

Wantage and Grove Campaign Group



Planning for the Future 2020

Dear Sir/Madam

This is our submission to the consultation on Planning for the Future 2020.

Introduction

1. This submission covers the following points:
 - 1.1. Information about the Wantage and Grove Campaign Group
 - 1.2. Our response to the Consultation on Planning for the Future.
 - 1.2.1. Overview
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Information about the Wantage and Grove Campaign Group

2. We are the Wantage and Grove Campaign Group, a non-party-political group of over 1000 individuals who live in and around Wantage and Grove (mainly in the OX12 postcode area) in Oxfordshire. We are not against any development in Wantage and Grove but:
 - 2.1. Developments should be proportionate and sustainable; and
 - 2.2. The infrastructure should enhance and improve quality of life for its residents.

Our response to the Consultation on Planning for the Future

3. We believe that while the proposal promises a completely new planning system which is “simpler, clearer and quicker to navigate”, in fact the published proposals would undermine local democratic control and give developers and land-owners unprecedented influence over what is built where.
4. Localism is a word which appears many times in the document but housing numbers will be imposed centrally and national policies and design codes will be imposed. So where will the local input come? And how much will be actually listened to?

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Under the new proposals there will be “meaningful public engagement at two stages”, the first of which is in parallel to submissions from developers with no specific opportunity for communities to comment on these submissions and the second of which is in parallel to the submission to the Secretary of State and therefore gives little opportunity for negotiation or discussion. This is not what we call localism or local community involvement.

5. We support the proposal from the Local Government Association for councils to be given the powers and tools to deliver a programme of 100,000 social homes a year, which would not only meet a third of the Government’s housing target, but reduce homelessness, get rough sleepers off the streets and support people’s wellbeing. We believe that this will also mean stopping the right to buy scheme and believe that the Government’s shared ownership scheme means that the right to buy scheme has been superseded.
6. The Secretary of State for Housing, Communities and Local Government suggests that the new proposals will cut red tape but not standards. Standards have already been cut – new homes built since 2010 are smaller, further from local facilities, have less green space and are further from jobs than ever before. Any new proposals need to set in place policies which reverse this trend.
7. In practice sustainable land use planning involves complexities which just cannot be over-simplified in order to realise a housing target or a developer’s margin. If we gloss over these complexities, we could still end up with more households at risk of flooding, households with limited access to public transport and minimal accessible green space and socially isolated housing. A real danger here is that the quality of development, and housing in particular, is sacrificed in order to increase the pace of development. (It remains questionable as to whether the pace of decision making itself is actually the issue).

Questions

Pillar One – Planning for Development

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

1.1. Very much **DEVELOPER-LED**

1.2. Housing numbers **IMPOSED** by Government

1.3. Constantly **CHANGING** with Government tweeks and amendments

Q2. Do you get involved with planning decisions in your local area?[Yes / No]

2.1. Yes we do get involved with planning

(a). If no, why not?

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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?
[Social media / Online news / Newspaper / By post / Other – please specify]

3.1. Other

All media are important but public meetings and face to face contact with local councillors are very important ways for the local residents to understand what is being imposed on them. Council websites can provide information but only if you know to look so “push” is important – via posters on lampposts, post to individual homes and through well-advertised public events.

Q4. 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]

4.1. All of these things are important but our top three must be:

- 4.1.1. **More or better local infrastructure** – built in a timely manner, building a new school after 1000 homes have been occupied is far too late. Infrastructure must be built before or at least as homes are built.
If recent research is accurate (and we believe it is) ensuring that all new homes are built within a 15 minute walk of basic facilities including a significant green space or park and that homes, facilities, and green spaces should be linked by connected, walkable, and green streets; cycling infrastructure is also very important
- 4.1.2. **Increasing the affordability of housing** – Oxfordshire has a huge problem with a lack of truly affordable housing. Social rent and housing which can be afforded for those on incomes close to the minimum wage are very important to ensure that key workers (including nurses, teaching assistants, carers and emergency workers) can afford to live close to where they work.
- 4.1.3. **The environment, biodiversity and action on climate change** are also important – building homes near to employment, schools, health services and leisure facilities to encourage cycling and walking and to minimise the need for private vehicles and public transport. Ensuring the all development is zero carbon is also very important as is ensuring that environment and biodiversity are protected or enhanced. Green spaces as well as the Areas of Outstanding Natural Beauty must be protected and spacious greenways developed (especially if more people are working from home and having to social distance in the future).

