

### Summary

The White Paper is presented in three key pillars:

1. Planning for development
2. Planning for beautiful and sustainable places
3. Planning for infrastructure and connected places

#### 1. Planning for development

The proposed shift from a discretionary to a zonal system radically changes the planning system. Areas zoned as Growth in the Plan will effectively automatically be conferred outline permission. Consequently, there is a structural change with far greater detail and resource front-loaded into the Local Plan process and much more permitted development and automatic consent rights following. As well as significantly increasing the complexity and expense of Plan production the Paper proposes a restrictive timeline for Plan production. With the current level of detail, it is difficult to see how an appropriately robust and detailed Plan can come forward in the proposed timelines. Further, it should be noted that there will be a significant increase in preparing a Plan, whilst the Council will see a reduction in fees with the removal of the need for outline planning consents.

Far greater detail is required to understand and comment meaningfully on many of the proposals, particularly those that propose the removal of something currently fundamental to Plan production (such as the Duty to Cooperate or Sustainability Appraisals) without any detail of an alternative. However, we object to many of the proposals in the Paper, and believe that the direction of travel outlined will lead to less public and local democratic involvement in the planning system and significantly greater and more onerous requirements on Local Planning Authorities.

#### 2. Planning for beautiful and sustainable places

This pillar suggests several proposals to increase design quality and offer quicker routes to approval for 'beauty'. The path to defining and then finding consensus on what is 'beautiful' is not mapped out, and we do not believe that can be done on a national level. We wish to see an increase in importance of design, but much of the rest of the White Paper (such as the rigid and short timelines for Plan making and determining planning applications) will work against that materialising.

#### 3. Planning for infrastructure and connected places

The key proposal in this pillar is the abolition of Section 106 and CIL and the creation of a new Infrastructure Levy. Where Section 106 attributes the cost of required infrastructure to a development, the proposed IL is a levy based on residual value in a site once a threshold has been passed. There is, therefore, a prospect of sites not contributing the full cost of the infrastructure required via the Levy, which causes significant concern. The result of the IL will place the responsibility, and potentially the financial burden, on Councils to provide either gap or forward funding to deliver the necessary infrastructure at the right time, with the Levy recouped later.

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

Democratic / Evidence-based / Balanced

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

Yes. Coventry City Council is a Local Planning Authority and, as well as setting the Local Plan and determining planning applications, works across borders regionally on a range of spatial planning matters.

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

**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]**

The White Paper will not make it easier for people to access and engage with the planning process. The effective removal of the outline planning process will remove one of the most visible and engaging parts of the planning system, and so the ability of people to access and contribute to planning decisions will be reduced by these proposals. Furthermore, the proposals place the most meaningful and extensive contributions early in the Plan-making process, and so applications will come forward many years after the point of consultation and public influence with potentially no further opportunities to comment on or influence outcomes.

Comments on Local Plans have certain statutory requirements which often serve as a barrier to engagement, especially to those who feel that they do not have sufficient time or technical knowledge to meaningfully contribute. Removing these barriers, whilst still retaining sufficient robustness to engender meaningful and constructive consultation is essential in building trust between the public and plan making. This requires time and resource, both of which are being restricted or redirected by the White Paper proposals.

**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]**

Providing the development our residents need: Through our Local Plan we have allocated significant sites to address growth projections for the city, despite a highly constrained geography. The constraints are such that neighboring authorities have, through the Duty to Cooperate, taken elements of our unmet need. The proposed new Standard Methodology will more than double the number of dwellings required than we can accommodate. The Local Plan also delivers affordable housing requirements to developments, responding to the local pressure for, in particular, social rent tenures. It goes beyond housing, as in order to deliver a prosperous City we must also allocate – and protect – employment land, providing access to job opportunities across a range of sectors, ensuring that our vibrant economy continues to innovate and grow. Continuing to plan for the right development, in the right places, is essential.

