

Monday, 12 October 2020

We, the Steering Group of the Village Concerns Action Group, represent the views of over 200 supporters from our Community. Village Concerns is an Action Group campaigning to protect the character and ambience of the Parish of East Hoathly with Halland in East Sussex. It endeavours to ensure that development in the Parish is sustainable. It aims to monitor housing proposals and galvanise the community to either endorse beneficial developments or challenge those that are unsustainable.

1. We wish to respond to the Planning White Paper Consultation. You ask that responders should identify the Question to which they are responding when making comments. We object to the phrasing of the Questions which have been selected and phrased to reinforce the intent of the White Paper. In this sense they are not an open and genuine attempt to consult on the subject of the White Paper but merely to seek support for the choices you already seem to have made.
2. The Planning White Paper contains many phrases that sound as if they make sense and would provide a better planning system and there is no doubt that the current system is broken. However, the White Paper fails to acknowledge that the most significant problem with planning is the rapacious greed of developers and landowners who's only intent is to maximise their profits using flaws in the system and have no interest in building the right homes in the right places.
3. The whole basis of the National Policy Planning Framework is that development should be sustainable. Yet, the existing system pays lip service to sustainability and planning authorities permit development in places without infrastructure, jobs or services to sustain the new homes. Most new development is car dependant whereas reducing car dependancy should be at the very heart of planning policy. The government will only really tackle the Climate Emergency by reducing car dependancy.

4. In the Prime Ministers Forward to the White Paper he states “And, above all, that gives the people of this country the homes we need in the places we want to live at prices we can afford, so that all of us are free to live where we can connect our talents with opportunity.” This glossy phrase misses that point entirely. Where we want to live is irrelevant, we need to live where our job takes us and where the facilities exist to sustain us. The golden mantra of any planning system should be to limit the need for car dependancy. This may help the government meet its Climate Change targets and avoid the now widely acknowledged Climate Emergency that so many local authorities are now heralding whilst at the same time ignoring by granting permissions for car dependant housing estates miles from the jobs and services they need. Any new planning system should not grant permission to build a single new home unless:

Employment is available and accessible by public transport or new employment opportunities are being built as part of the same development.

The location is genuinely sustainable without the need for car journeys of more than 5 Kilometres.

5. You propose enforcement powers and sanctions to get development done but ignore the damage that this would do. Developers currently breach planning rules and the existing enforcement powers are either wilfully not used or are ineffectual. Existing sanctions, such as the easing of restrictions if there is no 5 Year Land Supply have the effect of allowing developers to build even more houses where there are no jobs or facilities. Your proposed new sanctions would most likely make this worse allowing developers to do more damage and then just walk away. The Local Government Association published data in February 2020 indicating that developers had planning permissions for 1,033,920 new homes but with very little intention to build them until they could maximise profits. The government allowing them a guaranteed 20% profit margin. The situation is self evident, you have created a planning system that is in favour of developers, they abuse the cracks in the system and have total control of the house building market and the planning system. Because they won't build your invented target of 300,000 homes per year you have drafted a white paper that will give them even more power. This will give them an even larger land bank and they will still only build when the profits are right.

## **Consultation Document Questions**

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

1. Broken, corrupt, biased - all in favour of greedy landowners and developers.

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

- 2(b). If no, why not?  
[Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

2. Yes.

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]

3. Planning is too complex to change the essence of the existing system. It requires detailed plans and paperwork in order to be able to make rational decisions. To degrade the system to something that could be presented on a smartphone or social media may be attractive to the younger generation but it will result in important decisions being made without understanding the whole of the issue. It is currently possible to access plans and contribute views quite easily, the problem is that those views are ignored and the decisions are made in favour of the greedy developers.

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]

4. Other - Nothing in your priorities list mentions building the right homes in the right place - in other words SUSTAINABILITY. This is the only point of the NPPF. It is no use building the most ecological, affordable house for all

the young, homeless, disadvantaged people if you build it where there are no jobs, infrastructure or services to support them and no plan to provide it.

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

5. No. See the comments above. The proposals will not improve Sustainability. They will squeeze all planning decisions into the Local Plan making process, remove public scrutiny and allow a massive increase in unsustainable development. They will see an increase in car dependency and exacerbate the Climate Emergency.

