

**NORTH NORTHAMPTONSHIRE JOINT PLANNING COMMITTEE 28<sup>TH</sup> OCTOBER  
2020 - ITEM 4 APPENDIX A  
PROPOSED RESPONSE TO THE PLANNING FOR THE FUTURE WHITE PAPER**

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Introduction

1. The central premise underpinning the White Paper is that the planning system is failing. The Joint Planning Committee does not believe that this is the case in North Northamptonshire. We have well-established joint working arrangements, with an up-to-date and ambitious Joint Core Strategy (part 1 Local Plan). The Partner LPAs have adopted or are well advanced in preparing their Part 2 Local Plans to provide important local detail. Our high-performing development management teams consistently achieve top-quartile performance, and our design work has been widely recognised as good practice, resulting in our selection for the national 'Future Place' initiative in 2019. This positive planning framework, together with support from Homes England and the Government's Garden Communities Programme, has helped North Northamptonshire to deliver a nationally significant scale of growth. We have an ambition to continue to do this as part of the Oxford-Cambridge Arc.
2. We therefore consider that the focus of the White Paper on deregulating and simplifying the planning system in favour of the development industry is misplaced. Greater attention should be given to creating the conditions for growth through investment in infrastructure, jobs and the environment, and to measures to ensure that the development sector builds out consented sites without delay.
3. There is very little detail on how many of the proposals would work in practice. We recognise that MHCLG is working on this detail and has expressed a desire to work with the development sector and planning authorities to refine the proposals. The response below responds in this spirit by suggesting potential improvements to some of the measures proposed in the White Paper.
4. Our response highlights areas of the White Paper that we support. These include some elements of streamlining local plans, the strong emphasis on design, greater digitisation of planning processes, and a resources and skills strategy for the planning sector. Significant resources will be required to implement these proposals and we welcome the Government's commitment to provide financial support to enable local planning authorities to transition to the new planning system as part of the next Spending Review.
5. Some other elements are supported in principle, subject to further detail being provided. This includes the principle of an infrastructure levy to replace s106 and CIL, provided that this would give greater certainty over funding (preventing renegotiation on the basis of viability), and that it will secure more infrastructure funding and affordable housing than current arrangements. The White Paper has insufficient detail to give reassurance on these important points.

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6. Our response raises some significant areas of concern with the White Paper, including:
- The heavy emphasis on housing delivery and lack of detail of other key elements of the planning system including the response to climate change, environmental protection and enhancement, infrastructure delivery and employment.
  - The simplistic approach to local plans – with just three types of land, and unrealistic timescales given the need to frontload technical work and consultation.
  - The loss of local control and flexibility arising from binding top-down housing requirements and the inclusion of development management policies in national policy (NPPF). The JPC has already raised strong objections to the proposed standard method for calculating local housing need.
  - Abolition of the Duty to Cooperate and lack of information about how strategic, cross-boundary issues should be addressed (through mechanisms such as the Spatial Framework for the Oxford-Cambridge Arc).
  - The White Paper proposes a less regulated system with more permitted development and more Permission in Principle. This has significant resource implications in relation to front-loading technical work and consultation. At the same time, it would reduce income from planning fees and charges.
  - Permission in Principle and other mechanisms for automatic consent would also reduce consultation and democratic input in the development management process. This may be acceptable for small scale proposals, but not for major developments.

Response to consultation questions

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

- No JPC response proposed.

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

- The Joint Planning Committee is the strategic plan-making authority for North Northamptonshire responsible for overseeing the production of the North Northamptonshire Joint Core Strategy (JCS).
- From 1st April 2021, the existing North Northamptonshire Councils will be replaced by the North Northamptonshire unitary authority. The Shadow Executive has responded separately to the White Paper.

*Q3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?*

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- There is no one size fits all for properly engaging with all parts of the community on all aspects of planning. An increased use of social media and digital tools may help to engage with younger people but could be a disincentive to others.
- Given the focus on engagement, particularly within plan-making in the White Paper, it will be essential that LPAs are sufficiently resourced to invest in the necessary technology and undertake these tasks

*Q4. What are your top three priorities for planning in your local area?*

- The strategic priorities for North Northamptonshire are set out in the adopted Joint Core Strategy.

