

## Appendix A : Planning for the Future consultation

Issue/Question	Yes/No	Explanation/Observations
Pillar One – Planning for development		
1. What three words do you associate most with the planning system in England?		<p>It is considered that this is an inappropriately constructed question which trivialises the important role town planning has played in rebuilding England following the end of the Second World War. The continual reforms introduced by various Governments over this time has, however, undermined the ability of local planning authorities to provide certainty to the public, businesses and other organisations in relation to the allocation and protection of land in the public interest. Consequently it could be argued that the existing system has become <u>fragmented, complex, illegible</u>. The consultation does, therefore, represent an opportunity for the authority to highlight the fragmentation and complexity of the current system that has occurred over time to the extent that it's almost impossible to implement a truly plan-led approach. For the public, the end result is illegibility and for developers uncertainty.</p> <p>This has been compounded by a series of incremental legislative and policy changes that have also been undermined by deregulation that hinders the effective delivery of infrastructure provision. For a constrained authority such as Harlow with tight administrative boundaries, the impacts have been very significant and have led to profound social and economic problems.</p>
2. Do you get involved with planning decisions in your local area?		Question for public. Harlow Council is the Local Planning Authority (LPA) for the area.
2(a). If no, why not?		n/a
3. Our proposals will make it much easier to access plans and contribute your views to planning		Question for public, n/a.

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<p>decisions. How would you like to find out about plans and planning proposals in the future?</p>		
<p>4. What are your top three priorities for planning in your local area?</p>		<ol style="list-style-type: none"> <li>1. The allocation of land to meet demonstrable housing needs in the area, both for the market and affordable housing sector, as well as that required for employment needs that will also contribute to the regeneration of the town.</li> <li>2. The protection of key environmental and heritage assets in the district, including the network of Green Wedges and Green Fingers that have shaped the growth of Harlow in a sustainable way, as well providing valuable green spaces for the amenity of local residents and for the protection of wildlife.</li> <li>3. The provision of appropriate levels of infrastructure across the district to meet the needs of existing and future residents, including transport infrastructure which will allow modal shift to be realised.</li> </ol> <p>The above all serve to underpin the delivery of the Harlow &amp; Gilston Garden Town Vision and principles across the wider Harlow area, with our strategic partners to deliver resilient, sustainable development. This will have regard to the authority’s commitment to Climate Change mitigation/adaptation and to deliver net zero carbon by 2050.</p> <p>For Harlow we have just added another corporate priority “Resilience and recovery”. The overriding aim is to create fair, healthy and prosperous communities, which is also reflected in the emerging Local Plan and the HGGT documents, especially the Health and Wellbeing Strategy.</p>
<p><b>Proposal 1: The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – Growth</b></p>		<p>The proposals are silent on Minerals and Waste Planning matter which form part of the “development plan” for the area (S38(6) of 2004 P&amp;CP Act. There also needs to be more clarity on how employment land is treated within the three types of land use proposed.</p> <p>Likewise, the possibility that Neighbourhood Planning groups could be allowed the discretion to use local orders (p 54) needs more thorough evaluation as this could undermine the delivery three types of land growth areas set out in the White Paper and give rise to more uncertainty and duplication.</p>

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<p><b>areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected.</b></p>		
<p>5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]</p>		<p>The current planning system has been undermined over the years by a series of changes that have hindered the delivery of an effective and consistent plan making framework across England and have ignored the synergies between socio-economic and environmental considerations at the national, regional and local levels. This is evidenced in the lack of a framework of adopted, and up to date, local plans across the country, which has been exacerbated by the challenges associated with the obligations of the Duty to Cooperate (although not to agree) that has inevitably promulgated delays in the plan making process, to the detriment of the housing needs of local communities and economic interests of businesses. This is also linked to the need for LPA's to collect meaningful technical evidence to underpin the strategies and policies set out in their local plans, in accordance with the guidance and requirements set out by Government legislation, the National Planning Policy Framework and Planning Policy Guidance.</p> <p>Given the time taken to assemble this evidence, especially where there are clear cross boundary matters that need to be considered, and which necessitates political agreement on outcomes through the DtC, the opportunity to review the process and nature of Local Plans is supported. This, however, is predicated on the need to ensure that any review has regard to the need to take into local circumstances, that enables local nuances to be taken into consideration and addressed through appropriate policies. It is also predicated on the need to see more detail on the proposals.</p>
<p><b>Proposal 2: Development management policies established at national scale and an altered role for Local</b></p>		