**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.]**

6. No. This is unimportant compared to the other elements of your proposal. The NPPF and any repetition in Local Plans and Design Guides could be simplified but that is not the problem. The problem is that the planning system ignores the NPPF. The Government set unnecessary housing targets that force local authorities to capitulate to developers and permit unsustainable development that is in clear breach of the NPPF and Local Plans. If a local authority fails to meet the housing targets and cannot provide a 5 Year Land Supply, they are punished by creating an “open season” with developers being allowed to force through even more unsustainable development in unsuitable locations. Most homes built under the “5 Year Land Supply gap” are totally disconnected from any strategic planning. This results in huge amounts of housing being placed miles away from jobs, schools, shops, public transport and everything that sustains them. Solve the important problem first and then worry about repetition of the NPPF in Design Guides and Local Plans.

**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.]**

7(a). No. It is such a shame that having finally decided to address sustainability in your White Paper you then completely misunderstand it. You propose a sustainability test yet provide no details. Your proposal is simplistic and is like asking someone if they would like a bar of chocolate. It is a self serving question. How can you decide if the new proposal would be better if there are no details of the new system. The existing NPPF have

plenty of words that enshrine sustainability at the heart of the planning system. As argued in the answer to Question 6, the problem is that the unachievable government targets and punitive system if they are not reached forces the planning authorities to ignore the NPPF. The proposed new Sustainability Test will be worthless if it can be overridden when the Government invents another unachievable housing target.

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

7(b). Your proposal to abolish the Duty to Cooperate. The Duty to Cooperate is an important issue and it applies to matters far more wide reaching than the planning system. You cannot remove it without a detailed plan for its replacement. It is therefore wrong to consult on it without any detailed alternative. It is bizarre that in a Planning White Paper you are asking the public to come up with ideas for such an important issue but putting forward no ideas of your own. Cross boundary issues will never be solved by cooperation unless there is the threat of a higher authority making decisions for them. As far as I understand, this is currently the task of the Planning Inspectorate when plans are scrutinised. I see no reason why boundary disputes could not be separated from Local Plan scrutiny and addressed by the Planning Inspectorate separately and in a much quicker timescale. Alternatively you could get the MP for the disputed boundary to determine the outcome. It would be good for them to get their hands into issues that really matter to their constituents. If the boundary was between 2 different MPs constituencies then appoint another MP from a different party to adjudicate.

**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.]**

8(a). No.

The proposed standard method is a self serving algorithm to produce a target invented by the Government to build 300,000 homes per year. The Introduction to the White Paper talks about wanting to base decisions on data and not documents. In very crude terms data is a list of figures, documents are what can be used to explain the data and give it meaning. Both are needed and to suggest that one can replace the other is simplistic and a smokescreen for the real faults in the system. Data is usually determined through science or fact gathering but it can also be invented. The government make constant reference to their target of building 300,000 homes per year. That is a piece of data but it is a piece of invented data. It was a political invention that

came from a manifesto document. It came with no scientific basis, no analysis and there remains no proof that it is what is needed in this country and much more importantly where the housing is needed. You have created an algorithm to calculate new Housing Targets that contains an Affordability Factor which is another invented piece of data that allows the target of 300,000 to magically pop out.

If you look at a map of all the areas of the country where land is protected by being AONB, SSSI, National Parks, Green Belt or Ancient Woodland then it shows where you should be directing future development. The one clear result of this of this exercise is that it is obvious that the South East has the least capacity to cope with more housing. The centre of England is clearly the place with the capacity to expand, the Oxford to Cambridge Arc and further to the North and North East.

**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.]**

8(b). No.

The concept of forcing housebuilding on land where affordability is worst makes no sense. This is looking at housebuilding solely as an economic benefit. The first question should always be is there a need to build homes in this location. Are there jobs and services for the residents. Affordability does not mean that housing is needed, it just means that it is an attractive place to live. This may be because it is very beautiful, has a great character or fantastic local facilities. It does not mean that there are any jobs or that the existing infrastructure and facilities have the capacity to cope with more homes. Affordability may be at its worst in Mayfair or on a Dorset clifftop but it makes no sense to build affordable housing in those locations because they would not be sustainable. It is the invented housing targets that are the problem. Affordability is driven by the attractiveness of the location as a place to live.