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Q5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not Sure]
Why?

5.1. No

- 5.1.1. We do not think that the White Paper proposals will improve the planning system or make it more fit for the future.
We believe that it is central government who are mainly responsible for the current housing problems. Despite there being planning permissions for more than a million houses, houses remain unaffordable in many areas. Developers buy land which is valued based on the prices in the local area and do not build unless they are confident that they can sell at that price. Developers don't build houses that they can't sell. New houses tend to be priced slightly higher than local prices, so prices are not reduced by building more new houses and affordability is not changed.
- 5.1.2. It is not planning that is to blame for current affordability problems. The government has funded several schemes supposedly to reduce prices. These changes increase the ability of people to pay for housing. Developers know that and so they push up prices to absorb the funding and make more profits.
- 5.1.3. We were told (by the Secretary of State for Housing at the time, Nick Boles) that the NPPF would sweep away thousands of pages of legislation and replace them by a simple 50ish page document which would radically simplify the planning law of the country. Yet in the White Paper the Government describe this process as 'planning decisions' that 'are discretionary rather than rules-based'. The Government's proposals are for a rules-based system where they say, 'communities can have confidence those rules will be upheld' and so can the developers.
Decisions are not 'discretionary'. Decisions on particular applications are based on the law, government guidance, precedent, local circumstances such as flood risk, AONB and Green Belt and the local plan and its policies. Local plans and their policies are based on the law, government guidance, the results of extensive local consultation, liaison with neighbouring authorities, infrastructure providers, land owners and an examination in public, followed by an inspector's report.
- 5.1.4. The Secretary of State for Housing, Communities and Local Government suggests that we are moving away from notices on lampposts to an interactive and accessible map-based online system. Planning has been online for a number of years in most communities and this disenfranchises those who do not have access

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to the Internet or social media. The new proposals will also disenfranchise those who find a map-based approach difficult to understand.

- 5.1.5. If Local Plans are the only way that local communities can get involved with the planning process then it is very important that consultation is meaningful and results in amendments. Too many times we have seen plans produced and lip-service paid to consultation with changes suggested by the community being ignored or overruled by planning inspectors.
- 5.1.6. The proposal is that areas that are “protected” and justify more stringent development controls would include “important areas of green space”, “areas of open countryside outside of land in Growth or Renewal areas. Some areas would be defined nationally, others locally on the basis of national policy”. Once again this suggests that much more of the planning process will be dictated from the central government. Does this mean that small unimportant areas of green space (which may be a key breathing space for local communities) but might be big enough for a developer to build a few homes would not be protected?
- 5.1.7. The proposal appears to be that the entire country can be colour-coded into three categories (although there is a suggestion that there could be a more binary model?). This does seem very simplistic and the “alternative approach ... to limit automatic permission in principle to land identified for substantial development in Local Plans (Growth areas); other areas of land would, as now, be identified for different forms of development in ways determined by the local planning authority (and taking into account policy in the National Planning Policy Framework), and subject to the existing development management process” does seem to allow more flexibility.

Q6. 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]

Why?

6.1. No

- 6.1.1. The introduction states that the planning reforms since 2010 “have democratised and localised the planning process by abolishing the top-down regional strategies and unelected regional planning bodies,” yet the new proposals include “general development management policies” set nationally and “a new nationally determined, binding housing requirement that local planning authorities would have to deliver”. This suggests that localism is dead and that much more of the planning process will be dictated from the central government taking even more power from local authorities.

