



The countryside charity
Norfolk

15 Pigg Lane
Norwich
NR3 1RS

Telephone: 01603 761660
Email: info@cprenorfolk.org.uk

www.cprenorfolk.org.uk

Working locally and nationally to promote, protect and enhance a beautiful and thriving countryside for everyone's benefit.

29 September 2020

White Paper: Planning for the Future – consultation response, CPRE Norfolk

Consultation questions numbered and shown in bold.

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

Essential; Balanced; Development.

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

Yes

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]

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 planning proposals in the future? [Social media / Online news / Newspaper / By post / Other – please specify]

We disagree with the statement at the start of this question as your proposals will not make it much easier to access plans as they aim to be fully digital. This will seriously disadvantage those (for example many more elderly, less wealthy or who live in areas of poor connectivity, which are often more rural locations) with no such or difficult access to digital technology. Moreover, there will be fewer opportunities to contribute views to planning decisions, as it appears that the only opportunity will be provided at the formation of Local Plans, when decisions will be taken as to how land will be 'zoned'. There will be no way for residents to contribute their views on individual planning applications to the extent that they can at the moment, as this level of consultation will be removed for Growth and probably Renewal zones. This would be a huge loss to local democracy, and would leave the public feeling and being disconnected from planning decisions.

All means of communication should be used to enable plans and planning proposals to be disseminated. It is important that digital-only methods are not the only ones to be used, due to access and connectivity issues for many, particularly those living in rural areas.

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]

The environment, biodiversity and action on climate change.

Increasing the affordability of housing.

Protection of green spaces [including open countryside]

5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

No. The proposal to have three zones for planning is of great concern. By designating Growth areas, potentially huge amounts of land will be allocated for development, with residents and others having no right to comment on planning applications once the land has been designated. This is of particular concern as sufficient land is already allocated for development such as housing under the current system: there is therefore no need to allocate yet more land. If this is done, developers will cherry-pick the most profitable sites, which would unlikely to be those in the most sustainable locations. For example, land for more than 30,000 houses is allocated in the current Local Plan for the Greater Norwich area, and yet they haven't been built-out. Instead of allocating yet more land for housing, action should be taken to ensure sites already allocated for housing are completed, especially as these sites are likely to be in more sustainable locations.

The proposal for 'Renewal' areas is unclear. It is stated that "it could include the gentle densification and infill of residential areas, development in town centres, and development in rural areas that is not annotated as Growth or Protected areas, such as small sites within or on the edge of villages." However, we note the use of "could", suggesting that other definitions could be used, such as the possibility of permitting more areas of open countryside currently outside development/settlement boundaries to be designated as a 'Renewal' area. Given that automatic permission could be granted for 'Renewal' areas, this would again take away the opportunity for residents and others to comment on applications, which would contribute further to creating a democratic deficit if these proposals are adopted.

For 'Protected' areas the devil may well lie in the yet to be published detail. At first glance it is encouraging to read that these: "would also include areas of open countryside outside of land in Growth or Renewal areas." However, this would only be welcomed if the areas included in Growth and Renewal areas are not allowed to encroach into areas of open countryside, in addition to the concerns above regarding the unnecessary extent of Growth areas in particular. The current system generally protects open countryside, which is most of the countryside in England: this protection needs to be retained. Open Countryside should be designated in its entirety as "Protected".

The so-called "simplification" would lead to a major democratic deficit. In the current system it is possible for anyone to comment on development proposals at all stages of the planning process including when local plans are formulated and when planning applications are made. This will change for residents who discover that they are living in one of the new Growth Zones. Here, developments, as long as they conform to central government guidelines, will be granted automatic planning permission. The same automatic permission could also apply to developments proposed in areas defined as Renewal Zones. A large proportion of the public will therefore lose its right to comment on individual planning applications. People living in Growth and Renewal areas will only be consulted during the period when their planning authority is preparing its local plan. CPRE Norfolk knows that most people do not engage in these kinds of consultations and that they only become involved when there is a local threat posed by a controversial planning application. The proposed legislation would rob many of their chance to do this.

The alternative option laid out in 2.12 while still not being as satisfactory as the current system, would be the least bad of the given options, so long as controls were set on the extent of Growth areas, bearing in mind our comments regarding over-supply of land for housing.

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.]