Densification is a horrible word and you should think very carefully before suggesting the families are put into Densification Housing. However, the current system of building tiny homes in sprawling estates is very poor. Better solutions for urban housing are needed but this does not apply to rural areas where housing densities do not

match the more spread out historic pattern of development. Most new developments in rural environments follow the pattern of urban centres, they do not match the existing layouts and have become a blight on the heritage of rural villages. You need to understand that affordability is about desirability not sustainability. If you build on top of all the desirable places they will no longer be desirable and you will have buried all the attractive, desirable places with unsustainable housing full of people commuting for hours to get to their jobs.

You propose to include a buffer to account for the difference between permissions and completions. This is one of the worst ideas in the whole White Paper. The developers have a huge land bank already and this will just make it fatter and allow them to continue to control the market and the planning system. A buffer will just add more land that is blighted with a planning consent that may never see any development. Why not force developers to complete on their permissions with no extensions. If they do not complete on a permission you should also fine them with the fine going to the local communities who have suffered the planning blight. This might make them think more deeply about the deliverability of the project whereas at present they do not care about the impact of their schemes on local communities.

You propose to maintain the Housing Delivery Test and the presumption in favour of sustainable development but do nothing to acknowledge that these are at the heart of the flaws in the current system. The current punitive system should be renamed as presumption in favour of development because there is nothing sustainable in the housing that is forced through the planning system when a local authority fails to meet its 5 Year Land Supply target.

You allude to a new method for assessing local housing need. The algorithm you have invented has already been shown to produce another ridiculous housing target that bears no relation to real need. It is another self serving question such as do you like chocolate. Yes we all want a new home and one for each of our children and a retirement home for mum and dad and a care home and we want all of these in a really pretty village or by the sea and of course we want to be able to get to our jobs by hoverboard in 5 minutes after our children have walked to the local school - this fantasy does not translate to housing need. It is a wonderful aspiration but not a need. The only need is for housing linked to jobs - no jobs, don't build.

**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.]**

**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.]**

9(a) and 9(b). No. The new concept of zoning land as either Growth, Renewal and Protected sounds simple but it will have the effect of putting the whole of the decision process into the Plan Making period. The proposals suggest that this somehow democratises the public involvement. This is ridiculous. A member of the public or a local community may have a view about the prospect of a housing proposal for a specific field close to them and be willing to fight to save it but the idea that their voice will be heard as part of any consultation in the preparation of a Local Plan is ridiculous. Village Concerns takes part in Local Plan consultations and Planning Inspectorate proceedings. When we sit in the meetings and procedures our voice has not been heard above the legal jargon of the barristers and consultants. Your proposed changes will be the opposite of democratic.

**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.]**

9(c). New settlements are a good idea if they provide the right infrastructure, transport links and the right balance of employment to housing.

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

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

10. No. This may be well intentioned but it misses the point. The existing system is bureaucratic and complex because it is relentlessly in favour of developers. A developer can appeal any decision that does not go its way. A local community can only pursue the very expensive Judicial Review and this relies on the law having been broken or a highly unlikely Secretary of State call-in. This is unfair, undemocratic and the epitome of poor Localism. Allow appeals for all or none. You seem to be obsessed with quicker decisions. What is needed are better decisions not quicker ones.

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

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



11. No. Web based proposals should be an addition to the existing system. Not everyone has access to the Web and the visual and map based future you envision can only ever form part of the planning issues.

Planning decisions cannot be reduced to a picture. Your proposal to digitise the whole process is very fresh and forward thinking but it is not credible. The existing system is very creaky and where it uses digital services it often falls down or is misused.