Delivering the right infrastructure, in the right place, at the right time: It is critical that infrastructure is deployed in a timely manner, at the point that it is needed within a development, the cost of which should be principally born by the financial beneficiaries of a development. The introduction of the Infrastructure Levy will take that requirement away, with Local Authorities required to forward fund projects if they are to be in place at the appropriate time. Our Local Plan requires the early provision of infrastructure

Protecting and improving the environment: Coventry is fortunate to have ready access to areas of green belt, ancient woodland and high quality public open space. Protecting and improving these areas are imperative, as is increasing the bio-diversity and ecological value of our green spaces, improving and decarbonising energy consumption, promoting sustainable modes of travel and methods of construction and many other related initiatives. The Local Plan addresses these needs across a range of policies and further work is being done developing a range of additional methods to further combat climate change. We also seek to improve the built environment

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

No, we do not agree that the proposals will provide simplification.

The White Paper allows for the annotation of land into one of three zones. However, zones will inevitably overlap (for example, conservation areas within city centres, where neither *renew* or *protect* annotations are adequate) and so there will inevitably be sub-categories in zones to deal with overlaps or variations in, for example, density. Add in layers of differentiation through design codes and pattern books, and the result is a system just as complicated as the current one, maybe even more so.

**6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement.]**

No. Repetition of NPPF policies in Local Plans is superfluous and should be discouraged. However, Coventry City Council's Local Plan (and many others) contain further development management policies that reflect local priorities not adequately covered by the current NPPF. By elevating all development management policies to a national level there will be no scope for appropriate local interpretation, nor for local voices to be heard in the drafting of DM policies. A national document will either need to be so flexible that it allows for too much latitude of interpretation or so directive that significant areas of local concern are not addressed, with the new-style Plans prevented from addressing this.

There is, therefore, a significant risk that streamlining the development management policies out of Local Plans will leave a deficit of local input and a lack of flexibility to adequately address local priorities and concerns.

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

No. The potential to remove of some of the complex hurdles to adoption of a Plan is positive, but must be done so cautiously. In particular, the SEA/SA process is both essential and complex, but

replacing it needs careful consideration; the purpose should be to assess impacts and appropriately protect the environment and this vital function must not be lost to ensure speed.

The consolidated test must be clearly articulated in order to ensure consistent application. The definition of “sustainable” with regards to development is contested and not as widely understood as the White Paper claims. Clear and concise definition through legislation or the NPPF is essential for the test to function equitably.

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

Without a requirement to do so, strategic cross-boundary issues risk not being adequately considered or addressed. The proposal to centrally modify housing number with constraints and then issue a binding requirement does not obviate the usefulness of the Duty to Cooperate in producing coherent spatial planning over a broader geography. Much evidence base work is best undertaken and analysed at a sub-regional or HMA level. Therefore, a requirement for LPAs to work together on a range of strategic areas such as employment land, strategic infrastructure or green belt studies needs to remain.

Any such requirement would need to set the parameters both spatially and in terms of governance and leaving this guidance absent following the abolition of the DtC will lead to a vacuum in strategic policies and, by consequence, worse planning outcomes. The need for this is heightened with the increases in housing required via the new Standard Methodology, the quantum of which is such that new towns and settlements – potentially pooling requirements - become more viable.

More information is needed regarding the application of constraints to the requirements produced by the revised Standard Methodology and how unmeetable demand is then redistributed. Any such work needs to be cognisant of functional economic geographies, commuting patterns and so forth of local geographies, and this is best done on a regional or sub-regional basis.

**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.]**

No we do not agree. The principle of a transparent, equitable and consistent way of establishing housing need is supported but strongly believe that the ability for communities to accommodate growth should be incorporated at the first stage of this calculation.

We disagree that constraints should be applied at a central level, and that this is more appropriately applied at a local level. The White Paper is unclear regarding mechanism for calculating and applying constraints, by whom and how residual unmet need is then re-distributed. These are important, complex matters and by removing this from public view we feel that there is a significant deficit in public scrutiny and an inherent worsening of the process.

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

No. As stated in our response to the consultation on the revision to the Standard Methodology the increased affordability calculations, by focussing solely on LPA geography, do not consider the economic reality of people’s work/live patterns, and thus falsely inflate housing requirements.

The resultant increased allocations will not necessarily increase delivery nor lower house prices as there a significant number of other impacting factors relating to affordability beyond land supply, as can be clearly discerned by the volume of consented but undeveloped land across the country.

**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.]**

We do not. Outline applications are the point where much of the public involvement in the planning process takes place. The proposal removes this and hopes that the public will instead get involved at Plan making stage, which although would be welcome has not been the case previously. By shortening the Plan making process and increasing the amount of detail required (if annotations are to be delivered with sufficient comfort in outcome through detailed design guides) this will potentially be an even more complicated time for a layperson to get involved.