No. The NPPF already sets out general planning policies nationally and the Development Management policies of local authorities allow specific detail relevant to a given area (that is not sufficiently covered by the NPPF) to be factored in. The combination of the NPPF and Development Management policies is effective at enabling the planning system to function well: as it's not broken don't try to fix it.

In addition, there is an important opportunity here for large strides to be made towards ensuring environmental and climate change targets are met, by including much more ambitious policies regarding the design of new housing. It is

unclear how the design guides and codes mentioned in 2.14 would relate to national guidance, although it is important that local circumstances can be catered for.

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.]

No. We are concerned that “a simplified process for assessing the environmental impact of plans” would in fact be a watering down of current environmental safeguards, to enable development to proceed quickly.

We are against the alternative option in 2.22 which would lead to the allocation of even more sites for development: it is much more important to ensure that sites allocated in Local Plans are actually delivered.

We propose (as a solution to land banking and as a means of ensuring that Greenfield sites allocated in new and emerging local plans for housing are not “built out” until existing sites in current plans have been developed) that a phasing system should be introduced with a requirement that existing allocated sites must be developed first. In Norfolk 156 parish and town councils have signed a pledge of support in favour of this approach, and we strongly advocate that the White Paper adopts this concept of phasing as a principle that must be followed throughout England.

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

If the duty to cooperate is being removed then central government oversight will be essential. There should not be any temptation to increase the influence or powers of Local Enterprise Partnerships, which are unelected, lack transparency and are largely unaccountable. Cross boundary issues are more effectively dealt with through liaison between neighbouring authorities.

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.]

Yes – subject to the following.

There is already a standard methodology for establishing the housing requirement for a local authority involving the use of ONS household projections, plus a buffer and with adjustment using the Affordability Equation. This needs to be reformed by: firstly insisting that the very latest ONS projections are used; secondly through the abolition of the buffer because its usage in many areas merely inflates housing targets way above the level that the housing market can deliver thus creating even more land banking, and thirdly by abolishing the Affordability Equation.

Increasing housing targets in expensive or unaffordable areas (e.g. North Norfolk) is not a solution to the social housing crises. The standard methodology should enable local authorities to compulsory purchase brownfield land (at existing land values) to address local waiting lists and then allow those authorities to build social housing on these sites. This housing should be rented (and not sold) to tenants at an affordable rate.

Small groups of new houses, often referred to as Windfalls in the current system, should always count towards housing targets and not be “in addition” to those targets. Furthermore, targets should not be described as a minimum requirement – they should provide a cap on numbers. The absurd, 5 year land supply rule, which can be manipulated by developers to obtain additional sites, should be abolished.

The system we currently have requires councils to produce a local plan and allocate land for housing, which then has the presumption of planning permission subject to the detail. Consultation on these sites is via the local plan process. To obtain permission, developers will need to offer the required level of community benefits including a certain number of affordable houses. Once planning is granted, which will be subject to the rigour the planning system brings but is only

open to appeal by the developer if the application is rejected, a number of things will occur. Sadly, this does not always involve the developer starting on site. The land may be land banked in the expectation of future increased prices. It can be subject to the developer bring to the council a development appraisal that shows unless changes are made - usually the deletion of affordable housing - then the developer cannot reach a 20% profit level, set by government policy. In fact, affordable housing provision today is quite nominal, as is the provision of social housing.

When house building in a council's area does not then meet the governments calculated delivery rate against the target set, then the local authority is in a position of having to allocate further sites on top of those already allocated in the next refresh of their local plan. Allocating more sites in this way increases the number of sites available above the level required, but there is no mechanism for taking sites out of allocation or removing unused planning consents. As developers build to the market for houses that command prices where the deemed profit level can be reached, not to the need for affordable or social housing provision, this increase in the supply of sites without an accordant increase in demand does not create any more new houses. However, developers have a larger choice of sites, and so they 'cherry pick' the best sites which are easiest to build and are attractive to buyers.

We have a situation where more and more land is allocated for housing, meaning that more and more green virgin countryside is being made available for development, even when a surplus of land is available. Under our system therefore land that is best placed for development and environmental protection such as land near transport links and facilities, or suitable for those on lower incomes, can remain undeveloped whereas sites in expensive rural areas on Greenfield sites will be built out. In real terms this means councils lose the ability to implement or control development in their areas, and at the same time the allocation of land does not increase the number of houses being built, or provide anything other than a very nominal amount of affordable housing. The solutions to this so far have been to subsidise some housing, but this is only a very short-term measure as those houses soon revert to the higher prices commanded in the development.