The Covid restrictions have pushed planning onto virtual platforms and the result has been a significant exclusion of the public from the process and some unacceptable decisions being made by planning authorities failing to adapt to a very small and simple exposure to the digital world. Most Local Authority Councillors are elderly and many are not as able to adapt to the the digital world. Part of your reasoning is that because the current system is complex and uses large documents that people therefore choose not to get involved. You seem to suggest that this will be replaced with some form of “visual information” to which they will be able to respond on a smart phone. Whether you envisage something more sophisticated than a simple “Like/Don’t Like” response is not known but the implication is that this simple process could result in a change to a development plan if, for example, sufficient members of the public “disliked” the visual information. Really ? We have just been part of a planning process where almost 1000 objections were submitted to an application and it had substantial objections from Historic England and many other bodies and consultants yet was approved. How many White Paper writers does it take to change a light bulb and how many “swipes right” does it take to change a planning policy ? The point is that some members of the public do get involved despite the size of the documents because they care about their communities. Developers do not care about our communities, climate change or the environment, they only care about money. Your proposals would make it easier to ignore the public and open the door yet wider for developers.

**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.]**

12. No. It is too easy to say that the preparations of Local Plans takes too long. This is not generally because Local Councils are lazy or inefficient it is because it is a complex task driven by unrealistic government housing targets and has to comply with a huge amount of government legislation and often intractable negotiations with bordering authorities and bodies such as

Natural England whose decisions are often arbitrary and at odds with the protection of the Natural Environment. To impose short timescales and penalties on such a system will not produce a better outcome. First you need to change the legislation to which they have to comply, reduce your crazy housing targets and provide a better system to arbitrate over cross boundary and inter agency disagreements.

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

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

13(a). Yes. However, this Government created the Localism Act and has then effectively ignored it by not allowing Neighbourhood Development Plans to have any real teeth. If the Government believe that Neighbourhood Development Plans are a good idea they should have more power and be fully funded by central government. The proposals for the new Infrastructure Levy must preserve the proportion of the new Levy that would previously have been allocated to Parish or Town Councils to enable them to fund their own infrastructure improvements. The experience of local authority CIL expenditure is that it all goes onto major projects and is massively under funded. It is therefore vital that parishes get the same proportionate share of any new Infrastructure Levy. Also, the uplift from 15% to 25% in CIL payments to a Parish or Town Council was the main reason that most would have ever considered producing a Neighbourhood Development Plan. It is therefore vital that this same uplift is retained.

**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?**

13(b). If you want Neighbourhood Plans to be produced using digital tools you will have to fund equipment and training for parishes. You will need to fund in full the preparation of Neighbourhood Plans. If all you want to get out of Neighbourhood Plans is “community preferences on design” you might as well not bother. Developers very rarely care about design, their first interest is always maximising profit. They only ever listen to community interests if it is a way of buying compliance with a project. If Neighbourhood Plans have no teeth then the Developers will ignore them. Developers frequently ignore the stipulations of the local planning authorities in matters of design and materials but these breaches of planning consents and building control regulations are rarely addressed or enforced. You need to address the efficiency of the enforcement system first because at present you only force more houses to be built with no regard for the design quality nor if the “design” is actually delivered.

**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.]

14. No. The speed of the build out should be a local decision. If homes are needed in a community their delivery will be required over a given timescale. It may be short and immediate but it is more likely to be over a longer period. This may be to allow infrastructure to be put in place prior to the housing. It may be to allow employment opportunities to grow alongside the increasing workforce. It may be to allow a new school or doctors to be built and then develop as the community grows. In rural locations the sudden influx of a huge new housing estate can be devastating to the existing harmony of a village. It is much better to have a staged development over the period of a Local Plan so that communities are able to integrate and adapt in a harmonious way.

**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]

15. Our rural community had 2 new housing estates built 10 years ago that increased the size of the village by 25%. Some aspects of the design are good, some are very poor. There is inadequate parking and the roads are too narrow. The design of many of the properties is good but the quality of some of the materials and build quality ruins the design. The drainage plan for the site sounded very clever and effective but it now floods a nearby footpath and the Swales are already silted up and in need of expensive maintenance. Some affordable housing was built but most of it was allocated to people relocated from distant urban communities who have found the rural isolation uncomfortable. They do not understand or fit into rural life.

