

26 October 2020

Planning for the Future Consultation  
Planning Directorate  
3rd Floor  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

Dear Sirs

### **Planning for the Future White Paper Consultation Response**

North Norfolk recognises and supports the need for planning reform. This reform should be based on what matters to communities. The impacts of climate change, protecting our wildlife, delivering energy efficient and affordable homes which are built to better space and quality standards, and making sure that alongside new homes physical and social infrastructure is also provided are all important concerns. We agree that there is a need to streamline the process of how Local Plans are prepared and how to secure planning permission but this must be done whilst also improving community engagement and the influence that people have over developments in the areas where they live.

It is concerning that many of these important issues are hardly mentioned in the case made for change and the proposals themselves, rather than confronting the real issues, seek instead to focus on speed of decisions and deregulation. Most concerning is that this is proposed in ways which centralise and remove local controls over the impacts of development and, despite claims to the contrary, would seriously undermine community opportunities to be engaged meaningfully in the planning process and influence outcomes. This will erode, rather than foster, confidence and support for the planning system. For example, the proposals to digitise planning may help some but will limit access for many and are no substitute for 'conventional' engagement. To suggest that engagement at Local Plan preparation stage in relation to broad brush zonal approaches is an effective alternative to consultation on individual planning applications is disingenuous. Coupled with the proposals to introduce a new raft of Permissions in Principle these proposals will seriously undermine local democracy.

The central theme of the White Paper is that the planning system prevents or delays development and in particular the delivery of homes. This is not the case. The vast majority of planning applications are approved with little delay and each year planning permissions are granted for far more homes than are built. North Norfolk has routinely delivered more homes than its target over the past few years. Nothing is said in the consultation about using the available housing stock more efficiently or introducing controls over second home ownership which is blighting many rural communities and driving up house prices well beyond the means of local people. We urge government to take the opportunity to look again at introducing planning controls which allow local authorities to manage the impacts of second home ownership in their communities. A simple modification to the use Classes Order so that second home use requires planning permission would allow local authorities to develop local policy approaches to this issue.

The White Paper makes no mention of any requirement for local plans to pursue carbon emission reductions in line with the net zero target under the Climate Change Act, and is silent on how national and local climate targets will inform the new local plans and planning decisions under the new system. This is a huge concern - the next round of Local Plans will be critically important if the country is to address the climate change emergency.

The consultation states that under the new planning system homes will be “zero carbon ready” and capable of retrofitting. Building standards are a central component to achieving zero carbon homes and it is important that the government publishes its response to the Future Homes Consultation and its intended revisions to building standards. Action is required now not in the future and government should be more ambitious in driving up standards.

The White Paper rightly places more concentration on design and North Norfolk welcomes this. However, by focusing on appearance, the proposed design codes will influence how homes look, but not how they are built and how places will work. A focus on aesthetics and beauty is undoubtedly important, but a much broader approach to design including how zero carbon and climate adapted places function is required. Proposals to plant trees in every new street are eye catching but are merely window dressing given the scale of the challenge we face.

We have made detailed submissions on the individual proposals via completion of the consultation questionnaire (attached). We agree that reform is necessary and want to work positively with government to deliver sustainable growth but many of the proposals are unacceptable.

We urge government to think again, listen to the chorus of disapproval and grasp the opportunity to address the issues which people really care about.

Yours sincerely



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**Leader of the District Council**

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# Planning for the Future White Paper 2020

## Response on behalf of North Norfolk District Council

October 2020



On 6 August, 2020, Government published two separate consultation documents which seek views on significant and far reaching changes to the planning system. The '[Planning for the Future](#)' White Paper proposes significant reform, requiring a longer implementation period and transitional provisions. '[Changes to the current Planning System](#)' proposes a number of short term changes which could be implemented without the need for extensive reviews of primary legislation.