The solution is to only bring new sites forward when the majority of allocated sites have been developed, and at the same time take away the onus for affordable and social housing and funding a major new wave of council house building. The right to buy scheme would need to be removed so the stock level can once again grow. This will have the effect of controlling private rents and giving housing opportunity to those disadvantaged by the current system and high prices.

At the same time the provision for a set profit level needs to be removed, and allowing a double profit from every scheme forcing up prices to be stopped. The current system has allowed land prices to have increased considerably as a percentage of the whole development cost, subsidised by allowing a reduction in community benefit and affordable housing provision.

In Europe a system of land tax is used, where excess profits from land sales are used to support the social elements and infrastructure of schemes. If you consider the massive price rise of a piece of land comes about as a result of the grant of planning consent, effective by the community itself, then you can see such a system is not inherently unfair. So funding is available for the UK to move to an approach to cure the ills of current housing policy.

Sadly, a very different approach is being proposed. It blames the housing crisis not on changes in government policy, or a lack of social housing, but on the planning system and people concerned to bring to the attention of decision makers where a development may be inappropriate. Whilst the changes are feted as something new, they simply follow the process currently in place, but with potential for causing even more damage.

Rather than providing an ever-larger buffer to housing numbers it is more important to introduce measures to ensure that allocated sites and permissions become completions.

When calculating housing numbers from any new methodology, it is crucial to use the most up-to-date independent statistics available, as has not been the case in the recent past, with the persistence of using out-of-date 2014 ONS figures, rather than those from 2016 or 2018.

It is also important that housing provided as 'windfalls' are taken into account in any system for calculating housing numbers and for meeting housing targets.

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. This appears to be a very crude way of assessing housing targets, when a much more nuanced system is required. The overall target of building 300,000 new homes annually seems to override the real need to determine what types of houses are needed in which places. By fixing targets for each Local Authority they would be obliged to designate more land for 'growth', when those areas with adopted Local Plans already have more than sufficient sites allocated for housing, without the need to allocate more land. The main problem is ensuring that existing permissions are built-out, not to allocate more land. If this approach is taken, developers will inevitably 'cherry pick' the most attractive and profitable sites to develop, which will frequently be those on green field, more rural, locations.

The proposal to provide proportionately more housing in areas of low affordability, which are often south-east urban areas, will do little to 'level up' the Midlands and the north of the country. Simply by building more houses in areas of low affordability will not lead to lower house prices, as the history of the housing market in the south-east demonstrates.

The Affordability Equation should be abolished - see response to 8 (a).

The proposal to develop brownfield sites, needs to be strengthened further so that a 'brownfield first' policy is adopted.

Rather than providing an ever-larger buffer to housing numbers it is more important to introduce measures to ensure that allocated sites and permissions become completions.

When calculating housing numbers from any new methodology, it is crucial to use the most up-to-date independent statistics available, as has not been the case in the recent past, with the persistence of using out-of-date 2014 ONS figures, rather than those from 2016 or 2018.

It is also important that housing provided as 'windfalls' are taken into account in any system for calculating housing numbers and for meeting housing targets.

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.]

No. We can make the processes for both Local Plans and planning applications simpler, but the public needs to have meaningful influence at both stages. Allowing permission in principle would not necessarily simplify the planning system nor lead to better designed houses of the needed tenures.

It is very rare for a local planning authority to change its mind about the principle of development on a site allocated in a development plan, unless circumstances have changed, such as the discovery of previously unknown wildlife or heritage value (which permission in principle would not overcome). Conversely it is very common for that the applicant to come

forward with a proposal that either (a) while according with the plan allocation in terms of location, scale and mix of uses, is of a poor quality design or fails to meet 'technical details' in terms of provision of affordable housing or infrastructure, or (b) significantly exceeds the scale of development envisaged in the local plan; again permission in principle would not overcome this issue.

It is clearly the case that members of the public usually become involved in the planning process when an application that would directly affect them enters the system – to deny residents their fundamental right to comment at such times and to deny the local authority the opportunity to oversee the process is an affront to local democracy – one of our most basic rights would be lost.

