

Response to White Paper on ‘Planning for the Future’
From
Churchill & Langford Residents Action Group (CALRAG)

CALRAG is organised by a group of some 50 residents, including professionals with planning skills. It works closely with Churchill Parish Council and with North Somerset Villages Alliance.

CALRAG has widely consulted residents on planning matters including strategic development strategies. It participated extensively in the West Of England Joint Spatial Plan (JSP).

In response to a recent Neighbourhood Plan survey, residents indicated overwhelmingly that they have already accepted more than enough new houses. Churchill is a village of some 850 houses, a further new 300 houses have been built or are being built, representing a 35% increase in the size of the village. Residents are witnessing the devastation resulting from poor planning.

Residents are under threat from at least four further unplanned, speculative developments where an appropriate assessment of need has not been established. Churchill is situated 16 miles from the employment centre at Bristol and 5 miles from the nearest railway station. These speculative developments which are unsustainable and unviable, are a direct result of the present policy forcing all local authorities to demonstrate a 5-year rolling housing land supply – a ‘one size fits all’ policy. Much of North Somerset is either Green Belt which is strangling Bristol, flood plain, or the Mendip Hills AONB.

It must be recognised that village life is a culture and should be respected as such.

CALRAG welcomes a review of planning but wishes to ensure more, not less power is given to Local Authorities and Parish Councils who are better placed to make democratically reached decisions.

1. Summary:

1.1. CALRAG draws attention to the CPRE report (21 October 2020) which states, “*The figures demonstrate that there is already enough available and suitable land in the planning system to meet the government’s ambition to build 300,000 homes per year for the next 5 years...*”

CALRAG considers that this should be the basis for reform of the planning system.

1.2. CALRAG believes that a fit-for-purpose planning system is an essential part of sustainable development to create strong, vibrant communities and a healthy environment. However it is essential to have the ability to plan the right developments in the right places, respecting climate change, biodiversity and communities that are currently sustainable (e.g. villages) which will help bring social equity and sustainable economic growth.

1.3. The white paper seeks to streamline the planning process. However it appears that this ‘streamlining’ is being used as a pretext to remove much of the planning powers presently possessed by each Local Authority. The Local Plan must include locally relevant policies. CALRAG agrees with other authorities that imposing a ‘one size fits all’ approach and a tripartite land classification will be profoundly detrimental to long term social and environmental objectives and to the local landscape.

1.4. The planning system needs to be able to distinguish between Need and Greed and force developers who are not building on land where current planning permissions have been granted. The primary need is for affordable and social housing.

1.5. The consultation completely fails to show how planning will fit with other vital and emerging objectives concerning our future environmental and climate change commitments. A fundamental change to building technology is required and needs to be speedily implemented.

1.6. The white paper still fails to link planning for housing with appropriate transport plans.

2. CALRAG response to the consultation questions:

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

2.1.1. **Overcentralised:** it is weighted against the local perspective. It takes no account of the nature of local communities, for instance a way of life that people have chosen. The culture of village life is a far cry from urban living.

2.1.2. **Undemocratic:** Consultations are held but this is a 'tick box' exercise. The results are commonly ignored by planning authorities.

Consultations are carried out during holiday periods when people are away or in the run-up to Christmas and New Year when people are least likely to be able to make informed comment.

2.1.3. **Unsustainable:** The rule that forces Local Authorities to demonstrate a five-year rolling housing land supply is creating unsustainable, dislocated, uncoordinated planning that lacks appropriate infrastructure. It creates a developer's paradise in areas that are far from employment and where there is no demonstrable need. This is destroying valuable wildlife habitats, ignoring Climate Change emergencies set by councils and creating a biodiversity crisis.

2.2. Question 2: Do you get involved with planning decisions in your local area?

2.2.1. The CALRAG team of some 50 residents and professionals gets involved with all development planning applications which affect residents. CALRAG works closely with Churchill Parish Council.