This paper provides the full North Norfolk District Council response to the '**Planning for the Future**' consultation. The responses are supported by a separate letter outlining the Council's broader concerns. Supporting information can be found at [www.north-norfolk.gov.uk/planningforthefuture](http://www.north-norfolk.gov.uk/planningforthefuture)

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### About You - Organisation

If you are responding as a professional or on behalf of an organisation, please select the option which best describes you or your organisation. (If a personal view, please go back to the previous question.) \*

- **Local Authorities** (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)
- Government / arms-length body
- Non-Governmental Organisation (NGO)
- Community group/Parish Council/Neighbourhood Forum
- Developer / construction
- Landowner
- Land agent / land promoter
- Architecture/Urban design
- Housing charity / campaign
- Housing association
- Business / trade body
- Planning / development consultancy
- Digital technology
- Infrastructure provider
- Other (please specify)

What is the name of your organisation? \* **North Norfolk District Council**

### About You - Region

What region of England are you located in?

- North East
- North West
- Yorkshire and The Humber
- East Midlands
- West Midlands
- **East of England**
- London
- South East
- South West
- Don't know/ Prefer not to say
- We operate nationwide
- If another country (please specify):

## Pillar One - Planning for Development

### Q1. What three words do you associate most with the planning system in England?

Answer 1 Democratic

Answer 2 Under-resourced

Answer 3 Localised

### Q2. Do you get involved with planning decisions in your local area?

- Yes
- No

#### Q2 (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):

*We are the Planning Authority*

### Q3. 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):

*North Norfolk objects strongly to the way that this question is framed. Far from making it easier to express views on planning decisions the proposals would significantly reduce the opportunity for communities and individuals to have a meaningful opportunity to influence developments in their areas. The proposals for 'enhanced' consultation at local plan preparation stage provide for the same engagement opportunities as is currently the case (perhaps via alternative methods) but would relate to the designation of broad zones rather than individual development proposals and coupled with the potential introduction of extensive Permissions in Principle would seriously undermine engagement and local democracy.*

*In relation to methods of engagement North Norfolk supports the use of digital engagement where this is appropriate but not at the expense of more traditional methods. Despite improvements in technology many continue to lack access to reliable broadband or mobile connectivity. Many rural areas are also home to a significantly higher than average older population many of whom do not wish or have the means to engage via digital platforms. It is therefore important that a range of methods are used, not purely digital.*

### Q4. What are your top three priorities for planning in your local area? (Please select only three answers)

- 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 / areas
- Other (please specify):

*It is not appropriate to seek to rank priorities in this way. The delivery of sustainable development would require all of these to be addressed.*

**Q5. Do you agree that Local Plans should be simplified in line with our proposals?**

- Yes
- No
- Not Sure

Please provide supporting statement:

*North Norfolk agrees that there is scope to simplify the 'process' of plan making but does not agree with proposals to simplify or reduce their 'content' and replace detailed local policy approaches with standardised national approaches.*

*We consider that the combined processes associated with evidence gathering, consideration of multiple options, and the associated Sustainability Appraisal process currently creates considerable burdens and delays and in many cases it is not clear what value is added to the resulting Plan. Current guidance that evidence should be 'proportionate' and that options considered should be 'reasonable' continues to create uncertainty, can be subject to interpretation and is often challenged so authorities tend to take a risk adverse approach. Leaving these issues to be considered until the end of the process at the final examination is also unhelp.*

*However, whilst taking time and resources these processes provide important safeguards and are required for good reason. Rather than remove the current tests government should consider measures to streamline them and clarify what is required to meet them. For example:*

- *A single standard, and simplified sustainability appraisal template could be produced which could include the requirements of Environmental Impact Assessment and a demonstration of how the plan contributed towards addressing climate change. This could be applied to the Plan as a whole rather than the current process of appraisal of individual policies, proposals and many options.*
- *Government could define more clearly the scope of supporting evidence which is required and limit this to a small number of key areas.*
- *The current process of considering multiple options could be reduced.*
- *The process of examination could be staged and on-going throughout Plan preparation rather than left to the end with authorities able to proceed in defined stages having passed previous stages.*

*Taken overall the bar which is set to meet the current legal and soundness tests is too high and creates too much scope for both failure at examination and subsequent challenge. Much could be done to simplify and streamline current processes without 'throwing out the baby with the bath water'.*