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6.1.2. We are concerned about the proposal to “move to a position where all development management policies and code requirements, at national, local and neighbourhood level, are written in a machine-readable format so that wherever feasible, they can be used by digital services to automatically screen developments and help identify where they align with policies and/or codes.” We do not believe that planning can be automated. Details are important and can make a difference to whether a development can become part of an existing community or will remain isolated. Roads which appear accessible on maps may be unsuitable for the volume of traffic.

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?

[Yes / No / Not Sure]

Why?

7.1. No

7.1.1. The proposal is that “plans should be informed by appropriate infrastructure planning, and sites should not be included in the plan where there is no reasonable prospect of any infrastructure that may be needed coming forward within the plan period.” The plan period is usually 15 years. Schools, health, transport and leisure facilities need to come forward when the residents move in – not 10-15 years afterwards.

In 2017 Oxfordshire Growth Board (comprising all six Oxfordshire Local Authorities) admitted that there was a £8.5 billion funding gap for the necessary infrastructure to support planned housing growth to 2040. This was only an estimate of capital delivery costs and did not include the additional annual running and maintenance costs. It also didn’t include any funding for community infrastructure such as community centres, leisure facilities and libraries. So how does the Government plan to ensure that funding gaps like this are met?

7.1.2. The White Paper proposes to abolish the Sustainability Appraisal system and develop a simplified process for assessing the environmental impact of plans, which would continue to satisfy the requirements of UK and international law and treaties. Surely the future of our country is not limited to satisfying the requirements of UK and international law? If we are to “ensure new development brings with it the schools, hospitals, surgeries and transport local communities need, while at the same time protecting our unmatched architectural heritage and natural environment” as explained in the introduction, then the sustainability appraisal must cover these aspects.

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- 7.1.3. We have no clarity about what the “consolidated test of sustainable development” would mean in practice. We have found that the definition of sustainable development used in planning is predominately an economic one and doesn’t include accessibility (the 15 minute walk to access facilities such as shops and green space), moving to zero carbon, space standards, or focus on the environmental assessment.
- 7.1.4. As proposals 15, 16 and 17 describe, the reformed system should play a proactive role in promoting environmental recovery and long-term sustainability. In doing so, it needs to play a strong part in our efforts to mitigate and adapt to climate change and reduce pollution as well as making our towns and cities more liveable through enabling more and better green spaces and tree cover. It must take advantage of opportunities for environment improvement and conserve our heritage assets (views, conservation areas, listed and historic buildings and World Heritage Sites).
- 7.1.5. Proposal 18 is absolutely crucial to meeting our climate change obligations and high standards for the environmental performance of developments must be implemented as quickly as possible and applied retrospectively to those 1,000,000 dwellings already approved but not yet built.

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

Why?

- 7.2.** We are not sure what the difference is between the current Duty to Cooperate and the proposal that “it would be possible for authorities to agree an alternative distribution of their requirement in the context of joint planning arrangements. In particular, it may be appropriate for Mayors of combined authorities to oversee the strategic distribution of the requirement in a way that alters the distribution of numbers, and this would be allowed for.”
- 7.3.** The only solution is some form of strategic planning authority similar to the old regional authorities, but NOT the current Local Enterprise Partnerships. Our experience is that the LEPs are unelected quangos which focus almost entirely on the economic growth of a region to the exclusion of all other factors which affect the local communities and the environment in which they operate.
- Strategic planning advisory bodies (SPABs) must include some form of public participation. Provided they have democratic legitimacy, strategic planning has a key role to play: in providing high quality homes in well-planned communities; in securing sound infrastructure when it is needed; in promoting health and well-being; in protecting and encouraging biodiversity; and in combating climate change.