**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]

16. We do not believe that sustainability has ever been at the heart of your proposals. If it was, car dependancy would make you build less and build in urban centres with good transport links at higher densities. As it is you force local authorities to build on green fields, on our open spaces and on top of ancient hedgerows and woodlands. These rural developments are all totally car dependant because the majority have very little local employment, very limited local facilities and more importantly no capacity to take on extra housing to load onto their local employers and facilities. So, our priority is

not for less reliance on cars but to build nothing where the development is car dependant - see Paragraph 4 above.

New homes are generally only built to meet the minimum requirements of the current building regulations which are not as energy efficient as they need to be to tackle the Climate Emergency. All new homes should require: An electric vehicle charging point. Charging Points for visitors. Inbuilt solar energy systems and Air/Ground Source Heat Pumps. The design and alignment of the homes should maximise solar gain and heat recovery. Greywater storage systems should be built into designs. None of this is currently mandatory in Building Regulations or National Guidance.

Sustainability is already a binary issue. Local authorities make an assessment of a town or village based on its facilities such as schools, doctors, dentists, shops, pubs, playing fields and other facilities. They should also take into account local employment opportunities and the existence of effective public transport to get to facilities further away. The whole point being that the community should be able to sustain itself and not require a constant mass exodus in cars to get to the jobs and services that are needed for daily life. The flaw in this system is that it takes no account of capacity. A local school may provide sustainability for existing local residents but if it is already full and has no space or plans to expand then it cannot sustain any new residents. Once Sustainability/Unsustainability is determined it is assumed by the planning system to be fixed. However, if a village is designated as Sustainable and then things change such as the pub closes, the local school becomes full, sites of employment are turned into housing developments, then the village is still deemed to be Sustainable and will be forced to have further housing. Your proposal will make the designation of an area as Sustainable even more binary and damaging.

**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.]**

17. Not sure. Design guides are only important if you build homes that are needed in the right place. If you continue to build unwanted development in the wrong unsustainable places that are totally car dependant then it does not really matter if they are well designed.

**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.]**

18. Not sure. This may not be necessary. Existing planning departments should be capable of this - it is already part of their training. The problem is that they are incapable of thinking about “place making” because they are on the constant treadmill of trying and failing to deliver central governments ridiculous housing targets. Why would a planning officer try and add a village green, duck pond and a village store to a development when he could allow the developer to squeeze in 30 more houses that would add to his 5 Year Land Supply target ? Would a Chief Officer for Design and Place Making have any teeth ?

**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.]**

19. Not sure. My comments on Question 18 apply.

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

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

20. No. Your determination to build more homes faster is misjudged. It will not help communities to evolve and grow, it will devastate them. Your concept of a “Fast-Track for Beauty” will not be achieved. It pushes all the decisions on development into the Local Plan process which you want to make shorter and simpler. At some stage the planning authority need to properly examine the complexities of proposed development and the impact it has on the climate, environment, employment, local resources and services and also on local communities. One example of how this will fail is that if a current planning application cannot show safe access to the proposed site then, quite rightly, it will not get outline planning consent. You propose to zone areas for Growth with guaranteed outline planning consent but with no examination of the site access. To simplify and condense this very complex issue could only be done by excluding the input and objections of the public and other interested parties or by ignoring them. If the local authority put forward a piece of land for Growth and this is strongly opposed but it is subsequently adopted into a new Local Plan how does a community challenge such a decision ? Where is the right of Appeal or of Judicial Review. We fully understand it must be very irritating to have people who object to your plans to concrete over the countryside but they should have the right to have development matters examined fully, openly and without prejudice. At present the system is already skewed in favour of developers. Your proposals would make it much worse.

Proposals 16, 17 and 18. You ask no questions in relation to Proposals 16, 17 and 18. Nevertheless, we offer three examples of how the existing system is woefully inadequate in relation to these Proposals.

Historic England can object to a proposed development on the grounds of Harm to Heritage Assets. The local authority can ignore this objection on the grounds that the public benefit of adding homes to an unmet 5 Year Land Supply Target override the Harm that will be caused to the Heritage Assets. The unachievable housing targets force local authorities into a 5 Year Land Supply deficit and the shoddy new homes will then blight the Heritage Assets forever.