**Q6. 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, North Norfolk does not support this proposal, the development management policies included in Local Plans are critically important for ensuring that local factors can be properly taken into account when determining planning applications. It is already a requirement that such policies should not repeat national advice and should add local distinction. These policies are rarely the subject of any significant contention either during plan preparation or at examination and it is a straight forward matter for Inspectors to determine if they merely repeat national policy. A set of national development management policies are very unlikely to be sufficiently 'local' or detailed to adequately manage development at a local level. It is not clear what benefit the removal of such local policies would deliver.*

*Furthermore, by removing such policies from Local Plans and replacing them with national approaches such policies would sit outside of the statutory plan led scheme and beyond the provisions of Section 38(6) thus diminishing their weight in the decision making process.*

*An alternative approach would be for government to produce a set of model policies which local authorities could choose to use, or modify, for local use. Such model policies should continue to comprise part of the development plan but need not be the subject of examination.*

**Q7(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:

*North Norfolk would support the streamlining of the legal and soundness tests to a single sustainable development test provided such a test fully addressed the requirements of Strategic Environmental Impact Assessment and included a requirement to demonstrate that the Plan positively addressed the impacts of climate change.*

*It is not clear how compliance with such a test would be measured given elsewhere in the consultation it is indicated that the process of Sustainability Appraisal would be removed. If introduced, government should publish a standardised framework for how such a test would be complied with limiting it to an assessment of the entire plan rather than to each separate policy and proposal.*

**Q7(b) How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?**

*North Norfolk supports the current Duty to co-operate and considers that it provides a reasonable and proportionate vehicle for co-operating in relation to strategic cross boundary considerations. However, the Council does not consider that it is necessary for the duty to be subject to a 'legal' test for it to be effective, a simple requirement in the plan making regulations to address strategic cross boundary considerations would be sufficient.*

**Q8(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:

*North Norfolk does not object in principle to government providing a standardised approach as a 'starting point' for calculating how many homes might be required in any area but it objects strongly to the current standard methodology. Any standardised approach at a national level must allow for the consideration of local evidence and for departures from the standard approach to be justified. The suggested standardised method produces a new homes requirement in North Norfolk which is 70% higher than the demographic evidence suggests is necessary. North Norfolk objects to this approach because it is not evidence based, produces a result which is not considered deliverable, and is likely to result in unsustainable developments. There is no evidence that such a requirement would assist in the delivery of much needed affordable homes.*

*Any standardised approach must consider both the requirement for new homes and the consequences and impacts locally of how this number will be met. The current demand led methodology merely perpetuates previous trends without considering the potentially negative impacts of such trends continuing. Constraints which should be taken into account in deciding a housing target should be much wider than a mechanistic consideration of environmental designations such as green belt and AONB and should allow for consideration of the full range of factors which influence an areas ability (capacity) to deliver genuinely sustainable growth. These decisions are best made locally, not nationally, and tested via an examination process.*

*It is regrettable that government indicates that it is considering how issues relating to constraints could be considered in any revised methodology but has not published details alongside this consultation, effectively seeking views on half of the potential approach. Furthermore, the proposal is that how constraint is to be taken into account will be a matter for government, not local decision makers, it will not be subject to examination or scrutiny, and it will be imposed and binding. It is difficult to envision how government could complete anything other than the crudest assessment of local constraint and how this might impact on an areas ability to accommodate sustainable growth.*

*The consultation accepts that constraint must be taken into account but removes this assessment from local to a national level. An alternative would be for government to indicated those factors which could be accepted as legitimate constraints and the extent to which they should be factored into the final number. Ultimately, the Council considers that this is a decision which must be made locally, it should be open to local debate and scrutiny, and subject to an examination process which gives all stakeholders the opportunity to present a case.*

*As currently proposed the methodology will lead to the failure of many, if not most, Local Plans and is essentially a dismantling of the plan led system.*