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. There is an immense democratic deficit in these proposals. We can make the processes for both Local Plans and planning applications simpler, but the public needs to have meaningful influence at both stages. Allowing permission in principle would not necessarily simplify the planning system nor lead to better designed houses of the needed tenures.

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.]

No. We have concerns that if this was allowed then it would be possible to override 'protected' status where such settlements are proposed in protected zones. Although it may still be possible to bring forward new settlements in protected zones, there is a need to maintain the current system of consent, rather than following the NSIP regime which is less straightforward for communities to engage with. It is important that decisions with such major impacts on local communities are made by the Local Planning Authority.

10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]

No. Throughout the White Paper consultation document there is constant reference to residents being able to benefit from a much more democratic planning system, and yet there is no clear point at which consultation responses on this important aspect should be entered: this question appears to be the logical place for such comment.

There seems to be disingenuous attempts to convince readers that their voices and opinions will be listened to more than they are in the current system, yet the detail suggests otherwise. At 1.22 it is stated that "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", without being clear that it appears that they will not have any opportunity to be listened to at the equivalent of the planning application stage, at least in 'growth' and probably 'renewal' zones, as at present. Instead, the same paragraph promises: "people will be able to use their smartphone to give their views on Local Plans and design codes as they are developed". This is clearly not the same level of public engagement as is currently possible: the public already takes part in various consultations for Local Plans, and they also have a great deal on input at the planning application stage. To take the latter away is a hugely worrying and undemocratic proposal. We suspect that, among other consequences, this would result in a massive amount of public disquiet once it is realised that they have no right to comment on planning applications, and will only be allowed to comment at the formation of Local Plans.

The proposal to move away from document-based applications to a completely digitised system, where it will be "radically easier to raise views about and visualise emerging proposals whilst on-the-go on a smart phone" shows a woeful understanding of how many in more rural areas, as well as others in urban areas, are able to access such technology. Age, wealth and connectivity are very important limiting issues to consider.

The proposed system will not fulfill your stated wish at 1.12 to "move the democracy forward in the planning process and give neighbourhoods and communities an earlier and more meaningful voice in the future of their area as plans are made." Instead there are fewer opportunities for public engagement in the planning process, and further disenfranchisement due to issues with access to digital technology.

At present, a wide body of opinion is brought to bear on a planning application. The views of parish and town councils, statutory consultees, other organisations and the general public are listened to. Streamlining in the method suggested is really silencing some if not all of these voices and is not acceptable.

11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

Not sure. Whilst the intention to provide a more streamlined and accessible system is laudable, it should not be at the expense of those who are unable to access web-based systems.

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. A one size fits all timetable is not flexible enough and therefore not appropriate.

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 enabled communities to engage with the planning system and to give them some ownership of local issues. It is important that this progress is maintained.

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support? [Yes / No / Not sure. Please provide supporting statement.]

Yes. The system we currently have requires councils to produce a local plan and allocate land for housing, which then has the presumption of planning permission subject to the detail. Consultation on these sites is via the local plan process. To obtain permission, developers will need to offer the required level of community benefits including a certain number of affordable houses. Once planning is granted, which will be subject to the rigour the planning system brings but is only open to appeal by the developer if the application is rejected, a number of things will occur. Sadly, this does not always involve the developer starting on site. The land may be land banked in the expectation of future increased prices. It can be subject to the developer bring to the council a development appraisal that shows unless changes are made - usually the deletion of affordable housing - then the developer cannot reach a 20% profit level, set by government policy. In fact, affordable housing provision today is quite nominal, as is the provision of social housing.

It is important that measures are put in place which ensure that the vast majority of houses on allocated sites are built-out before further allocations of land are added (or added to 'growth' zones) to Local Plans. In the current system, where new allocations are added, or where Local Authorities cannot demonstrate a 5-year land supply for housing, existing sites are frequently not developed, but instead developers build out more profitable, but often less sustainable sites which have been added at a later date. A phased approach to ensuring houses in more sustainable and on more long-standing allocated sites are built-out, before other less sustainable and more recently allocated sites are developed is essential if confidence in the system is to be restored. This common-sense approach has led to nearly 30% of Parish and Town Councils across Norfolk signing a pledge calling for this. See our comments under question 7(a).

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]

Much of it is ugly and/or poorly designed.