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- 7.3.1. All the parties on SPABs would together set out a long-term vision for the area that joins up economic, infrastructure health, and environmental aims with housing. These would pinpoint where growth is to take place and what type of employment is needed; playing an enabling role for reshaped town centres and local economies post-coronavirus, while balancing health and environmental factors.
- 7.3.2. SPABs would produce a 'strategic integrated framework' – setting out what infrastructure is needed to accompany development in each area, identifying what areas need to be connected to improve growth and create new jobs, alongside addressing climate change issues. These frameworks would then provide a basis for local plans.
- 7.3.3. With councils facing huge shortfalls in infrastructure funding set against projected housing development, a 10-year delivery plan should be produced alongside the framework on how to unlock infrastructure funds: this could be a 'whole is greater than the sum of its parts approach' by pooling together councils' resources to unlock large-scale infrastructure projects, whilst enabling more private and public investment due to having a long-term shared vision outlined in each area.

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

[Yes / No / Not Sure]

Why?

8.1. No

- 8.1.1. The basic premise on which these proposals are based is that developers will build enough to reduce the prices and improve affordability. This is blatantly untrue. Developers are focused on providing shareholder capital improvement and this can only be achieved by increasing the profitability of the business overall. They will continue to restrict supply to maintain prices and hence profitability. This has been clearly demonstrated over the last 10 years yet Government is continuing to ignore the evidence.
- 8.1.2. Any standard method should be adjusted to take account of the permissions granted but not built. Land banking can be a significant factor when looking at the housing potential for an area. It provides a means for developers to influence the figures by not using existing permissions to encourage the allocation of more land.
- 8.1.3. More than 1,000,000 homes have already been granted planning permission and are not being built, not because of problems with the planning system but because developers maintain prices by restricting supplies of new homes.

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- 8.1.4. No mention is made of any regard being given to the requirement for land to be preserved for agriculture. To meet the climate change requirements it is essential that land is used to grow as much of our food as possible, yet no mention is made of land being used for anything other than development.

(b) Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

Why?

8.2. No

- 8.2.1. The statement that “affordability of homes is the best evidence that supply is not keeping up with demand” is only true because developers are restricting supply to maintain prices and profitability. High house prices mean that developers are ensuring a return for their shareholders by restricting supply.
- 8.2.2. The existence of existing urban areas is no guarantee that additional development could, or should be accommodated. Bad design in the past should not be exacerbated and attention needs to be paid to the relationship between the location of homes, jobs, services, travel (including active travel) and flood-risk alleviation – which should be central to good planning.
- 8.2.3. Simply basing a housing figure on a percentage of the current housing stock seems to be a very blunt instrument and assumes that saturation of an area cannot be reached. It also takes no account of the employment potential in the area. For example, the closure of a large employer would mean that the housing need may decrease in an area.

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

[Yes / No / Not Sure]

Why?

9.1. No

- 9.1.1. The proposal is that sites annotated as “Growth areas” would have the equivalent of outline approval for development. Our experience of outline approval being given to development of 1,500 or 2,500 homes means that the design standards for roads, footpaths, cycle ways, infrastructure and green space apply at the date that outline permission is granted even though the construction may not take place for 10-20 years. In that time the design standards may change dramatically (widths of footpaths and cycleways, for example, or the introduction of greenways) yet the

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development will be built out to the standards agreed at outline meaning that the development will be very out of date by the time it is built.

- 9.1.2. If Local Plans are only going to be written every 10-15 years and outline permissions granted when the plans are made, standards for building (thermal efficiency, space standards etc) will be set when the local plan is approved, not when the reserved matters approval is granted. This does not provide the opportunity for latest standards to be met (or at least provides the opportunity for developers to meet the older and less costly standards).
- 9.1.3. 89% of planning applications for new housing are determined within 13 weeks or the time agreed with the applicant. These results echo the findings of the Letwin review 2018 and past reports from parliamentary select committees but the White Paper makes no reference to them. So we see no reason why applications cannot continue to be brought forward in the current manner.
- 9.1.4. There is also a proposal that there will be “a requirement for each planning authority to review its Local Plan at least every five years”. Clarity needs to be given to whether the Planning Authority has the ability to amend the standards applied to developments in “Growth areas” in this review to ensure that latest standards are applied.