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<b>Plans.</b>		
6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?		It is recognised that there may be development management matters that clearly have a national dimension, and indeed some of this is already reflected in the NPPF, that may warrant a national approach e.g. the protection of heritage and wildlife assets, space standards etc. However, there will also be a need to reflect unique local characteristics or needs that may prevail. Consequently any national template of development management policies should also facilitate the provision of evidentially based local policies where this is appropriate and can be justified. We would also want to see a strong ability for local authorities to establish local design codes that would then carry significant weight in the process.
<b>Proposal 3: Local Plans should be subject to a single statutory “sustainable development” test, replacing the existing tests of soundness.</b>		
7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a		<p>The suite of existing tests relating to the preparation of local plans can be both confusing and complex to interpret, especially given the need to balance an often competing range of interests and considerations. However it would be premature to replace existing tests without a thorough evaluation of the risks and potential impacts associated with “simplifying” the existing tests of Sustainable Development in order to reach an informed judgement.</p> <p>It is noted that one proposal involves abolishing the existing Sustainability Appraisal system without giving a clear indication or detail of the environmental safeguards would be put in place, especially as it is stated that such measures</p>

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<p>consolidated test of “sustainable development”, which would include consideration of environmental impact?</p>		<p>would continue to satisfy the requirements of UK and International law and treaties. It is not clear how committed the Government would be to such safeguards, with a concern that long established principles could be prejudiced in the absence of detail. In this respect we would refer to current Defra update on Environment targets and the need for MHCLG and Defra to work more closely together with other Ministries/Departments to deliver resilient, sustainable development for the UK.</p> <p><a href="https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets">https://www.gov.uk/government/publications/environment-bill-2020/august-2020-environment-bill-environmental-targets</a></p>
<p>7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?</p>		<p>It has long been held that the Duty to Cooperate is not a duty to agree, consequently this has been a barrier to effective and timely long term strategic planning across a range of socio-economic and environmental issues. As an alternative to the current Duty to Co-operate arrangements, appropriate sub-regional forums should be established, comprising elected representatives from existing local authorities in order to provide local accountability. These should be based upon functional economic areas that reflect the realistic synergies that prevail rather than on historic and less relevant associations in order to secure meaningful outcomes.</p> <p>It is relevant to note that Government Regional offices, and their previous incarnations, had played an important role in disseminating Government Policy in a clear and unambiguous way as well as acting as a mediator between local authorities to reduce duplication, conflict and avoid gaps in policy coverage.</p>
<p><b>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</b></p>		

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<p><b>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.</b></p>		
<p>8(a). Do you agree that a standard method for establishing housing requirements</p>	<p>NO</p>	<p>A District's housing need and requirement should be set locally based on market signals, constraints, local affordability and past under-provision. A national system cannot cover all local, pressures, needs and desires.</p>

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<p>(that takes into account constraints) should be introduced?</p>		
<p>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?</p>	<p>NO</p>	<p>Affordability goes some way to identify the quantum but should be combined with other factors such as market signals and local studies. The extent of urban areas does not necessarily indicate local pressure for development.</p>
<p><b>Proposal 5:</b>  <b>Areas identified as <i>Growth</i> areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development,</b></p>		