## **PILLAR ONE – PLANNING FOR DEVELOPMENT**

***Proposal 1: The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected.***

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

**No.**

- Support principle of simplifying Local Plans but not sure White Paper proposals would do this.
- LPAs should retain flexibility to produce more than one Local Plan. This would allow LPAs to establish strategic issues, including design frameworks through a Part 1 Local Plan which could set the parameters for more detailed design and policy guidance through additional Local Plans where required.
- Focused, democratically produced regional/sub-regional guidance could help simplify Local Plans.
- 3 zones approach is too simplistic and creates potential for confusion.

***Proposal 2: Development management policies established at national scale and an altered role for Local Plans.***

*Q 6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?*

**No.**

- Some benefit in having national development management policies for consistent approach. Would need suitable consultation on these policies. Unclear from White Paper what scope of these would be.

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- Local Plans should still be permitted to include development management policies to address local priorities.
- Support Local Plans playing crucial role in producing design guidance. Resources will be key.

***Proposal 3: Local Plans should be subject to a single statutory “sustainable development” test, replacing the existing tests of soundness.***

*Q7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?*

**Not sure.**

- Simpler appraisal system may be attractive to reduce delay to plan-making, but replacement mechanism must be robust, particularly if planning to make a meaningful contribution re climate change.
- Legal compliance will still be essential to avoid challenges.
- Concerned about slimmed down delivery test. If growth areas are to be given permission in principle it would be expected that a delivery test would be essential. Without ensuring plans are deliverable their purpose would be significantly undermined, and delivery could be hindered.

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

- There is a need for coordination of planning at a scale larger than local authorities, particularly for infrastructure planning, but to also integrate economic and environmental priorities.
- The new standard method for establishing housing requirements will also mean that many authorities will not be able to meet their own requirements and a mechanism for dealing with this will need to be established. Without this the plan making system could slow down rather than speed up.
- Our preferred approach is for LHN to be determined taking account of the wider context provided by the emerging Spatial Framework for the Oxford-Cambridge Arc, where it can be considered alongside employment provision, strategic infrastructure, and the varying constraints, opportunities, and ambitions across the Arc.

***Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.***

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

**No.**

- This top-down approach to housing requirements removes any local democratic input and does not allow housing to be linked to employment, infrastructure, or constraints (other than those identified nationally).
- A standard methodology provides a useful starting point for setting housing requirements in a Local Plan but should not be binding and it is essential methodology is robust.
- The current proposal for a revised standard method is fundamentally flawed (see our detailed response to Changes to current planning system consultation).
- It is not clear how calculated local housing need will be adjusted to take account of constraints to provide a binding housing requirement.

*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?*

**No.**

- This is a simplistic approach that assumes that affordability issues are due primarily to housing land supply. This is not the case in high-delivering areas such as North Northamptonshire (see detailed response to Changes to current planning system consultation).
- The extent of existing urban areas is a relevant consideration, but is not reflected in the proposed standard method which results in North Northamptonshire having the highest local housing need of any authority in the Ox-Cam Arc (see detailed response to Changes to current planning system consultation).

***Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.***

*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?*

**No.**

- Need to define what constitutes “substantial development” and what will be expected as an ‘outline’ planning permission (detail can vary).

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- Permission in principle could be an acceptable route for small to medium sized growth areas, provided local authorities have sufficient resources to assess sites and provide design guidance at the plan-making stage.
- Significant growth areas such as large sustainable urban extensions or new settlements are likely to provide a greater challenge. The Joint Planning Committee is concerned at the reduced opportunity for democratic input beyond the plan-making stage. Large scale development such as the Garden Communities in North Northamptonshire can take decades to plan and deliver and there must be opportunities for public engagement throughout.
- There are often significant technical information and other issues with stakeholders that need to be discussed and resolved when agreeing any outline application. Planning and implementing complex developments requires skilled input from planning officers and other specialists, which cannot be reduced to a 'tick-box' exercise.
- Permission in principle puts the burden of technical work and consultation on LPAs at plan-making stage but will also reduce fee income from pre-app charges and outline applications. This resource issue needs to be addressed, potentially including charges for promoting sites through the local plan. This will also likely result in increased time required to undertake all the necessary assessment work up front to be certain that permission in principle should be granted. It therefore seems unclear how much of a time saving this will result in.