You talk about protecting trees but local authorities already fail to do this. They will only impose Tree Preservation Orders when a tree is under imminent danger. A significant tree is deserving of protection all the time. If you wait until a planning application is approved (which is the only point at which local authorities consider the danger to be important enough to even consider) then it is often too late and the landowner will have already removed trees and hedgerows that he knows would have been problematic.

Climate Change is the biggest issue humanity has to face. It is bigger than Covid, Brexit and the Economy. It will kill us all if we carry on as we are. All governments have avoided dealing with it and despite ambitious announcements of things they want to achieve by 2050 this country is still building homes that use fossil fuels to heat and power them, are energy inefficient, are in locations where they are car dependant and do not have electric vehicle charging points built in. You could change this immediately in a single piece of Climate Emergency legislation and it would go some way to achieving your targets.

**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]**

21. This is a question that is premised on an acceptance that development has to happen. Your idea of development is thousands of new homes in a mistaken belief that it will stimulate the economy. When members of the public answer such a question they do so from a perspective of small developments that are in scale with the existing community, spread over time and the kind of housing the community needs, not what the developers want. In a car dependant rural village the priority may be that the village

does not need any more luxury homes with 4 or more bedrooms yet that is all the developers want to build. It may be that all the local community needs is a Community Land Trust development to provide low cost rentals for local agricultural workers or retirement accommodation for locals who need to downsize. Greedy landowners and developers know this but never offer up land to facilitate this. If they ever consider such projects it is only with a significant amount of unwanted luxury housing to ensure they still make millions from the deal.

**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.]**

**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.]**

22(a) (b) and (c). We don't care how the money is collected or how the rates are set. There are two things that matter:

That parishes should still get their share and that there should be an Infrastructure Levy boost for those parishes that create Neighbourhood Development Plans.

The rates set should be high enough to fund all the infrastructure costs, locally to the development and more widely if road, bus or rail improvements are required.

22(d). No. This is a really bad idea. To allow Local Authorities to borrow against the Infrastructure Levy would be very dangerous. It would create more debt in the Local Authority and a loop where permitting more and more development would be the only way to service the debt. That is not a sensible fiscal policy and is morally dubious. The existing CIL system is already caught in this trap with infrastructure needs outstripping CIL receipts. The only way you should fund infrastructure expenditure is by much higher developer contributions or taxation. Borrowing against the Infrastructure Levy would create a system where you are building homes to feed your “addiction” not because they are needed.

**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.]**

23. Not sure.

**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.]**

**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.]**

**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.]**

24 (a) (b) (c) and (d) No. The Infrastructure Levy should not be used to build Affordable Homes. It is for Infrastructure and there is a shortfall already in money to fund infrastructure. It is a simple problem. If the planning consent demands a number of affordable homes of a certain specification to be bought at a fixed price by the local authority then they should be delivered. The cost of this can be worked out by the developer when applying for the planning consent and if they cannot afford to do the build then they should withdraw the application. It is the same situation when they try to sell a



luxury house off-plan. They have worked out the cost, set a price and have to then deliver on it. If you make it a requirement to deliver all Affordable Housing first then it would achieve 2 things. They would deliver the full quota of Affordable Housing and they would do it with some urgency so that there would be less likelihood of their cost predictions changing over time and becoming unprofitable for them. Also, it would incentivise them to get on with the remainder of the higher value market housing before the market conditions change their calculations. The current system just incentivises them to get permissions in the bank and then play the market to get the highest return and Affordable Housing is not their priority.

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

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

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

25. No. Your suggestions for how they might spend the Infrastructure Levy are both wrong. You have repeated the idea that it should be spent on Affordable Housing. No. It is an Infrastructure Levy. It is a tax on development to provide the infrastructure needs not a tax on house building to build houses.

You have also suggested that the Parish allocation of Infrastructure Levy could be spent on reducing council tax. This is wrong and should not be allowed. To incentivise the building of homes to gain an income to reduce Council Tax is abhorrent. The Council Tax is to fund the running costs of a community and all its services and maintenance. House building has no part in such funding and it would create a very unhealthy dependency.

Village Concerns are opposed to your proposals on your 4 short term measures. These are all going to help local authorities ignore the opinions of the public and other bodies that are opposed to development.



Kathryn Richardson  
Chair  
Village Concerns