2.3. Question 3: Our Proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

2.3.1. The above assertion is tendentious and mistaken.

2.3.2. CALRAG shares the view that access will only be made available after decisions have been taken as appears to be the current case in North Somerset.

2.3.3. Communication is difficult but there should be far more prominent advertising on future developments through social media, emails etc.

2.3.4. The local view will be further weakened and will become even less effective.

2.3.5. Access to improved mapping and ready access to a range of GIS would help. Access to the (excellent) ONS database could be improved.

2.3.6. Parish Councils should receive planning training.

2.4. Question 4. What are your top three priorities for planning in your local area?

2.4.1. Affordable homes and increased access to good quality Local Authority rented accommodation.

2.4.2.Sustainability – homes to be built close to employment and leisure facilities where existing infrastructure is in place.

2.4.3.The Environment: The health and wellbeing of residents is paramount.

Reversal of the current flippant approach to local biodiversity and ecology taken by developers.

The ability of developers to ‘offset’ against other sites is preposterous.

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

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

2.5.1. No. Clarity with simplicity is high desirable, but paradoxically, these present proposals would be disastrous because they impose a meaninglessly simplistic national prescription. Why promote this present retreat from Localism? Delays within the planning process arise for many reasons and delayed implementation of plans with permission can also occur for good reasons. Delays can be caused by sheer volume of work placed on poorly-staffed planning departments where training of planners is insufficient.

2.5.2.CALRAG believes that the ‘zoning’ of land into 3 categories for Growth, Renewal or Protected lack clarity. It appears that the existing Green Belt will be sacrosanct. This will cause urban sprawl to leap-frog over Green Belt. Paradoxically, Green Belt is clearly strangling vibrant, expanding cities such as Bristol, destroying swathes of good quality agricultural land and the ecology and biodiversity which such land sustains. The paradoxical consequence is increasing transport-related carbon emissions as developments are far from employment, leisure and other infrastructure.

2.5.3.CALRAG disagrees with the policy of providing locally devised design codes:

2.5.3.1. It must not simplify the Local Plan to the extent that it becomes merely a template for development in accordance with national general development principles, currently being formulated.

2.5.3.2. It must not remove the Local Authority overview on local land allocation. The Local Plan should set out the local planning policy priorities.

2.5.3.3. Currently, the climate crisis and the need to respond to climate change in planning terms is an over-arching priority

2.5.3.4. The Local Plan cannot be merely a template for building homes, without consideration of the other priorities affecting land allocation. Development must be based on a locally recognised NEED not GREED.

2.5.3.5. The format proposed is not sustainable or fit for purpose.

2.5.4.CALARAG disagrees with the proposals to remove considerations of soundness, environmental assessment, viability assessment, and the duty to co-operate. These are inseparable from the Local Authority’s overarching role to take effective local action on climate change and respond to the ongoing and changing needs of local people.

- 2.5.5. The proposal for an emphasis on place-making and beauty is very welcome, but a stripped back, oversimplified Local Plan will not facilitate that, and in fact works against this objective.
- 2.5.6. CALRAG disagrees with the absence of a proposal for a sustainability/carbon cost assessment of development schemes which are to be put forward for areas designated for growth and renewal. These should be standard. Many local authorities and companies are undertaking standardised sustainability assessments, and they would not be an undue cost burden for SME developers.
- 2.5.7. CALRAG disagrees with the lack of emphasis on consultation with local people. Unless there is a requirement for comprehensive local consultations, including social media campaigns and surveys up front at an early stage in the plan making process, people will simply not be aware of the far reaching proposals to grant permission in principle for growth and renewal areas.
- 2.5.8. Many local people have in-depth, appropriate knowledge of their locality, landscape, hydrology, which should be considered and respected. This is very apparent with development at the foot of the Mendip Hills. Here, development on pastures that previously acted as natural soakaways from massive flooding arising from rainwater collecting and then draining down from the Mendip Hills, has caused the need for major and highly costly solutions which have not fully resolved the serious flooding issues.
- 2.5.9. Comments at the reserved matters stage, are ineffective – it will be too late to make any meaningful changes. It is essential to consult with local people to ensure an understanding of the development.
- 2.5.10. CALRAG questions what has happened to Localism?
- 2.5.11. **CALRAGS agrees with:**
- 2.5.11.1. Simplifying the plan-making process through the provision of training for planning skills, ongoing resources and digital technology.
 - 2.5.11.2. Local Plans should be visual, map-based including clearly defined design codes and should be based on a standard template.
 - 2.5.11.3. Greater consultation and engagement on Local Plan preparation.
 - 2.5.11.4. Incorporating Neighbourhood Development Plan provisions.
 - 2.5.11.5. Shorter time limits for Local Plan preparation and inspectorate action, potentially 30 months, providing there is upfront provision of major new Government funding for training, DataTech, appointment of an officer responsible for Place-Making, neighbourhood forums and consultations.