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

[Yes / No / Not Sure]

Why?

9.2. No

- 9.2.1. The proposal that for pre-specified forms of development such as the redevelopment of certain building types, consent would be granted through a new permission route which gives an automatic consent if the scheme meets design and other prior approval requirements based on a limited set of form-based development types is another example of centralising power of development and undermining local democratic involvement in and control of development.

(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]

Why?

9.3. No

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- 9.3.1. The proposal in the paper seems to be that “Growth Areas” could include land suitable for comprehensive development, including new settlements and urban extension sites. Given the level of infrastructure required for a new settlement it would need to be a key part of a strategic plan for a region and should not be imposed under the Nationally Significant Infrastructure Projects regime.
- 9.3.2. Obviously national funding would be required to support such a development but the proposal should be driven locally not nationally if the Government is not to be accused of more centralisation of power.

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

[Yes / No / Not Sure]

Why?

10.1. No

- 10.1.1. Whilst we applaud the aspiration to make greater use of digital technology, it remains questionable as to whether the pace of decision making itself is actually the issue. Our experience is that developers often fail to meet the relevant design standards and have to amend applications, rather than any problems within the local planning authority. Sustainable land use planning involves complexities which just cannot be over simplified in order to realise a housing target or a developer’s margin.
- 10.1.2. We believe that digitisation should be a means to complement, rather than replace, existing approaches to planning. The increased reliance on digital systems for decision making could lead to a tick-box approach to development which may oversimplify many issues.
- 10.1.3. Local authorities and communities need to be able to challenge poor developer applications which are driven by profit rather than housing needs.
- 10.1.4. The suggestion that there should only be one key standardised planning statement of no more than 50 pages to justify the development proposals seems a little naïve; surely this should vary with the complexity of the application and a major application for an urban extension or a new settlement will require much more detail than a simple development of 50 new homes.
- 10.1.5. The proposal is that applicants will be entitled to an automatic rebate of their planning application fee if they are successful at appeal. Should it not be balanced such that if an appeal is rejected there should be some recompense to the Planning Authority?

Wantage and Grove Campaign Group Comments - continued

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

[Yes / No / Not Sure]

Why?

11.1. No

11.1.1. It is important that all of the local community can access Local Plans and have the opportunity to participate in their development. In the recent pandemic we have found that many families do not have access to the Internet at home and would propose that documents can be accessible via other means as well as digitally to ensure full participation. Conversely we often find that meetings (both physical and virtual) need to be organised at times which allow all members of the community to participate and which do not penalise any one sector of the society.

11.1.2. The use of 3D visualisations and other such tools are unlikely to support good community engagement unless they are accessible to all.

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

[Yes / No / Not Sure]

Why?

12.1. No

12.1.1. No explanation of analysis of why plans take a long time to finalise is given. Our local experience is that plans have been delayed because changes to legislation and national guidance have meant a significant amount of rework has been required and further consultations necessary. We do not know if this is representative.

12.1.2. In the past plans generally go through at least three consultation periods each of which should be open for at least 6 weeks and cannot take place in the "purdah" around any election of public officials.

Under the new proposals there will be "meaningful public engagement at two stages":

12.1.2.1. The first public engagement will take place at the beginning in parallel to site submission. When developers submit sites late during this period there could be little time for input from the community. We look forward to seeing what "comprehensive best in class ways of achieving public involvement at this plan-shaping stage for where development should go and what it should look like" will be in practice and hope that this "best in class" public involvement is in place when the time deadlines are enforced.

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12.1.2.2. The second consultation will take place in parallel to the submission to the Secretary of State – how can this be meaningful if the plan has already been submitted?