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<p><b>while automatic approvals would also be available for pre-established development types in other areas suitable for building.</b></p>		
<p>9(a). Do you agree that there should be automatic outline permission for areas for substantial development (areas) with faster routes for detailed consent?</p>		<p>This could work in some limited cases, as has happened in Harlow through the use of Local Development Orders, but there is a risk of inappropriate development being automatically allowed. This would therefore necessitate the development of strict and detailed criteria which could result in the process not being much more streamlined than applying for planning permission in the current manner.</p> <p>Harlow has already made good use of existing tools e.g. LDOs, EZs, design codes within the existing discretionary planning system. This can facilitate a more bespoke, nuanced and flexible approach better suited to local needs. In the circumstances it may be better to promote the use of these existing tools before embarking on such significant changes given the current uncertainty both nationally and internationally.</p> <p>The primary aim should be to address the operational context i.e. structure of local government first and ensure that strategic planning is properly restored. In so doing, accountability and transparency would be enhanced and public confidence in the planning system would also increase.</p>
<p>9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?</p>	<p>Yes</p>	<p>We would agree that a fast track process for Renewal areas could be appropriate, provided that there was sufficient control of design quality at the local level.</p> <p>We would agree that development proposals in Protected areas should be subject to the same planning application process as they are now.</p>
<p>9(c). Do you think there is a case for</p>	<p>NO</p>	<p>But there is a case for new settlements to be brought forward under legislation (e.g. a renewed New Towns Act) so that they can be driven through locally. There would need to be very strong and compelling reasons with built in safeguards</p>



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<p>allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?</p>		<p>and rights to challenge by those most affected to introduce a centrally imposed plan.</p>
<p><b>Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology</b></p>		
<p>10. Do you agree with our proposals to make decision-making faster and more certain?</p> <p><b>Proposal 7: Local Plans should be visual and map-based, standardised, based on the</b></p>	<p>No</p>	<p>There is clearly an interest for all parties in the planning process to ensure that decision-making is faster and more certain and there is no issue with that as an objective. However, Harlow Council has concerns about the ability of central government, given its limited resources and other pressures/needs, to roll out large IT projects. In Harlow, the figure of those without digital access is approximately 17% which could exclude many people. We support greater digitisation and are currently working towards that objective ourselves but we have to be mindful that some people could be excluded by this.</p> <p>We would also have concerns about the proposal that planning consent could be automatically granted if there has not been a timely intervention. There should be a review mechanism built into this process.</p>

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<p><b>latest digital technology, and supported by a new template.</b></p>		
<p>11. Do you agree with our proposals for accessible, web-based Local Plans?</p>		<p>Proposals that take advantage of the latest technology to render Local Plans more visually accessible would be supported especially if this encourages more people to be involved in the plan making process. However, there is a false assumption that all members of the community will have access to the latest technology so there is a need, therefore, to ensure that alternative formats are available. This is also important for people to be able to see Local Plans more strategically which is not always easy on a mobile phone or tablet.</p> <p>Some Local Planning Authorities have already have fully interactive Policy Maps to accompany their LPs/DPDs, but this requires considerable resources.</p>
<p><b>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</b></p>		

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<p><b>would be for those who fail to do so.</b></p>		
<p>12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?</p>		<p>The desire to expedite the plan making process is generally understood, however, the ability to achieve a 30 month statutory timescale for plan production will be predicated on the availability of resources to develop the plans, the provision of a credible over-arching plan making framework, and the good will of all those interest groups participating in the public consultation process, including statutory undertakers and utility companies.</p>
<p><b>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</b></p>		
<p>13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?</p>		<p>Not currently applicable for Harlow due to lack of parishes/groups to produce a Neighbourhood Plan.</p>
<p>13(b). How can</p>		<p>N/A</p>