By front-loading the system in this way, the White Paper places an unsustainable burden on the LPA to effectively prepare a Plan and assemble all the evidence required for a multitude of outline permissions simultaneously. This is not deliverable.

By trying to expedite the process the proposals disregard the checks and balances provided by proper scrutiny and disaggregating the Plan and outline stages. There is significant time and cost in preparing the necessary studies related to an outline application that currently sits with the beneficiary of the consent i.e. the developer. The proposal shifts this responsibility to the LPA but without suggestions on how these sizable new requirements can be met, and on a severely constrained Local Plan timeline.

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

No. Where the zonal system could conceivably provide a pathway to quicker consents (notwithstanding the issues of producing a sufficiently robust Plan in the constrained time allowed) the likely patchwork of varying Renewal and Protected areas will mean that there is a much lower opportunity for quicker approval methods in these annotations. The mooted use of Permitted Development rights for certain development types within Renewal areas causes particular concern. Given the inevitable constraints that the land currently proposed as Renewal it is likely that all applications would require consideration by a officer in order to apply appropriate professional judgement.

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

No. Settlements brought forward through the NSIP will further disconnect the local population from development proposals in their area. If Local Plans are to be meaningful documents then delivery of new settlements, their design and response to local issues and distinctiveness should come forward from that process rather than any other.

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

No, we do not. Any proposal to remove consultation or public interaction in order to make the process quicker should be treated with caution. It is entirely appropriate for democratically elected representatives to review and decide upon applications, with officer support, where statutory or public concern has been raised, or significant impacts noted. Delegating major decisions to officers where principals of development have been established, potentially many years previously, will serve to disillusion the public and engender distrust of the planning system.

We support the increased digitisation of both Plans and applications and there may be some opportunities to remove minor delays with further progress here, but fundamentally planning is an exercise of professional judgement and this requires appropriately trained and resourced staff.

Restricting planning statements to a particular and arbitrary length, irrespective of the requirements of the site, along with the removal of the potential for agreed extensions of time will lead to decisions made in undue haste and with inadequate information. The determination of an application is an essential part of the growth of a City and should not be made lightly in order to deliver a quick system.

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

Yes. Accessibility of Plans is important and bringing them into a coherent, consistent and accessible modern format is welcomed. Clearly, we need to be aware of the varied levels of access to internet usage and there will be some members of the community that need printed documents or alternative, non-web-based routes to engage with the Plan making process and subsequent usage.

Any requirement to standardise will inevitably require a period of transition and may have contractual implications, along with accompanying procurement, infrastructure and training requirements. All of these are time and resource hungry processes that need to be factored into any concrete proposals.

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

No, we do not. The current proposals make Local Plans a significantly greater task through the requirement to assemble the necessary evidence to grant the equivalent of an outline permission on all areas of growth and, potentially, some renewal annotations. We support measures that help bring forward timely Local Plans and limit the expensive and time-consuming process of Plan making, however this is adding large levels complexity whilst severely limiting the time available.

The capacity of LPAs to deliver this detailed and essential work would need to be significantly bolstered, especially given the inevitable reduction in fees from removal of outline applications. Further, there will be exponential pressure on external bodies, statutory bodies and the Inspectorate. Any requirements for new style plans following legislation must be phased cognisant of these issues and with sufficient latitude for the raft of plans being prepared simultaneously to be given the consideration each is due.

**13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]**

It is not clear within the White Paper what purpose Neighbourhood Plans will play within a zonal system, especially where a Plan brings forward design codes/pattern books for Growth areas. The majority of Neighbourhood Plans relate to design matters and so risk repetition or conflict with design codes. The suppressed timelines for Plan adoption are such that meaningful collaboration on design codes with Qualifying Bodies will be all but impossible however desirous.

**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?**

The issues regarding capacity and skills in delivering digital Local Plans are magnified at a Neighbourhood level which predominantly rely on volunteers and a small grant. The creation of free-to-use set toolkits and programmes from which to build NDPs from would help with this and minimise the amount spent on consultants. However, as per our answer to 13(a) the purpose of NDPs needs to be clarified to ensure the time that communities spend on them translate to improved decisions in their areas.