**Q8. (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, whilst local affordability and extent of urban areas might be useful indicators of need and capacity, neither are the sole measures of likely levels of future demand for homes or the factors which may impact on the ability to address that need in a sustainable way. Affordability issues in areas like North Norfolk will not be addressed simply by building more and more homes. In attractive rural areas such as North Norfolk where the housing market is driven by inward migration of retirees building more homes is unlikely to have much impact on affordability. Rather than focus on building greater quantities of homes the emphasis should be on building more of the right type of affordable homes to address local needs.*

*The consultation is silent on the issue of second home ownership which is blighting many rural communities. Government should take this opportunity to introduce planning controls over the use of*

*properties as second homes and allow local authorities to develop locally specific policies to manage this issue.*

**Q9(a). Do you agree that there should be automatic permission in principle for areas for substantial development (Growth areas) with faster routes for detailed consent?**

- Yes
- **No**
- Not Sure

Please provide supporting statement:

*North Norfolk does not support the further extension of Permissions in Principle. PiPs do not provide an appropriate mechanism to manage the impacts of development or allow for local democratic engagement in the planning process. It is simply wrong to suggest that such issues will be adequately addressed at Local Plan preparation stage when such Plans would be proposing broad land use designations (zones) rather than considering specific development proposals.*

*The existing process of securing outline planning permission allows for the proper consideration of the principle impacts of development at a site specific level rather than across large geographic zones and is the stage in the process which allows for meaningful engagement and a vehicle for mitigating the impacts of development via the imposition of appropriate conditions and completion of legal agreements. Permissions in Principle do not allow for this and do not provide the degree of certainty that communities, and developers, require. For these reason, North Norfolk would strongly object to any further significant extension of PiPs.*

*If Local Plans are to become the vehicle for granting what is essentially the Outline Planning permission they will require substantial new resource and the work involved will result in very substantial delays in Plan preparation.*

**Q9(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:

*North Norfolk would not support the extension of PiPs to Renewal Areas for the reasons outlined in response to Q9.*

**Q9(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:

*Such decisions should be made locally. The proposals run counter to local democracy and community engagement.*

**Q10. Do you agree with our proposals to make decision-making faster and more certain?**

- Yes
- No
- **Not Sure**

Please provide supporting statement:

North Norfolk considers that there is some scope to increase the speed of decision. However, decisions that require judgements to be made are inherently less certain than those which rely on compliance with non-judgemental criteria. Proposals to reduce planning decisions to a tick box exercise misunderstand the nature of the decision making process and are far too simplistic.

**Q11. Do you agree with our proposals for digitised, web-based Local Plans?**

- Yes
- **No**
- Not Sure

Please provide supporting statement:

*Making Local Plans shorter and more comprehensible is helpful as is inter-active mapping. North Norfolk does not object to the use of digital platforms and web based local plans but we would not wish to be constrained by a fixed templated approach, would require significant additional resources, and would not wish to see digital 'only' approaches. Despite improvements in technology it remains the case that many stakeholders in the planning process find web based digital options difficult to access and unresponsive to their particular needs. Local Authorities should continue to be able to produce, publicise and engage with their communities in the best ways to meet their needs.*

*The Council would not support proposals which prescribed one particular approach and excluded others.*

**Q12. 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:

*A 30 month period is far too short and does not allow for the enhanced engagement suggested, preparation of Pips, and production of master Plans and guides which are suggested in the consultation.*

**Q13. (a) Do you agree that Neighbourhood Plans should be retained in the reformed planning system?**

- **Yes**
- No
- Not Sure

*North Norfolk strongly supports the preparation of Neighbourhood Plans.*

**Q13 (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?**

*Neighbourhood Planning should be resourced so communities in all rural areas are able to take up the opportunity for all members of their community to engage in shaping their community.*

**Q14. 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, North Norfolk would support measures to improve build out rates*

*There is currently very little incentive or penalties attached when approved developments are not built. The main penalty that exists falls on Local Planning Authorities and communities which are required to respond to slow development rates by releasing further land for development. The performance of planning authorities should be judged on planning permissions granted and sites allocated for development rather than number of homes built. Construction rates are largely outside of the control of planning authorities and are mainly determined by market factors, the dominance of a few volume house builders and the lack of diversity in the product being built as identified by the Letwyn Review.*