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<p>the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?</p>		
<p><b>Proposal 10: A stronger emphasis on build out through planning</b></p>		
<p>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?</p>	<p>Yes</p>	<p>Harlow Council is supportive of further pressure being imposed to force developers to implement planning permissions, including amending Section 56 of the Town and Country Planning Act to address case law that allows developers just to dig a trench and cover it back over to implement the permission.</p> <p>LGA research indicates that currently there is permission for around a million homes, enough for over three years supply at 300.000 per annum. This suggests the lack of housing is more of a problem with the developers than with the planning system.</p> <p>Existing <b>HMRC</b> guidance, which require certain physical works to be undertaken before a property is zero rated, could perhaps be utilised in the planning system.</p>
<p><b>Pillar Two – Planning for beautiful and</b></p>		

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<p><b>sustainable places</b></p>		
<p>15. What do you think about the design of new development that has happened recently in your area? <i>[Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]</i></p>		<p>The White Paper introduces the concept of “beautiful” places which is a subjective and potentially divisive parameter which could hinder more innovative design solutions being brought forward in communities that have more traditional approaches to the built environment. In high density urban environments, design quality is of paramount importance. Harlow has seen very mixed experiences when it comes to design. Some developments have been of high quality and have won design awards whilst others have been at a very low level of design quality with a primary focus on speed and profit. The variations arise purely at the whim of individual developers and their desires and aspirations with little ability for the local authority to influence them.</p> <p>The key to the success of the White Paper’s proposals to create ‘beautiful places’ will be to ensure that local authorities have the tools to influence design at an early stage and to refuse applications that do not meet agreed local criteria.</p>
<p>16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? <i>[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other –</i></p>		<p>We would question whether there is actually enough in the White Paper on sustainability given the importance of this subject. There is little detail on objectives and what measures will be used to ensure that developers comply with sustainability targets.</p> <p>The development of sustainable modes of transport is a top priority for Harlow Council to be able to accommodate the town’s growth plans. We would also highlight the protection and improvement of our existing green wedge network and an ambitious tree planting programme.</p>

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<i>please specify]</i>		
<p><b>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.</b></p>		
<p>17. Do you agree with our proposals for improving the production and use of design guides and codes?</p>	<p>Yes</p>	<p>Harlow Council supports measures to improve the quality of the built environment through improved production and use of design codes and guides. Over recent years the Council has prompted and secured exemplar designs in schemes across the district, including the award winning Newhall development. It has also an adopted Design Guide and has developed design codes to underpin the successful delivery of local Enterprise Zones. To achieve success in the proposals however it will be essential to ensure that there is genuine local control over the process.</p>
<p><b>Proposal 12: To support the transition to a planning</b></p>		

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<p><b>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.</b></p>		
<p>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?</p>		<p>The Council would generally support a planning system which is more visual and rooted in local preferences and character and in principle a new body to support design coding would be welcome in a role similar to that once provided by CABE. However, it is unclear what the scope of the referred body would be to support this, in terms of its composition and how it would be resourced/funded. Many local authorities already have a Chief Planning Officer, or equivalent, in post, responsible for the discharge of the statutory planning functions of the authority. Such officers normally have a responsibility for design and place-making so it unclear if this is an additional post or a rebranding exercise. The proposals are likely to result in local authorities switching expertise from development management to design and policy. Consideration will need to be given to the training and recruitment of sufficient staff to fulfil these functions.</p>

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<p><b>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.</b></p>		
<p>19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? <i>[Yes / No / Not sure. Please provide supporting statement.]</i></p>	<p>Yes</p>	<p>The role of Homes England needs to focus on design quality as much as housing numbers and funding.</p>
<p><b>Proposal 14:</b></p>		



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<p><b>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.</b></p>		
<p>20. Do you agree with our proposals for implementing a fast-track for beauty?</p>	<p>No</p>	<p>See answer to Q15 which states the Council’s concerns over use of the word “beauty”. High quality development which reflects local character and preferences would be welcomed. In particular, we have a concern that the extension of permitted development rights in Renewal areas for ‘approved designs’ could lead to a series of identikit developments as this will prove an easy option for developers. It will be essential that local authorities have the ability to influence and control these ‘approved’ designs.</p>
<p><b>Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed</b></p>		<p>We would wish to see more detail on the specific proposals on how this can be achieved.</p>