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

Yes, Plan making does not happen in a vacuum, and ensuring the actual completion of consents is a concern. The current system of penalties for lack of delivery (such as the Housing Delivery Test) is aimed squarely at the Local Planning Authority irrespective of the limitations of their influence once sites are allocated through a Plan, or consented through application. Simply allocating more land does not automatically bring forward developments. One area that could be reviewed is the minimal amount of work needed to make a material start on development and thereby circumvent a consent expiring without delivering the homes needed. Adding additional penalties to Local Planning Authorities if development does not complete in their area will not bring about a change in results, and more needs to be done to bring pressure to developers.

**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]**

As with every City, Coventry has recent designs that are considered beautiful and others that are considered less so, not least due to the subjective nature of beauty. Design quality is always promoted by the Local Planning Authority, but this must be done whilst not undermining on project viability. The city strives to continue a narrative of architectural innovation and as such aims to promote positive, forward thinking contemporary design, of which there are positive recent examples. Delivering a high-quality urban environment within the city centre remains challenging in the context of current global economics, but the Council are taking the lead by delivering joint ventures and stimulating complimentary development.

**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]**

We do not believe that sustainability is at the heart of this or several other recent government proposals. There is a disconnect between the statement in this question and the recent changes to Permitted Development rights and the Use Class Order which provide for significantly less control and guidance on the design and functionality of some new and altered buildings. This, coupled with the significant increases in housing requirement resultant from the proposed revision to the Standard Methodology, mean that sustainability is being designed out of the system rather than placed at its heart.

The provisions of our Local Plan have sustainability at its core; spatially through location of growth and resultant infrastructure requirements, and also through more detailed development management policies, the latter of which the White Paper proposes removing local input on. There is no single area of sustainability that should be prioritised, but we must respond to global and localised issues and deliver appropriate, distinctive solutions if we are to see meaningful change.

**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.]**

No. The production and adoption of design guides and codes has the potential to be positive to plan making and the determination of applications. They must be created locally, reflecting local distinctiveness and address local issues. To do so requires high quality engagement, is resource-heavy and requires sufficient time for meaningful consultation. The proposal in the White Paper is contrary to this with its frontloading of extremely complicated matters on a highly restrictive timeline. In these circumstances it is often design that loses out as the imperative will be to accommodate the now-binding, inflated housing requirement.

We believe design codes must be developed in such a way to allow architectural creativity and expression to ensure compelling, interesting place making is achieved, care must be taken that design codes do not discourage this freedom of expression and by doing so inadvertently deliver overly prescriptive guidelines which in turn lead to repetitive design solutions.

**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.]**

Yes. Irrespective of the merits of other proposals of the White Paper the greater guidance a central body would give is welcomed, as well as raising and solidifying the process with a clear local leader. In order to deliver real benefit this must be accompanied by appropriate and adequate resource from the centre to Local Planning Authorities.

**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.]**

Yes – we are optimistic that the emphasis on quality of design nationwide will help control some of the negative forces of economics which may prescribe higher quality design solutions in more affluent areas, and instead allow all to benefit from positive high quality architectural design and place making.



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

The proposals in the White Paper lack meaningful detail regarding identifying 'beauty'. This is understandable due to subjective and contextual nature of defining something as 'beautiful'. It is unrealistic to build a consensus on beauty and then apply a quicker process to this. By creating this option LPAs will be under pressure to find development types 'beautiful' or nationally-set 'beauty' guides will be set, further distancing local interaction and influence on development.

**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]**

Our priorities are laid out in the answer to question 4. Developments should make a positive impact on the City, delivering places we are proud of and we do not believe that you can pick a single, narrow priority. Other Councils will have differing objectives, and this highlights the need to have locally produced policies to ensure that these distinctive differences are articulated and delivered.

The broader objectives of the Council, as articulated in question 4 are:

Providing the development our residents need: Through our Local Plan we have allocated significant sites to address growth projections for the city, despite a highly constrained geography. The constraints are such that neighboring authorities have, through the Duty to Cooperate, taken elements of our unmet need. The proposed new Standard Methodology will more than double the number of dwellings required than we can accommodate. The Local Plan also delivers affordable housing requirements to developments, responding to the local pressure for, in particular, social rent tenures. It goes beyond housing, as in order to deliver a prosperous City we must also allocate – and protect – employment land, providing access to job opportunities across a range of sectors, ensuring that our vibrant economy continues to innovate and grow. Continuing to plan for the right development, in the right places, is essential.