*Q9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?*

**No.**

- It is considered that there is potential for confusion with the potential approach to renewal areas, and the variety of uses that could be included within these.
- "Protected areas" is a misnomer. Unless conferred by national policy, they would have no additional protection compared to existing designations and planning applications could still be made for any form of development. Should the proposed changes to the standard method be enacted despite our strong objections, the Joint Planning Committee questions whether many areas will be 'protected' given the consequent major uplift in housing numbers.

*Q9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?*

**Yes.**

- New settlements the scale of new towns (10,000 plus dwellings) could be considered through the NSIP regime if a local authority supports the delivery of a new community within its area. However, smaller settlements (e.g. Garden

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Villages) that are not nationally significant should continue to be determined locally.

***Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology***

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

**Not sure.**

- We agree with the majority of proposals to streamline and standardise the application process, however this should not be at the expense of the quality of decision-making. Planning decisions often involve consideration of complex interrelated matters which require professional judgement to weigh up the benefits of a proposal against the harm and standardisation and automated processes runs the risk of removing the ability for full consideration of issues.
- We do not agree with the automatic refund of the planning fee for the application if they fail to be determined within the statutory time limit. Nor do we agree with the proposal for deemed consent outside of the time limit, which would undermine the entire precautionary basis of the planning system. There may be justifiable reasons for delay in a determination, and if the applicant is in agreement with this, the local authority should not be unduly penalised for factors that may well be outside of their control.

***Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.***

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

**Yes.**

- Local authorities will need to be given sufficient resources to be able to have fully digital plans.
- Non digital plans are also still likely to be required.

***Proposal 8: Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so.***

*Q12. Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans?*

**No.**

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- While measures to speed up the plan-making process are welcomed, it is difficult to see how plans for a large area such as North Northamptonshire could be prepared within this time frame, particularly given the proposals to frontload technical work and consultation. A statutory timeframe should not be set until there is greater understanding of the requirements of the proposed system.
- Our response suggests measures to help speed up plan-making.
  - Focused, democratic regional/sub-regional guidance.
  - Flexibility for LPAs to prepare more than one Local Plan
  - Measures to reduce challenges and burdens on LPAs from development industry
  - Consideration for LPAs being able to charge developers for considering sites in Local Plans
  - More clarity on evidence base requirements

***Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools***

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

**Yes**

- Neighbourhoods Plans could be retained under 'sub-areas' and feed into the design process (design code stage) to provide evidence base for new design guides/coding material.

*Q 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?*

- Neighbourhood planning as a process could help inform the production of new design guides and codes for an area as a key consultee/group, with a clear role for neighbourhood planning as part of the design process.
- This is most relevant at the design code level, especially in villages/towns (which could become renewal areas) where there is an existing community.
- Use of digital tools is welcomed and will help share key data and information to a wider audience and encourage active participation.

Local communities will need resources and support to undertake neighbourhood planning, access digital tools and equipment, and periodically review their plans

***Proposal 10: A stronger emphasis on build out through planning***

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

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**Yes.**

- The Letwin Review is mentioned, but its detailed recommendations do not feature in the White Paper proposals. The tone of the White Paper appears to largely blame LPAs for any housing under-delivery.
- Government should look to identify and introduce a range of further measures (both incentives and penalties) to encourage the faster build out of consented land and to prevent developers from land banking and deliberately slowing the release of consented housing land to maximise sales values and/or increase their chances of achieving planning permission for other speculative sites.

## **PILLAR TWO – PLANNING FOR BEAUTIFUL AND SUSTAINABLE PLACES**

*Q15. What do you think about the design of new development that has happened recently in your area?*

- Quality of development across NN varies significantly. NNJPDU monitors housing quality using the BfL12 tool, most recently completed in 2020. Generally, there are some good examples of design quality in housing developments across the area however the majority (over 65%) of development scored 'average' or poor with scope for improvement.
- There is too much scope within the current planning system for developers to drive down quality in order to maximise profit. Recurrent design issues that need to be addressed in the majority of schemes audited relate to lack of connectivity and legibility, poor street scene, lack of character and sense of place, car parking and bin storage.

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

- All aspects of sustainability are important; the priorities will vary depending on individual circumstances. We should be aiming to achieve all aspects.

***Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement and ensure that codes are more binding on decisions about development.***

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

**Yes.**

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- Generally, design guides and design codes are supported as positive tools for encouraging good design and design quality. However, we have a number of key concerns:
  - Significant resources required to meet timeframes (as code creator or client and code compliance checks at DM stage);
  - Link with permission in principle will create pressure to tie down all details (to avoid a free-for-all) but this take significant resource and resulting codes can be too rigid and not allow flexibility over longer periods of time (i.e. larger sites cannot be designed to such detail so early in the process)
  - Developer led codes often watered down and difficult to implement.
  - Code production at outline stage omits a vital stage of the design process
  - Codes need to be prescriptive in their nature and can stifle design creativity
  - Codes need to involve communities/stakeholders (opportunity for integration with neighbourhood plans) however has a significant time /resource implication)
  - The proposal is that weight will only be given to designs and codes in the planning process when community input has been secured. This should be changed to where LPA's can demonstrate they have followed good practice in seeking community engagement, so that LPAs are not penalised if the community do not engage with the preparation of design guides and codes through no fault of the LPA.

***Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.***

*Q18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?*

**Yes.**

- Support on design issues is important but it is unclear why this could not be achieved through additional resources for existing bodies such as Design Council Caba and the network of Architecture Centres.
- Multi-disciplinary in-house capacity and skills are essential for place-making. The proposal for a Chief Officer will help embed design and place-making at the heart of local authority services. However, this will come at a financial cost to LPA's.

***Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.***

*Q19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?*

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**Yes.**

- Any greater emphasis on design quality is welcomed.
- Danger that this will only impact on outcomes from Homes England sites or grant funded schemes.
- Needs to be considered how Homes England, or others, can assist on other private sites where viability issues can affect design quality.

***Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.***

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

**Not sure.**

- It is important that the concept of “beauty” is properly understood (beauty can be read as subjective/visual only).
- The essential ingredients of successful placemaking must be recognised and that design quality is not simply about housing delivery. Great places go beyond aesthetics and visual appearance, encompassing social opportunity/ integration, community, health/wellbeing, economic etc. North Northamptonshire supports Building for a Healthy Life 2020 as a valuable tool in assessing and shaping development proposals.
- Design codes should not become catalogues for pastiche designs; nor should they stifle innovation and creativity in design
- The planning system should not be purely focused on aesthetic beauty but be about ensuring high quality sustainable design. Access to open space is an essential part of this. The energy standards of buildings, space standards and the sustainability of construction materials also needs to be considered.
- Incentivisation through increased permitted development should not be at the expense of LPA budgets or fee income which is already under strain.
- The increased use of permitted development raises concerns over the resulting standardisation of development that may occur to meet the requirements.
- It is assumed that technical details will still be required through the prior approval process, so this may not necessarily result in quicker decisions. Furthermore, this will also require additional resources to consider technical details and it will be critical that LPAs are sufficiently resourced to undertake this work.

***Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.***

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- The intention to ensure that planning continues to protect and enhance the environment is strongly supported as are measures to ensure the planning system promotes the ambitions of the 25-year Environment Plan and net environmental gain.
- It is not yet clear however how this can be achieved within the proposed new system.
- It will be important that the package of proposed planning reform consistently seek to play a role in delivering in mitigating and adapting to climate change and maximising environmental benefits.

***Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.***

- Options which reduce duplication of effort would be supported as would increased use of digital data.
- Additional resources will be necessary in order to undertake this work.

***Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century***

- The review and update of the planning framework for listed buildings and conservation areas is supported. Further information is required to enable us to comment on whether there are new and better ways for securing consent for routine works.
- Capacity and expertise in conservation of historic buildings and conservation areas will be essential to ensure that permission in principle does not endanger heritage assets

***Proposal 18: To complement our planning reforms, we will facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.***

- The ambition for all new homes to be zero carbon at the earliest opportunity is supported. This should be well before 2050 given the previous zero carbon target for housing was 2016. The recognition that all levels of Government have a role to play in meeting the net zero goal is welcomed.
- It is however important to ensure high standards of design and environmental performance for all buildings, not just homes. Of particular relevance to North Northamptonshire are commercial buildings such as warehouses which should also be efficient and where feasible incorporate renewable energy generation.