2.6. Question 6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development

management policies nationally? [Yes / No / Not sure. Please provide supporting statement.]

2.6.1. No. Government policies should be coherent and properly interconnected. These present proposals are entirely disconnected from other stated and vital objectives of Government like stemming the 'greenhouse' effect and revising strategies to encourage a reduced consumption of energy and material.

2.6.2. Excessive centralization is highly undesirable.

2.6.3. There is a need for local authority planning policy to be defined, which identifies area characteristics and how the Local Plan will give effect to climate change mitigation, place making, and infrastructure provision, in the local context.

2.6.4. National Planning Policy cannot recognise the needs of a Local Plan or its population. An example can be given within COVID 19 of the Government trying to centralise the 'Test and Trace' for the pandemic yet requires the skill set of Local Authorities.

2.6.5. There is a definite need for a clear, comprehensive government plan for achieving net zero emissions by 2050.

2.7. Question 7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of "sustainable development", which would include consideration of environmental impact? [Yes / No / Not sure. Please provide supporting statement.]

2.7.1. No. It is unclear what the 'new consolidated test' will request.

2.7.2. Sustainable Development has become a term so degraded as to be meaningless within planning speak. We should return to the original Brundtland (1987) definition, *"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs."*

2.7.3. Unfortunately, policy pursued ever since 2012 has persistently emphasized immediate economics and has persistently downplayed the social and environmental aspects of NPPF.

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

2.7.5. This vital activity is very hard to achieve within an excessively adversarial competitive financial environment of short-termism - such as prevails at present.

2.8. Question 8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]

2.8.1. No. The standard method for assessing Local Authority housing need is founded on profoundly simplistic and flawed concepts whilst the proposed revision of the formula towards increased aggressiveness, based on a flawed algorithm, will ensure that it

exacerbates the undesirable trends already promoted by the present, evidently failed formula. Unfortunately, over the last few decades, housing and housing land has become a commodity for speculative investment – not a route to satisfying an essential human requirement for shelter. This is the essence of the soaring prices for housing and housing land.

2.8.2. The need for Local Authorities to be able to demonstrate a five-year rolling housing land supply is causing inappropriate, ‘fag-packet’ speculative house-building with little regard to infrastructure or issues related to climate change, ecology or biodiversity.

2.8.3. Question 8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]

2.8.4. No. Affordability has not been achieved due to the answer given to Q 8a. Developers have been allowed to reduce their obligation agreed when planning permissions are granted. This is a complex area. However were developers to be forced to build the planning permissions already granted there would be enough homes built to ensure sufficient affordable houses in the right places – close to employment where people can walk or cycle to work. A more satisfactory solution would be to charge Council Tax on all the houses granted planning permission within 6 months of the planning permission being granted.

2.8.5. Existing urban areas are surrounded by Green Belt which is strangling vibrant, expanding cities such as Bristol. It is time that Green Belt land was reallocated to ensure that Urban Sprawl does not leap-frog over Green Belt.

