutiny by LAs and the local community. Planning is not and never could be a simple tick box exercise of assessment against a rule book.

Making the 8 and 13 week targets absolute requirements or introducing fee returns or deemed consents will deny the local community any form of meaningful engagement, another blow to “Localism”.

Proposal 7 - Standardising Local Plans

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

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

Answer – Yes

Use of digital and social media should certainly be considered as an essential part of engagement and consultation. However, engagement and consultation activities also need to be inclusive, including for people with limited or no access to IT. Digital technologies are good at supporting quick communication between citizens, planners and decision makers are now operating. Ultimately both traditional and modern interactive approaches will need to be taken in order to engage all groups in society

Proposal 8 - 30 month timetable for Local Plan production

Question 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.]

Answer – No

Public trust must be at the forefront of planning if it is to have any chance of public acceptance. This can only be achieved by adequate consultation. Without further details about the proposed process and the work that each stage would entail, particularly stage 2, it is difficult to understand how a 30 month statutory timescale could be achieved.

Proposal 9 - Retaining Neighbourhood Plans

Question 13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

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

Answer – Yes

Neighbourhood plans seem to have been given a diminished role in the White Paper.

The OVA has actively supported local communities in the drafting of four neighbourhood plans. We see the localism agenda as having successfully engaged communities in this way and enabled people to get involved in planning in a way never before seen. We believe that the enthusiasm of the uptake of neighbourhood planning in local communities is a sign of healthy communities and democracy.

Neighbourhood plans have proved very popular in East Devon with 19 made neighbourhood plans and more than 20 others in production. It is vital that neighbourhood plans continue to guide development in the district.

Question 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?

Answer:

In the OVA's experience neighbourhood plans can only be developed using a high degree of digital skills within the community. To us this not an issue.

Within a neighbourhood boundary there will be substantial number of areas, each of which exhibit their own character. For example: East Budleigh is the birthplace of Sir Walter Raleigh with mediaeval cob and thatched cottages with external chimney stacks added in the seventeenth century but it has many cottages built as part of the “model farm” building programme of the late 1800’s to house agricultural workers. In contrast, three miles away, Budleigh Salterton is a seaside resort comprising Georgian, Edwardian and Inter-war year houses in large gardens.

“Government issued” patterned books are unlikely to be of use in these communities.

Proposal 10 – A stronger emphasis on build out through planning

Question 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.]

Answer – Yes

We support East Devon District Council’s response. “Our experience of Cranbrook new town has shown how a large new community being delivered by a small range of housebuilders delivering similar products leads to relatively slow build out rates. Any measures that would increase build out but also deliver a wider range of new housing and increase competition to improve quality would be welcomed. It remains unclear exactly how this is to be achieved as the ownership of land and how it is disposed of is key to achieving this. At Cranbrook the first phases have been delivered by a consortium of a small number of developers who have had control of the land from the early stages. The development was master planned and design guides produced. These routes alone will not lead to diversification it is wider process of addressing the land market and how sites are brought forward more generally that is needed. Models where a development corporation or public body have brought forward development on their land and acted as master developer have been far more successful in achieving diversification, quality and build out. It is these mechanisms that need to be explored further to address this issue.”

Question 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]

Answer

Other – New developments contain elements of all of the above. Where they fail is that very few fit within their settings and all have failed to provide their affordable home quota.

Question 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]

Answer

We dispute that practical sustainability can be achieved in any process in which central government fixes local housing targets in the absence of any strategic spatial planning.

Where is climate change specifically addressed? How will the necessary infrastructure be planned and provided? The infrastructure levy is not adequate and will never provide this in advance.

Proposal 11 - Design guidance and codes to be prepared locally with community involvement

Question 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.]

Answer – No

In our answer to question 13 we illustrated the richness of rural England. We made the comment: “Government issued” patterned books are unlikely to be of use in these communities. It is not simply a matter of stand-alone design codes. There are also vital issues regarding climate change and quality which are only perfunctorily addressed in the White Paper and should go hand- in-hand with design.

Proposal 12 - To support the transition to a planning system which is more visual and rooted in local preferences and character

Question 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.]

Answer – No

This would only result in a centralised “one size fits all” solution.

Where would the resources come from and how long would it take to implement?

This is another example of how the White Paper is attempting to usurp local democracy. A good neighbourhood plan covers this. The OVA has experience of producing a local design statement, adopted in Oct 2004 for development and control purposes as interim supplementary planning guidance by East Devon District Council.

Proposal 13 - Homes England design focus

Question 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.]

Answer – Yes Supporting statement to the response

As the non-departmental body funding affordable homes, obviously Homes England should champion design as much as climate change.

Proposal 14 - Fast track for Beauty

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

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

Answer – No

We are concerned that implementing a fast track for beauty might result in a speedy rather than a correct decision being taken. We also have concerns that the use of “pattern books” and “a limited set of form-based development types” might limit the opportunity for innovative design that respects local distinctiveness. See answers to question 13.

Experience in East Devon has been that design quality in housing has sometimes been lost when delivered by volume builders.

Proposal 15 - Amending the National Planning Policy Framework

(No questions on this proposal)

Proposal 16 - Streamlined assessment of environmental impacts

(No questions on this proposal – further consultation expected)

Proposal 17 - Historic conservation

(No questions on this proposal)

Proposal 18 - Energy efficiency standards for buildings

(No questions have been included in the white paper for this proposal.)

Proposal 19 - Reforming Community Infrastructure Levy (CIL)

Note: there is no question 21!

Question 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.]

Answer – beyond out brief leave this question unanswered

Question 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]

Answer – beyond out brief leave this question unanswered

Question 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.]

Answer — beyond out brief leave this question unanswered

Question 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.]

Answer – – beyond out brief leave this question unanswered

Proposal 20 - Capturing changes of use in Infrastructure Levy

Question 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.]

Answer – – beyond out brief leave this question unanswered

Proposal 21 - Infrastructure Levy to deliver affordable housing

Question 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.]

Answer – Yes

All parts of the country from metropolitan areas to the smallest rural communities need more affordable homes. But building more market value homes in the expectation that this will provide them has completely failed in East Devon. An even more pressing problem, not addressed in the White Paper, is the need to provide more social housing.

Question 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.]

Answer – – beyond out brief leave this question unanswered

Question 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.]

Answer — beyond out brief leave this question unanswered

Question 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.]

Answer — beyond out brief leave this question unanswered

Proposal 22 - Increased freedom for spending Infrastructure levy

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

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

Answer — beyond out brief leave this question unanswered

Question 25(a) - (note this question is a follow on to Question 25) If yes, should an affordable housing 'ring-fence' be developed?

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

Answer — beyond out brief leave this question unanswered

Proposal 23 - Resource and skills strategy

Views are not sought on these proposals but it is considered that they should generally be welcomed albeit performance frameworks have historically focused on timescales for decision making rather than the quality of service and decision making which is unfortunate.

Proposal 24 - Strengthened enforcement powers

No details are included and no questions are asked on this section.

Equalities impact

Like all public authorities the government is required to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations.

Question 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?

Answer – No