## Pillar Two - Planning for Beautiful and Sustainable Places

### Q15. What do you think about new development that has happened recently in your area?

- Not sure / indifferent
- Beautiful / well-designed
- Ugly / poorly-designed
- There hasn't been any
- **Other** (please specify):

*North Norfolk is disappointed in the standardised house types on offer by most volume house builders who appear unwilling to move away from 'types' of dwellings which are repeated irrespective of site location and contexts.*

### Q16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

- Less reliance on cars
- More green / open spaces
- Energy efficiency of new buildings
- More trees
- **Other** (please specify):

*It is not clear how sustainability is at the heart of these proposals. All of the above are important and necessary to deliver sustainable growth. Rather than focusing on sustainable planning outcomes the White Paper seems more concerned with the speed of decision, quantity of homes built, and removing current regulatory controls, including Sustainability Appraisals, which are essential to ensure the quality of development and proper local engagement and scrutiny.*

### Q17. 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:

*The Council is supportive of the increased use of design codes and guides particularly where these are locally produced but would have the following concerns.*

*The appearance, or 'beauty' of a development is both subjective and a narrow aspect of successful design. We would be concerned that the proposals place too much emphasis on appearance and we would object to any reliance on templated 'pattern book' solutions which fail to take account of local circumstances. It should be an explicit requirement that like the current national design guidance, Local Design Guides are not just about aesthetics, but also include consideration of all of the ten characteristics that make for a well-designed place. (context, identity, built form, movement, nature, public space, Uses, homes and buildings, resources and lifespan)*

*Design guides and codes are most effective where they contain clear design principles supported by examples rather than determine specific outcomes. The experience of national codes, such as the Manual for Streets, is that they result in formulaic identikit solutions which fail to adequately reflect local context and character. Any new approach should make clear that locally produced guidance will take precedence over national Guides and Codes.*

*Climate Change resilience and adaption should be at the heart of any new design codes and these could provide a vehicle for mandating enhanced space and building construction standards.*

**Q18. 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:

*Providing access to expert design advice is helpful, but it will be important to ensure this is available for all scales of development and support community generated design guides.*

*Improving resources for Local Planning Authorities is helpful, particularly for small rural Local Authorities. Will need to include more than design/community engagement/development skills. The skills required to bring forward housing that meets the Government's ambition are not just planning. The Planning White Paper makes no reference to housing enabling with LAs. They are critical to bringing the right partners to the table, negotiating with developers, securing non-Homes England finance etc.*

*Whilst it is important that LA's have in house design skills it is not clear why this would need to be at Chief Officer level and if this were to be the case resources would need to be provided.*

**Q19. 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:

**Q20. Do you agree with our proposals for implementing a fast-track for beauty?**

- Yes
- No
- Not Sure

Please provide supporting statement:

*There is no reason why a single issue such as the appearance of a development should lead to a quicker decision. The emphasis should be on the proper consideration of all issues in an efficient way. The idea that beautiful development will always be acceptable and therefore should be approved quickly fails to understand the complexity of the planning process. Most well designed proposals which meet policy requirements are approved quickly with little delay.*

## Pillar Three - Planning for Infrastructure and Connected Places

**Q21. 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)
- Design of new buildings
- More shops and/or employment space
- Green space
- Don't know
- Other (please specify):

As elsewhere in this questionnaire these types of choices are artificial as all of the above considerations and others will be important

**Q22. (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:

*North Norfolk favours the retention of the Section 106 process albeit its operation could be improved. The Council is concerned that any tariff based system results in the payment of financial contributions rather than the direct provision of infrastructure and runs the risk that the direct link between the development and the infrastructure to support it being broken. Tariff systems also run the risks of delaying infrastructure provision, or infrastructure being provided in locations unrelated to the development and the 'hosting' community.*

*It is very concerning that the consultation suggests that the provision of affordable housing may be covered by tariff payments resulting in financial contributions rather than direct on site delivery. It would also mean that affordable homes might need to compete for funding alongside other infrastructure priorities. Affordable housing should remain outside of any tariff system and should continue to be delivered on site as part of the development proposal.*