12.1.3. If the plans have to include sufficient detail for the equivalent of outline permission on at least all “Growth” areas then the initial consultation period may not be sufficient and further engagement with the community would be required. Feedback has to be provided with explanation of why decisions have been (or not been) amended and all of this takes time.

12.1.4. 30 months may be very optimistic.

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

[Yes / No / Not Sure]

Why?

13.1. Yes

13.1.1. Neighbourhood plans should be an important part of the planning system but care should be taken to make sure that the imposition of policies from Central Government do not disenfranchise communities as neighbourhood plans will be left with few if any decisions to take.

(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?

13.2. Neighbourhood plans need to be led by experienced practitioners both in the use of digital tools and in planning law and guidance. These people are not always available.

13.2.1. The key components to a neighbourhood planning process are local involvement, listening to local views and being able to introduce policies and proposals that work and are effective.

13.2.2. It is not clear how the neighbourhood planning process would interact with the new Zoning system. Given the length of time plans can take to develop, and the intention to prepare Local Plans within 30 months, considerable care needs to be taken to ensure that large numbers of neighbourhood plans are not rendered invalid overnight. This would seriously jeopardise public involvement in the neighbourhood planning process

Wantage and Grove Campaign Group Comments - continued

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?

[Yes / No / Not Sure]

Why?

14.1. Yes

14.1.1. We believe that there should be a time limit on the timeframe in which a site has to be started and that a low and high rate of build should be part of the approval. No build or simply digging a trench then leaving the site should not be acceptable. If a minimum build rate is included in the application then more permissions might turn into homes rather than land banks.

14.1.2. The white paper proposes “to make it clear in the revised National Planning Policy Framework that the masterplans and design codes for sites prepared for substantial development (discussed under Pillar Two) should seek to include a variety of development types by different builders which allow more phases to come forward together”.

Our experience of a development of 1,500 homes where there are currently three developers building on four phases is that the buildout rate is no greater than on another development of 2,500 homes where two parts of one developer are building three phases. So we are not sure of the value of this proposal.

14.1.3. As the equivalent of outline permission will be granted on all developments in the “Growth Areas” when the plan is made, the Masterplan for the site should already be in place and there should be no reason why developers could not work in parallel. The only issues relate to the development of site-wide infrastructure such as drainage, roads etc. which must be funded and developed early to allow the building of different phases.

Pillar Two – Planning for Beautiful and Sustainable Places

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

[Not sure / indifferent / Beautiful / well-designed / Ugly / poorly-designed / There hasn't been any / Other (please specify):]

15.1. Other

15.1.1. Smaller developments (less than 85 homes) have been well designed. Larger developments (more than 90 homes) tend to be very formulaic and built to a price rather than a design.

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15.1.2. Beauty is in the eye of the beholder and a new home will generally seem beautiful to the person who has bought it. To those whose view has been lost or favourite green space built on, the development will always be ugly. Thousands of identical little boxes are unlikely to be beautiful but could be well-designed. Unfortunately they rarely are.

Q16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green/open spaces / Energy efficiency of new buildings / More trees / Other (please specify):]

16.1. Other – more (and timely) infrastructure

16.1.1. As almost all sites allocated in our Local Plan already have outline permission it is too late to influence sustainability significantly on these developments. They are at least 8 miles from the nearest major employment sites, have the statutory amount of green space, are built to existing (low) efficiency standards and have agreed landscape plans.

Since 2010 approximately 2000 homes have been built in our area (26% growth) but no improvements have been made to roads, health services or community facilities. We have received one new cycleway and one new primary school and improvements to tennis courts but other infrastructure has not yet been delivered.

16.1.2. Bus services have reduced, green spaces on new developments are late and promised improvements to leisure facilities have been withdrawn.

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

[Yes / No / Not Sure]

Why?

17.1. Yes

17.1.1. Design Guides are very important but should be viewed as a minimum requirement and developers should be encouraged to go further than the minimum standards.