2.9. Question 9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement.]

2.9.1. No. This classification and assessment is crude and would be profoundly damaging to the character of some parts of the landscape e.g. areas close to AONBs, SSSIs etc. The actual English geographies (and high population densities) are too complex a mosaic to be accommodated in this spatially blunt way.

2.9.2. CALRAG questions how local people could object to new growth areas decided nationally? CALRAG again fears that this is taking decision-making away from Local Authorities, Parish Councils and residents and dictating from an organisation that does not know the local area and its character.

2.9.3. Question 9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]

2.9.4. No. The proposals fail to acknowledge the small-scale spatial (and temporal) complexity of the densely populated English landscape.

2.9.5. The proposals given for Renewal areas have been highlighted below and are:

2.9.6. To 'cover existing built areas where smaller scale development is appropriate. 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. There would be a statutory presumption in favour of development being granted for the uses specified as being suitable in each area. Local authorities could continue to consider the case for resisting inappropriate development of residential gardens'.

2.9.7. **Town Centres:** Development in town centres is appropriate, but this should not be grouped in with small sites within or on the edge of villages. At the moment, sites outside the village boundaries are being sacrificed due to the 5-year rolling housing land supply rule.

2.9.8. **Villages:** Further large-scale developments on greenfield sites on the edge of villages should not be grouped with development in town centres. Villages are an important part of the English landscape and are coming under increasing pressure from inappropriate, speculative developers whose applications are creating inappropriate 'fag-packet' planning developments that are in the wrong place, miles from employment, lack the infrastructure to go with them and go against any Climate Change initiatives that the government may wish to succeed. They are turning self-contained, attractive characteristic villages into soulless dormitory towns. This paper does nothing to address this issue. There are enough Brown Field sites in order to satisfy the current demand. The White Paper needs to address this issue and not sacrifice some of England's most attractive rural landscapes and the 'culture' of village life.

2.9.9. There is also an increased danger of coalescence of villages through creeping urbanisation.

2.9.10. Renewal area development can adversely affect buffer zones and views in and out from protected areas. Green Infrastructure lags behind any development and should be constructed before development.

2.9.11. Woodlands, SSSI's, AONBs and National Parks should receive extra protection from development. There needs to be a thorough reassessment of Green Belt to allow modest development close to expanding cities where people can walk/cycle to employment and leisure activities.

2.9.12. Question 9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement

2.9.13. No. This NSIP status would simply remove almost all constraints on the siting and mode of their development. Measures already exist to permit the siting of New Towns.

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

- 2.10.1. No. CALRAG believes that there will not be adequate time to appropriately prepare for appropriate examination of the proposals.
- 2.10.2. If Government is to centralise planning there will need to be greater consultation and engagement on Local Plan preparation, given that the public will not be consulted before granting outline planning permission for applications affecting land designated for growth.
- 2.10.3. CALRAG believes that the outcome of these particular proposals will be angry communities further alienated from Government.

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

- 2.11.1. Yes. But remember those less computer-literate. Likewise for other supporting documents such as registers, codes, and other resources/assessments such as the strategic Infrastructure and green Infrastructure plans.
- 2.11.2. These must not be removed from the relevant websites without warning as has happened at the end of the West of England Joint Spatial Plan where all the informative and essential documentation is now inaccessible.

2.12. Question 12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement]

- 2.12.1. Not in the dirigiste planning climate you propose.

2.13. Question 13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure.]

- 2.13.1. Yes. Churchill is currently undertaking a Neighbourhood Plan. CALRAG believes that Neighbourhood plans are highly democratic and must be respected.
- 2.13.2. **Question 13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?**
- 2.13.3. Unfortunately, the proposed planning climate would destroy such localism.
- 2.13.4. It needs to be remembered that Parish Councillors and those who have the time to spare are volunteers, not paid employees.