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- The commitment to net zero should be at the forefront of any planning reform. A more comprehensive approach needs to be embedded at national level (including Homes England strategic objectives) to creating sustainable places and communities, beyond that of 'building beautiful'. Masterplanning for sustainable place-making is integral to this.
- Energy efficiency standards should be minimum standards to achieve compliance, not aspirational targets where developers have scope to negotiate downwards
- It is unclear how the current 'zoning' proposals for Local Plans could assist in radically reducing carbon emissions or respond to the need to adapt to the predicted impact of climate change in terms of flood risk.

### **PILLAR THREE – PLANNING FOR INFRASTRUCTURE AND CONNECTED PLACES**

*Q21. When new development happens in your area, what is your priority for what comes with it?*

- Development needs to be accompanied by all of the necessary infrastructure to support it, and it must be of high quality, sustainable design, meeting local needs and supporting the local economy, alongside maximising environmental net gain and mitigation to climate change.

***Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.***

*Q22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?*

**Yes**

- A simpler, more certain system of ensuring that the infrastructure and mitigation made necessary by development is provided is supported in principle. However, the White Paper provides insufficient detail to reassure the Joint Planning Committee that the new approach will secure more infrastructure funding and affordable housing than current s106 arrangement.
- It is important that any levy reflects local variations in values. In areas where land values are relatively low, some or all of the value generated by the development could be below nationally determined thresholds, and so not subject to the levy. In these circumstances it is difficult to understand how the necessary infrastructure would be provided. This is not acceptable and is a significant concern for parts of North Northamptonshire with lower land values and where

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viability is often cited by developers. Whatever system is introduced must provide local areas with assurance that the infrastructure funding gap will not be increased and that the Government will continue to play its part in funding infrastructure.

Payment of any levy would need to start from the first completion on a site, as this is what drives demand for infrastructure. Any backloading of contributions will widen the funding gap.

*Q22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?*

**It should be set locally.**

- A locally set rate would be more responsive to local circumstances. This would however have greater resource implications for local authorities in setting the rates.
- Consideration should be given to structuring the levy to encourage more sustainable types of development, whilst still meeting infrastructural needs.

*Q22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?*

**More value.**

- The Infrastructure Levy, if introduced, should aim to capture more value to support greater investment in infrastructure, affordable housing and local communities which has historically been underfunded.

*Q22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?*

**Yes.**

**Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights**

*Q23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?*

**Yes.**

- Development provided through permitted development still has infrastructure requirements and should contribute in the same way as other developments. These developments have lower costs associated with obtaining consent and should therefore make an equitable contribution towards infrastructure.

**Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision**

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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?*

**Yes.**

- The proposed changes to the current planning system would conflict with this aim, suspending the requirement for developments of up to 40 or 50 dwellings to contribute to affordable housing provision
- A full range of types and tenures of affordable housing must also be provided which match local needs.

*Q24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?*

- No JPC response proposed.

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

- No JPC response proposed.

*Q24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?*

- No JPC response proposed.

**Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy**

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

**Yes.**

- It should be for local authorities to determine the overall priorities for infrastructure in their area. This would also enable them to adapt to changing priorities and local needs. However, the levy should be ring-fenced to a broad definition of infrastructure (including affordable housing).

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

- No JPC response proposed.

**DELIVERING CHANGE**

**Proposal 23: As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms. In doing so, we**

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PROPOSED RESPONSE TO THE PLANNING FOR THE FUTURE WHITE PAPER**

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***propose this strategy will be developed including the following key elements (these are set out at paras 5.17-5.27 of the White Paper):***

- The recognition that local authorities should remain at the heart of the ambitious reforms is strongly welcomed, as is the recognition that planning departments need to have the right people with the right skills, as well as the necessary resources.
- The planning profession can rise to the challenge and support cultural change, but only if planning services are properly resourced and supported.
- It is proposed in the paper that the cost of the planning system should be principally funded from planning gain, but it is unclear how this would work in the case of preparing Local Plans.

**Proposal 24: *We will seek to strengthen enforcement powers and sanctions***

- Support strengthening of enforcement as a key part of the planning service to ensure that policies are upheld, and developments are carried out in accordance with consents/ permission in principle.

*Q26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?*

- No JPC response proposed.