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<p><b>planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.</b></p>		
<p><b>Proposal 16:</b> <b>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.</b></p>		<p>This could be helpful, but we will need to see the detail of how it is proposed to achieve this.</p> <p>Also, see previous answer to Q.7a about partnership working with Defra.</p>
<p><b>Proposal 17:</b></p>		

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<p><b>Conserving and enhancing our historic buildings and areas in the 21<sup>st</sup> Century.</b></p>		
<p><b>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.</b></p>		
<p><b>Pillar Three – Planning for infrastructure and connected places</b></p>		
<p>21. When new development</p>		<p>All of these elements are critical to creating successful and sustainable places and shouldn't be seen as either/or. There needs to be a balanced approach to local plan making that factors in these requirements and then oversees their delivery.</p>

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<p>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]</p>		<p>Social/community and physical infrastructure should be in advance of development or follow in a timely manner.</p>
<p><b>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</b></p>		

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<p><b>nationally-set rate or rates and the current system of planning obligations abolished.</b></p>		
<p>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.]</p>	<p>Not sure</p>	<p>This is a very complex area and it will be important to see that there is a clear process by which a nationally set levy results in that funding being allocated to the local area. We will also want to see what provision there will be for local variations based on infrastructure need, growth aspirations, housing prices etc. and how this will be assessed and delivered. There could be some advantages for all parties in having clarity as to what the levy is and replacing the need for lengthy arguments on financial viability. However, it will be important to see the detailed mechanism to ensure that this clarity is delivered.</p> <p>It is also important to set reform alongside an evaluation of the taxation system. Landowners will be unwilling to bring forward land for development where the margins are too low. In addition, the 2019 NPPF (paras 57 and 122) has emphasised the importance of assessing viability and local market conditions at the plan making stage.</p> <p>More fundamentally, the discretionary nature of the British planning system has been a key factor in helping the obligations policy to succeed and has allowed local negotiations to proceed on a case by case basis depending upon market conditions and the prevailing local policy background.</p> <p><a href="https://housingevidence.ac.uk/wp-content/uploads/2019/12/191212-capture-inc-in-land-value-TC.pdf">https://housingevidence.ac.uk/wp-content/uploads/2019/12/191212-capture-inc-in-land-value-TC.pdf</a></p> <p>Sir Peter Hall Award Winner for Planning Research Excellence 2020 A. D. H. (Tony) Crook and Christine Whitehead (2019) 'Capturing development value, principles and practice: why is it so difficult?' Town Planning Review, 90(4) pp 359-381 <a href="https://doi.org/10.3828/tpr.2019.25">https://doi.org/10.3828/tpr.2019.25</a></p>
<p>22(b). Should the Infrastructure Levy rates be set nationally at a</p>		<p>Whatever system is chosen it will be essential that there is some accounting for local infrastructure needs, delivery costs and sale values. We would however support a fixed locally set rate.</p> <p>Rates could be adjusted to reflect the scale of the proposals to allow smaller building firms to capture a greater</p>

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<p>single rate, set nationally at an area-specific rate, or set locally?</p>		<p>percentage of the market This was an objective set out in the Housing White Paper – Fixing our broken housing market.</p> <p>Previous research carried out for MHCLG and published in March 2018 has highlighted the sensitivity of the development industry to policies on developer contributions and how variations in their enactment effects developer decision making. These specific costs can vary significantly even between neighbouring LPAs and the merits of setting costs across a larger than local area e.g. on a county-wide basis, merit further consideration.</p> <p>The research also stated that many developers regard a LPA’s general ‘planning culture’ as a significant determinant of where they chose to do business. In this respect how planning obligations were handled – openness, willingness to consider proposals and viability assessments, manner of engagement, transparency of negotiating practices – were understood by some as a good test of the climate in an LPA and how easy it might be to do business in that area. This emphasises the importance of an adequately resourced planning service.</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685301/Section_106_and_CIL_research_report.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685301/Section_106_and_CIL_research_report.pdf</a></p>
<p>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?</p>		<p>Ideally we should seek to capture higher value given the deficits in infrastructure funding and the shortage in the delivery of genuinely affordable housing. However, given the prevailing uncertainty related to Brexit, the pandemic and the recession, the prospect of capturing more value at this time may be difficult to achieve whilst maintaining delivery.</p>
<p>22(d). Should we allow local authorities to borrow against</p>	<p>Yes</p>	<p>This is likely to be essential given that trigger points for releasing Infrastructure Levy are likely to be throughout the lifetime of a development and probably weighted towards the latter phases. If we are to secure early delivery of infrastructure and other community benefits then the ability to borrow against future receipts will be important.</p>