17.1.2. Local design guides are very important to give a local twist to the style of development and as far as possible ensure that the standard layouts and designs provided by volume developments are tailored for the local area.

Wantage and Grove Campaign Group Comments - continued

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 / No / Not Sure]

Why?

18.1. Not sure

18.1.1. Design guides are already in use in our local planning authority. A new body might be unduly prescriptive and limit local choice.

18.1.2. A chief design and place making officer may be useful in giving priority to these issues although it is important that not all developments in the local area fall into identical designs. It should be within a local authority's discretion as to how best to fulfil the tasks required, rather than being prescriptive over a job title.

Q19. 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]

Why?

19.1. Yes

19.1.1. It is important that the Government is seen to lead by example and giving a greater weight to design quality and environmental standards would be a positive step.

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

[Yes / No / Not Sure]

Why?

20.1. Not Sure

20.1.1. Beauty is in the eye of the beholder and a new home will generally seem beautiful to the person who has bought it. To those whose view has been lost or favourite green space built on, the development will always be ugly. We aren't sure what the difference is between a "fast-track for beauty" and a well implemented local design guide.

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?

[More affordable housing / More or better infrastructure (such as transport, schools, health) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other (please specify):]

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21.1. All of the above

21.1.1. New development must include social rental properties and truly affordable housing, more infrastructure, good design incorporating active travel, homes which have space for home working and green space.

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 / No / Not Sure]

Why?

22.1. No

22.1.1. The Section 106 planning application and the Community Infrastructure Levy work reasonably well although they are not sufficient to fund all of the infrastructure necessary for the residents of any new development. The New Homes Bonus used to be available to make up the difference.

22.1.2. There are also problems with the proposals for developer contributions. The Prime Minister suggests that the new proposals will make it harder for developers to dodge their obligations to improve infrastructure. Yet the proposal that the levy would be charged on the final value of a development gives us significant cause for concern as over the years we have seen several examples of developers going into administration or bankruptcy towards the end of the development and not providing the levy or infrastructure included in the original agreement. Could an estimate be made of the amount required and the sum be placed in bond at stages during the development, with the final sum being agreed at the end?

22.1.3. If some local authorities have chosen not to introduce the Community Infrastructure Levy out of concern for the impact on viability of development why couldn't this be charged only above a set threshold (as proposed for the new Infrastructure Levy) so that these impacts would be mitigated?

(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]

22.2. Locally

22.2.1. The requirements for infrastructure and the land value uplift vary by area and so a nationally set rate doesn't make sense.

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(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]

22.3. More value

22.3.1. We support the proposal that the Government could also seek to use developer contributions to capture a greater proportion of the land value uplift that occurs through the grant of planning permission, and use this to enhance infrastructure delivery.

22.3.2. Greater investment in infrastructure, affordable housing and local communities is needed from developers – but also from government in the form of direct investment.

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

[Yes / No / Not Sure]

Why?

22.4. Yes

22.4.1. We also support the proposal to allow local authorities to borrow against Infrastructure Levy revenues so that they could forward fund infrastructure, but we believe that developers should pay stage payments at various points during the development to help ensure development can be completed faster.

22.4.2. We do not believe that enabling borrowing combined with a shift to levying developer contributions on completion would incentivise local authorities to deliver enabling infrastructure. Why would borrowing incentivise them? Surely communities and developers can encourage local authorities to deliver the infrastructure.

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

[Yes / No / Not Sure]

Why?

23.1. Yes

23.1.1. The suggestion is that the scope of the Infrastructure Levy would be extended to better capture changes of use which require planning permission, even where there is no additional floorspace, and for some permitted development rights

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including office to residential conversions and new demolition and rebuild permitted development rights. This approach would increase the levy base, and would allow these developments to better contribute to infrastructure delivery and making development acceptable to the community. We agree that this would be a good approach.