*If a consolidated national tariff is introduced:*

- *The IL rate should be set by local authorities to take into account local housing markets. There should also be a requirement for a proportion of the IL to be ring-fenced for affordable housing. The proportion should be set locally and be sufficient to fund the affordable housing requirement set out in Local Plan policies and design guides.*
- *Affordable housing should be exempt from Infrastructure Levy, as should any housing provision on rural exception sites or community led housing sites where this is providing the cross-subsidy that makes a scheme economically viable.*

*Section 106 Agreements should be retained to secure:*

- *the perpetuity of the affordable housing and local occupancy requirements of rural exception sites; and,*
- *other community benefits that ensure the scheme contributes to a beautiful and sustainable place.*

*Clarity is required across a number of issues, including:*

- *Whether there would be every incentive for developer to dip under the threshold? This is more likely to happen on small scale development sites such as rural sites*
- *There is no indication of the minimum threshold level. If this is set too high, then smaller developments will not have to pay and therefore may not provide any affordable housing on*

these sites.

• What will happen if the income/value of the scheme goes up or down. Equally, what happens if at point of occupation (sales completed) the income is lower or higher than the value on which IL was valued? How will the upfront infrastructure costs be paid for? If, as proposed LAs use their borrowing to support these costs their loan funding will not be available for other provision e.g. housing renewal/capital investment in other LA owned assets and affordable housing.

**Q22. (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**

**Q22. (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:

*The current process (either Section 106 or CIL) places too much reliance on residual valuations and viability assessments which allow both the land owner and the developer to benefit substantially from the uplift in land value created by the grant of planning permission. Any new system should result in a more equitable distribution of this uplift and aim to capture more of this value for local communities. In this way the system will be seen to work in the 'public interest' rather than for the benefit of a few individuals.*

*Government should make it explicitly clear and binding that land value is to be determined by the value of land with a fully policy compliant planning permission, not by market expectations and that obligations entered into are not renegotiable.*

**Q22. (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:

**Q23. 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:

*Developments allowed as Permitted Development will often introduce new burdens on supporting infrastructure and therefore they should contribute towards the provision of this infrastructure in the same way as other development proposals. If tariff systems are to be introduced these should be levelled across all development proposals which impact on the need for supporting infrastructure.*

**Q24. (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:

*Any proposal should aim to deliver more, not the same. There is already a desperate shortage of affordable homes. This Planning White Paper and the Changes to Planning consultation include proposals which would negatively impact on Authorities ability to secure genuinely affordable homes. Raising site size thresholds, introducing more expensive products into the definition of affordable homes, and allowing for development viability to be reviewed, all directly impact on the Councils ability to address community needs and reflect local circumstances.*

**Q24. (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:

*Yes, but only if such mechanisms relate solely to additional affordable homes provided on top of what local policies require. Such in kind contributions should not be made instead of, or at the direct expense of, on site provision.*

**Q24. (c) If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?**

- **Yes**
- No
- Not Sure

**Q24. (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:

*Affordable homes offered as in kind payments for levy contributions should meet defined quality standards and Local Authorities should always retain the right to decide whether to accept such contributions irrespective of compliance with scheme standards. These are decisions which should be made locally.*

**Q25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?**

- Yes
- No
- **Not Sure**

Please provide supporting statement:

*North Norfolk supports the strong link between development and the provision of infrastructure to support that development. Levy receipts should be limited to expenditure on Infrastructure associated with specific development proposals.*

**Q25 (a) If 'yes', should an affordable housing 'ring-fence' be developed?**

- **Yes**
- No

- Not Sure

Please provide supporting statement:

*North Norfolk does not support the collection of levy contributions for affordable housing as a substitute for direct on site provision. If a levy system is introduced it is essential that sufficient is ring-fenced to deliver policy compliant amounts of affordable homes (of the right types to address local needs).*

## **Equalities Impact**

**Q26. 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?**

- Yes
- No
- Not Sure

Please provide supporting statement

Why has there been no Equalities Impact Assessment provided with the PWP?

## **Final Question**

**Have you responded to a Government consultation before?**

- Yes
- No