

29 October 2020



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Planning for the Future White Paper – Consultation Response Views of The Housing Forum

Our Consultation Response

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

The proposals present a front-loaded plan making process and this would require a detailed evidence base to classify land into the three categories of growth, renewal and protected.

Local Plans will need to be comprehensive and to be effective should follow engagement with communities. This will require a change in the culture of plan making and development management and the adequate resourcing of local planning authorities.

Q8 (a) “Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?”

A standard method will give a holistic picture of the total number of homes required and should be set high enough to take account of lapse rates and other contingencies .

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?”

Affordability is an appropriate indicator and affordability of market rents is the better metric.

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

Greater clarity for developers and land owners will take an amount of delay and risk out of the development process but to do this, all constraints relating to a site (e.g. flood risk, ground conditions, etc) would need to be understood together with the specification of new facilities and infrastructure required in a large development.

Q10 “Do you agree with our proposals to make decision – making faster and more certain?”

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This would be welcomed and digitalisation of the planning process is overdue. However, in all three of the proposed development categories, there will be a need to draw on design codes and guidance which will take time and resource to develop.

Q14” Do you agree that there should be a stronger emphasis on the build out of development? And if so, what further measures would you support?”

More diversity of developers and development types will help this aim as will stronger emphasis on build out rates

Q17 “Do you agree with our proposals for improving the production and use of design guides and codes?”

The introduction of strict design codes would obstruct innovation and even when in place are open to interpretation and do not automatically translate into quality.

National design guidance which can be aligned with local codes and design variance would be better tools.

Q.19 “Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?”

Proposals to strengthen the objectives of Homes England to give greater weight to design quality and environmental standards should be given greater emphasis

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

Creating a simple, clear and certain planning system with attention to safety, quality and sustainability should be the basis of approval.

In renewal zones, a fast track could be applied for applications that conform to beauty standards as already set out in the local or neighbourhood plan.

Q.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?

These proposals could lead to less affordable housing in areas where need is greatest. Local levies that balance local existing use values and the local need for infrastructure should be set by local authorities as part of their plan making process

Q.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?

More value. If the Infrastructure Levy is going to replace the Community Infrastructure Levy and contributions from Section 106 Agreements, then it must capture more value to ensure that all of the affordable housing and infrastructure is delivered. Affordable housing should not be separated from market housing but delivered in mixed developments

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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?”

The Infrastructure Levy should secure at least the amount of affordable housing and on-site provision as under the current system, if not more.

Q25 “Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?”

Local authorities should have greater flexibility around spending if core infrastructure obligations have been met. The amount raised for affordable housing should be clearly and transparently calculated.

Q25(a) If yes, should an affordable housing “ring fence” be developed?

Affordable housing should be ring fenced for onsite delivery linked to NPPF and Local Plan policies and affordable housing need in the area.

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