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

- 2.14.1. There is potential land-banking by developers and private landowners, and the taking out of options over land. A time limit for build out of developments would resolve this problem and give more housing.
- 2.14.2. Sites left waiting for build-out are unsightly and cause uncertainty to local residents and leave an unattractive mess.

2.15. Questions 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]

- 2.15.1. There has been a recent explosive rash of local development with zero provision of new infrastructure and uninspired housing. Moreover, environmental considerations and objectives, previously embodied in the local plan, are being trashed. Old hedgerows have been needlessly ripped out destroying not only wildlife habitats and ecosystems but also the basic village character.
- 2.15.2. The four large-scale new developments have overwhelmed the village and its resources. The design is standard and does not conform to the vernacular and does not help create a sense of place.

2.16. Question 16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify] further measures would you support? [Yes / No / Not sure. Please provide supporting statement.]

- 2.16.1. Government's present use of the word *sustainability* has significantly changed. The definition of 'sustainability' needs to return to the original Brundtland (1987) definition - "*Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.*"
- 2.16.2. The current use of the word 'sustainability' does not conform with the recommendations of the Climate Change Committee.
- 2.16.3. There are yet no government guidelines for public sector investment in carbon reduction, (which includes house builders and developers) or any comprehensive plan for achieving net zero carbon by 2050, as the government pledged to do last year.
- 2.16.4. CALRAG would support the introduction of a defined 'Sustainability Test' which the public can use to see if a development is sustainable.
- 2.16.5. CALRAG believes that much would be achieved in terms of sustainability if houses were built close to centres of employment and leisure and where the infrastructure is already in place. Much of this would require small adjustments to the vast swathes of Green Belt land.
- 2.16.6. Green Belt land needs to be reviewed to prevent urban sprawl destroying the countryside which is so valuable to those living in towns and cities. Here we refer to Bristol. Many city dwellers enjoy the peace and tranquillity that the Mendip Hills AONB offers. Sadly this is currently under threat and will be even more so unless these proposals address sustainability in the above terms.

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

- 2.17.1. Yes. Codes are important but there will need to be extra resources available to ensure regulation and enforcement.

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

- 2.18.1. Not sure. Everything would depend on the actual terms of reference (and independence) of such a post. An independent, chief officer for design and place making in each local authority with powers of enforcement needs to be appointed.

2.19. Question 19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes / No / Not sure. Please provide supporting statement.]

2.19.1. Not sure. Improved Building Design is crucial for our low carbon future – but delivery is a complex issue requiring understanding leadership from Government.

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

2.20.1. CALRAG agrees that all streets should be lined with trees wherever practical. Trees confer many environmental benefits. However, 'fast track for beauty' appears to be a nebulous slogan. The Building Better Building Beautiful Commission Report (Jan 2020) makes helpful and comprehensive proposals.

2.21. Question 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]

2.21.1. CALRAG, representing village residents believes that there should be a local survey to establish the NEED and to deny the GREED. This is to ensure that villages are not turned into soulless dormitory towns.

2.21.2. Housing needs to be built near centres of employment. Although COVID 19 has allowed people to experience working from home, CALRAG believes that 'flexi-working' will occur. Houses will need to be redesigned to accommodate appropriate working conditions from home.

2.22. Questions 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.]

2.22.1. A crucial deficiency at present is the absence of adequate mechanisms for timely capital investment in new infrastructure. Consequently, infrastructure is persistently poor and lags badly behind housing development.

2.22.2. CALRAG believes that any community levy should be set with a local threshold. However, Infrastructure levies should be flexible enough to encourage developers to build on brownfield sites and achieve urban densification.

2.22.3. Proposals that the number of units qualifying as small scale development without the provision for affordable housing and a fair share of payment towards infrastructure, is increased to possibly 40-50 units does not bode well for either provision of sustainable or affordable housing, and can only be seen as a precursor of further undesirable urbanisation of rural areas.