Delivering the right infrastructure, in the right place, at the right time: It is critical that infrastructure is deployed in a timely manner, at the point that it is needed within a development, the cost of which should be principally born by the financial beneficiaries of a development. The introduction of the Infrastructure Levy will take that requirement away, with Local Authorities required to forward fund projects if they are to be in place at the appropriate time. Our Local Plan requires the early provision of infrastructure

Protecting and improving the environment: Coventry is fortunate to have ready access to areas of green belt, ancient woodland and high quality public open space. Protecting and improving these areas are imperative, as is increasing the bio-diversity and ecological value of our green spaces, improving and decarbonising energy consumption, promoting sustainable modes of travel and methods of construction and many other related initiatives. The Local Plan addresses these needs across a range of policies and further work is being done developing a range of additional methods to further combat climate change.

**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.]**

No. The proposals do not consider the value of infrastructure required to make a development suitable and instead focus on the value of development once certain costs have been discounted. It would therefore be possible for significant and required infrastructure projects to be underfunded, with no identified mechanism for bridging the funding gap.

By making the levy due at the end of the development process there is no funding available to deliver enabling infrastructure in advance of occupation, meaning that either Local Authorities will need to forward fund infrastructure projects – and accept the inherent risk in such a proposition as they cannot be certain of when, or how much of the IL will be received – or projects will commence after the dwellings rendering the smooth and orderly delivery of sites impossible.

Section 106 agreements also relate to matters that cannot be covered by a financial levy, such as the transfer of land, and an alternate legal process would need to be created to ensure these necessary agreements still take place.

In short the proposal will not result in a quicker or simpler system and brings the risk that there will be a gap between the money needed and the money the Levy raises, with no mechanism to bridge the gap.

**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]**

They must be set at a local level in order to fully consider and reflect the economic circumstances prevalent in specific areas. If set at a national level the result will be unnecessary viability exemptions which would see no levy collected and yet infrastructure requirements being generated by sites.

**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.]**

Within the confines of viability as much levy as possible should be sought to deliver the infrastructure required. In this context infrastructure includes affordable homes, high quality public spaces, biodiversity improvements, alternative transport modes and so forth, all required in order to deliver the types of communities we should be aspiring to see delivered.

**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.]**

The risks of borrowing against the IL have been noted in the answer to 22(a).

**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.]**

Yes. Developments under PD often create infrastructure demand that is not currently contributed to through Section 106 agreements. It is not just housing that creates infrastructure demand that needs to be taken account of. The recent creation of Class E and the removal of the principle of development within that class for its previously separate constituent parts will make discerning the residual value of a Class E scheme impossible given the different yields from, for example (what was) B1 and (what was) A1.

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

Yes. The provision of genuinely affordable housing is one of the most critical issues and demand for this, especially socially rented homes, is likely to increase significantly as the economy recovers. Any reduction in the volume of affordable housing compared to current levels is untenable and all efforts should be made to increase these requirements.

Provision should be made on-site wherever possible. This ensures development diversity, provided on a tenure-blind basis and provides much greater benefit than off-site provision or commuted sums.

**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.]**

Where local authorities do not own stock there is no benefit to a 'right to purchase' and therefore the in-kind route is preferred.

**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.]**

Yes, mitigation against overpayment would be appropriate.

**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.]**

It is important that steps are taken to ensure quality. The units should be to the same standards produced elsewhere on the site and should be tenure blind.

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

No. There will need to be serious consideration given to the mechanism by which the IL pot is distributed to infrastructure projects, some of which will be delivered outside the authority (the NHS for example). As noted previously there is a real prospect that the core infrastructure funding ask will outweigh the IL receipt, especially if 25% of the levy is to be passed to the local neighbourhood to spend on their infrastructure priorities which may well sit outside of core projects.

By widening the scope of what the Levy could be spent on the potential for competition and tension over the pot will increase and, as noted above, the reality may well be that there is insufficient funds to deliver the core infrastructure required.

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

Yes. The importance of the provision of affordable housing is such that we cannot risk it being undermined or marginalised by other infrastructure requirements.

**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?**

*Awaiting legal advice*