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]

Other. You claim that “sustainability is at the heart of our proposals” and yet it is hard to see evidence for this. Instead, it would appear that development is at the heart of the proposals, with little consideration for the vital need to combat climate change and to reach net-zero for greenhouse gas emissions by the not ambitious enough date of 2050. It is these necessities which should be at the heart of the planning system, rather than being what appears to be an inconvenient ‘add-on’. In our local area, “sustainability” should lead to development being concentrated on brownfield sites and close to (or preferably inside) existing settlements in order to minimise the loss of Greenfield land, encourage less car usage and facilitate better and easier provision of public transport. There is little evidence that this is currently the case and the White Paper’s proposals do not provide the necessary reassurance that this will change for the better in the future.

17. Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement.]

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making? [Yes / No / Not sure. Please provide supporting statement.]

No. Planning Policy Officers already fulfill these functions. Creating new posts is expensive and unnecessary

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.]

No. Building the quality homes we need, in the places local people want to see them, at a quicker rate is certainly important. Sir Oliver Letwin’s Review of Build Out has set out how we can do this – in particular through local authorities taking a lead role in acquiring land and requiring a wider variety of housing types. The Government should implement that review but the White Paper does little or nothing to set out how the planning changes proposed by Letwin might be taken forward.

20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

Not Sure. Prioritising Beauty is of course a laudable objective. This can best be achieved by protecting the wonderful and varied landscapes and historical townscapes of England and by not swamping them with over-development in ill-conceived Growth Zones. It’s easier to protect beauty where it already exists than to create it afresh (although we should always try to do this as well). Fast-tracking beauty is difficult e.g. a newly planted oak tree will take decades to mature whereas felling a mature oak to make way for a development takes only a few hours.

We are very concerned that there are no questions in this consultation about a number of key proposals in the White Paper, namely those about “effective stewardship and enhancement of our natural and historic environment”, therefore we comment on them at this point in the consultation. This omission suggests that this area of planning is not a particularly high priority for the Government, which is a major concern. We hope this is not the case and that the separate consultation mentioned at 3.28 will allay these fears.

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]

More affordable housing – genuinely affordable of various tenures, much of which need to be maintained as social housing in perpetuity. The separate proposals for First Homes will not meet these needs.

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.]

Not sure. It largely depends on what regulations would be in place to ensure that the right quantities of truly affordable homes of the needed tenures are provided in the right locations.

22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement.]

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]

Yes. However, these measures will still not deliver the needed amount of truly affordable housing. Rather than slavishly following the drive simply for greater numbers of houses, with the mistaken belief that this will lead to greater affordability, it is essential that government acts to provide the large amount of truly affordable housing which is required, through allowing and funding Local Authorities to build this much-needed housing.

It is essential to increase the supply of homes in affordable tenures as a proportion of total supply, and to do more so where affordability is worse. It is important that the needed numbers of houses for social rent and other tenures which ensure the stock of affordable housing are maintained as such in perpetuity.

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.]

No. Affordable housing needs to consist of a variety of tenures according to local housing need, with it being important that social housing is maintained as such in perpetuity, without the option of right to purchase. Also see our response to question 8 (a).

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]

24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

Yes, although see response to question 25a.

25(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

It is essential to increase the supply of homes in affordable tenures as a proportion of total supply, and to do more so where affordability is worse. This would eliminate housing waiting lists and address the needs of others who suffer from the housing unaffordability crisis, including hidden households. It is important that the needed numbers of houses for social rent and other tenures which ensure the stock of affordable housing are maintained as such in perpetuity.

It is difficult to see how the (rural) exception sites policy would function in the context of the proposals for zoning. Assuming that land is specifically allocated for Growth and Renewal zones, then it follows that all exception sites coming forward would be within the Protected zones. The proposed approach to exception sites therefore implies that it is directly aimed at small sites within Protected zones, and that these would be prioritised for First Homes. This appears to give LPAs very limited control over the location and tenure for small development sites in Protected zones. Small-scale

social housing schemes on rural exception sites are a good way for the affordable housing needs in villages to be addressed.

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?

We are concerned about the impact of proposals to move all planning online for some of those from some of those defined as having protected characteristics as defined in section 149 of the Equality Act 2010. In particular these proposals are likely to adversely affect some due to their age and/or ability/disability.

Michael Rayner, CPRE Norfolk, Planning Campaigns Consultant

David Hook, Chair, Vision for Norfolk, CPRE Norfolk