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

2.22.5. It would help to set this rate with a locally determined component.

2.22.6. CALRAG believes that all decisions should be made locally where local needs and aspirations for housing, industry, social need and recreation can be appropriately assessed which would lead to clearer and more appropriate decisions. Infrastructure Levy should therefore be flexible with a local element. Such a system also provides a necessary antidote to increasingly centralised management that could result in a

single national strategy that unfortunately does not reflect either regional or local opinion, aspiration, or need.

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

2.22.8. CALRAG believes that the capital investment ratio (new infrastructure/new housing) is chronically underestimated. The CIL fails because it unfortunately perpetuates this low ratio and inadequate infrastructure is the result, perpetuating the chronic under-investment of the past.

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

2.22.10.No. Such a move could provide national government with too much opportunity to divert and control funds to specific areas of a political choosing. Developers should be set local parameters for infrastructure contribution to developments and given the flexibility to source that funding. The system needs to move away from centralisation at national level and its sibling, regional centralisation, to become more localised and independent.

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

2.23.1. Yes. However, Permitted Development needs to be heavily constrained to prevent abuse. Conversions of office space to dwellings can be problematic. Certainly, the current astronomic increase in land value attached to permission for housing development needs to be captured for society by appropriate taxation during the permission process.

2.23.2. An example of abuse of a form of Permitted Development is Bristol Airport's proposed construction of a multi-story car park, which turned out to be an office block allegedly for rent.

2.23.3. More and more developers using permitted development rights in which they change the development considerably. There is nothing that local people or parishes can do to stop permitted development.

2.23.4. All development should be subject to full planning application and building regulation. No industries (e.g. agriculture) should be the subject to any concessionary rights.

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

2.24.1. The present failure to achieve target amounts of affordable and social housing is a major component of the housing issue. The proportion of affordable (and social) housing should be a high priority both at the plan stage and subsequently during construction and sales. Loss of the affordable element during implementation is an unacceptable abuse by the developer.

- 2.24.2. CALRAG notes with grave concern the suggestion that the development size threshold for an affordable requirement might be elevated to 45-50 homes.
- 2.24.3. Question 24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes / No / Not sure. Please provide supporting statement.]**
- 2.24.4. No. This complex issue would be best addressed by a return to the view that local authorities should assume direct responsibility for some aspects of housebuilding. At all events, the (minimum) affordable element of any development should be enforced by law.
- 2.24.5. CALRAG believes that Local Authorities should have restricted opportunity to manipulate how and where infrastructure money is spent to prevent the development of more of the historic social housing estates.
- 2.24.6. CALRAG believes the emphasis should be on building quality, affordable, eco homes.
- 2.24.7. Question 24 (c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]**
- 2.24.8. Not sure. The underlying problem remains that infrastructure and (affordable plus social housing) components are both sorely under-capitalised at present.
- 2.24.9. Question 24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]**
- 2.24.10. Yes. We need to encourage an innovative approach to deploying new building techniques.
- 2.24.11. Revision of the planning and construction regulations and the application of uncompromising rigid adherence to a set of minimum standards relating to planning construction and infrastructure provision could be acceptable only if rigorously monitored and enforced.
- 2.25. Question 25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]**
- 2.25.1. Yes
- 2.25.2. Question 25(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]**
- 2.25.3. Yes. Present Policy is long on rhetoric and short on delivery. Key to resolving this is to avoid the present impossible conflicts arising between affordable and social housing on the one hand and the overall numbers of houses built. See response to Q24b.
- 2.26. Question 26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?**
- 2.26.1. The most vulnerable fraction of the population (see section 149 of Equality Act) will be that part most disadvantaged by the ill-considered measures proposed in this White paper.
- 2.26.2. CALRAG believes that this will accelerate the present drift towards an ever-widening gap developing within society. This trend is a disaster.

2.26.3. CALRAG believes that the potential impact of the proposals raised, without consideration of a National Carbon Reduction Plan, and lack of attention given to carbon reduction measures and other measures mitigating the effects of climate change, has a potentially damaging impact on planning requirements and housing standards, including for the elderly and disabled.

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