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<p>the Infrastructure Levy, to support infrastructure delivery in their area?</p>		<p>However, there will be questions as regards liabilities if developers default on payments, or go into liquidation before all contributions have been paid. A local authority could have borrowed large sums of money against these future receipts which may not be forthcoming. Will there be Government guarantees in relation to any borrowing?</p>
<p><b>Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights</b></p>		
<p>23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?</p>	<p>Yes</p>	<p>We very strongly agree with this given the scale of permitted development schemes in Harlow that have made no contribution towards local infrastructure despite causing significant impacts upon local health and education provision in particular. However, we would argue that this requirement should not need to wait for a new national levy via the changes to the planning system and Government could now require all permitted development schemes above a certain size to make infrastructure contributions.</p>
<p><b>Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision</b></p>		

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<p>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?</p>	<p>YES</p>	<p>But, ideally affordable housing should be maximised to meet the affordable housing need in a district and not just based on current rates of contribution.</p>
<p>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?</p>	<p>NO</p>	<p>Whilst there is an imperative to meet the affordable housing need this should not be at the expense of providing infrastructure, both are important and both open to negotiation with the developer and policy compliance. It is important that the provision of affordable housing is not just limited to market discounts on house purchases but also prioritises the ability to provide both social and affordable rent options.</p> <p>Harlow Council has a corporate priority to develop more affordable housing and in particular socially rented housing. We have chosen to allocate more land for housing that the objectively assessed need requires to enable the town to achieve its demonstrable need for affordable housing. We would object to proposals that saw developer contributions prioritised for First Homes over the provision of other tenures of affordable housing, particularly affordable and social rented homes.</p>
<p>24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?</p>	<p>YES</p>	



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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	Adherence to Local Plan design policy with design codes for affordable housing that at least match those for private housing.
<b>Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy</b>		
25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?	YES	Whilst there is a desire to provide confidence and clarity to developers, local authorities absolutely must have the ability to determine how the Infrastructure Levy is spent locally.
25(a). If yes, should an affordable housing 'ring-fence' be developed?	YES	Need the flexibility to fund infrastructure and local needs, but also want to ensure the provision of affordable housing.
<b>Delivering</b>		

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<p><b>change</b></p>		
<p><b>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</b></p>		<p>The implications for the delivery of undergraduate and post graduate planning courses have to be explored with Universities and the professional body who accredit these courses.  <a href="https://www.rtpi.org.uk/become-a-planner/study-at-university/">https://www.rtpi.org.uk/become-a-planner/study-at-university/</a></p>
<p><b>Proposal 24: We will seek to strengthen enforcement powers and sanctions</b></p>		
<p>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</p>		<p>This would be considered through Equality Impact Assessments.</p> <p>However, this issue should have been considered <b>before</b> the consultation was issued and included in an assessment published alongside the consultation.</p> <p>Consultations must be as widely accessible as possible, including physical exhibitions of proposals, clearly written documentation in different formats and legible digital displays for both text size and contrast. See Guidance: Accessible communication formats available at <a href="https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats">https://www.gov.uk/government/publications/inclusive-communication/accessible-communication-formats</a></p>

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149 of the Equality Act 2010?		
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