23.1.2. Why maintain the exemption of self and custom-build development from the Infrastructure Levy – if every other application for planning has to pay then why not self and custom build?

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 / No / Not Sure]

Why?

24.1. Yes But

24.1.1. We support the provision of affordable housing but believe that the need for social housing is as significant as the need for affordable homes to purchase.

Many people on low incomes or zero hours contracts will never be able to buy a home and will rely on social housing. Local Councils have estimated that there is a need to build up to 100,000 social housing units per year and given the post covid world that we may eventually move towards, this need will only increase with higher levels of unemployment.

24.1.2. Affordable homes must be affordable for the local area not affordable at national levels and the affordability should be linked with income levels not a percentage of market values.

(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]

Why?

24.2. Not sure

24.2.1. We support the alternative option to "introduce further requirements around the delivery of affordable housing. To do this we would create a 'first refusal' right for local authorities or any affordable housing provider acting on their behalf to buy up to a set proportion of on-site units (on a square metre basis) at a discounted price, broadly equivalent to build costs."

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24.2.2. But we are concerned about the reference to low-standard housing on page 66 “To ensure developers are not rewarded for low-standard homes under the Levy, local authorities could have an option to revert back to cash contributions if no provider was willing to buy the homes due to their poor quality.” Surely poor quality homes should not be allowed in any circumstance and the Government must enforce legislation to ensure that they are not built. New home owners should not be forced to put up with poor quality homes at any price.

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

[Yes / No / Not Sure]

Why?

24.3. Yes

24.3.1. The risk of a ‘market fall’ should be borne by the developers and should not affect the number of affordable homes provided

24.3.2. We are concerned if a large portion of any levy is linked to affordable homes as the levy should also provide the infrastructure needed for the development (schools, roads, green spaces etc.) as it is very unlikely that government funding will be available for local infrastructure.

(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]

Why?

24.4. Yes

24.4.1. Surely poor quality homes should not be allowed in any circumstance and the Government must enforce legislation to ensure that they are not built. Any residents of new homes should not be forced to put up with poor quality homes at any price.

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

[Yes / No / Not Sure]

Why?

25.1. Yes

25.1.1. The white paper states that “we could also increase local authority flexibility, allowing them to spend receipts on their policy priorities, once core infrastructure obligations have been met. In addition to the provision of local infrastructure,

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including parks, open spaces, street trees and delivery or enhancement of community facilities, this could include improving services or reducing council tax.” Our experience is that unless the levy is vastly increased, little more than core infrastructure obligations are ever met!

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

[Yes / No / Not Sure]

Why?

25.2. Not Sure

25.2.1. The proposal suggests that “it may be necessary to consider ring-fencing a certain amount of Levy funding for affordable housing to ensure that affordable housing continues to be delivered on-site at current levels (or higher).” Whilst we strongly support the need for truly affordable housing and social housing, the current government schemes do little to support homeownership but much to allow builders to sell lower quality homes to vulnerable first time buyers. Infrastructure delivery for the entire community to support the integration of new residents into existing communities and to mitigate the impact of extra residents on existing infrastructure is also important.

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?

[Yes / No / Not Sure]

Why?

26.1. Yes

26.1.1. The proposals restrict the right of local authorities and communities to influence bad development proposals which are driven by developers. Reducing the scope of local plans would undermine policies which protect groups with protected characteristics, and other lower income groups, and those without savings, or in debt.

26.1.2. Implicit throughout this document is the redefinition of “affordable housing” as lower cost market provision, rather than understanding the assessed need for social rent housing for those with lower, insecure and variable incomes, and especially those with low savings or who are in debt.

26.1.3. The outcome if these proposals were to be adopted would be weaker public policy controls over the vested interests of the private developers and less provision of really affordable housing.

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26.1.4. This would adversely affect people with protected characteristics as defined in section 149 of the Equality Act 2010: ethnic minority groups, especially black and Asian people and people of mixed heritage, and single parent households.