



About Us

BuildEast is an informal alliance of the 15 largest **developing housing associations** based across the East of England. We provide homes that are fit for the future in the East. Together we meet the needs and ambitions of the people and communities in our region. Together we combine our individual strengths to make a bigger difference.

Collectively BuildEast plans to build at least 22,000 homes over the next 5 years, directly employs more than 4,500 people, manages in excess of 150,000 properties and houses over 300,000 people.

BuildEast work together to:

- Make the case for investment in housing
- Consider the impact of government policy on housing associations
- Share information/experience to help improve the efficiency of BuildEast members
- Form a lobbying body on issues we want to try and influence
- Raise the profile of housing associations through insightful research
- Network and try to influence key decision makers

Members

Catalyst Housing Association

Catalyst Housing is a housing association operating in London and the south- east of England. It currently manages 32,000 rented and leaseholder homes including a wide range of affordable housing. They are also a member of the G15 group of London housing associations.

bpha Ltd

Bpha is a housing association located in the Oxford and Cambridge arc. They currently manage 19,000 homes and have 400 employees.

Broadland Housing Association

Broadland have been providing quality affordable homes across Norfolk and North Suffolk since 1963. They provide 5,000 quality homes.

Cross Keys Homes

Cross Key Homes is the largest housing association in Peterborough. They manage over 11,500 properties which include social housing, shared ownership, private rent and leasehold.

CHP

CHP is a locally and governed managed housing association based in Chelmsford, Essex. Established back in 2002. They currently manage 10,000 homes and provide services for over 20,000 customers.

Estuary Housing Association

Estuary is a Essex based Housing Association. They work within every district in Essex, the three outer East London Boroughs and in the Suffolk Coastal District. The organisation manages just over 4,600 properties in total and have just over 300 employees.

Flagship Group

Flagship provide 28,000 homes for affordable and market rent, and for shared ownership and sale across the East of England. They have a turnover of £160m, employ over 1,033 people and are proud to have an A1 Moody's rating.

Grand Union

Grand Union Housing Group was formed in 2008 they currently own and manage over 10,000 homes across Bedfordshire, Northamptonshire and the surrounding counties.

Greenfields

Greenfields Community Housing is a community-centered housing association based in East Anglia. They own nearly 9,000 homes in Essex and South Suffolk.

Havebury Housing Partnership

Havebury, a specialist in affordable housing in Suffolk, offers social housing in the Bury St Edmunds and Haverhill areas. They manage over 6,400 houses and flats in towns and villages around Bury St Edmunds and Haverhill.

Hightown Housing Association

Hightown operates in Hertfordshire, Bedfordshire, Buckinghamshire and Berkshire. They currently manages almost 6,600 homes and employs over 1,000 staff. With an annual turnover of £84 million, the organisation is committed to developing 1,000 new affordable homes over the next two years.

Settle

Settle is a not-for-profit housing association which provides homes across eight local authority areas in Hertfordshire and Bedfordshire. It currently manages over 9,000 homes.

Swan

Swan Housing association first formed in 1994 and it aims to provide high-quality and affordable homes to rent and buy in the Essex and East London Area. They locally manager over 11,000 homes and have a secure development pipeline of 8,000 homes and an ambitious corporate strategy which aims to deliver an additional 10,000 homes by 2027.

Watford Community Housing Trust

Watford Community Housing Trust is a housing association providing around 5,000 affordable homes and additional services to over 20 local communities throughout Watford and parts of Three Rivers.

Consultation Responses

Question 1.

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

- Complicated
- Slow
- Bureaucratic

Question 2a

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

Yes No

Question 2(b).

If no, why not?

- Don't know how to
- It takes too long
- It's too complicated
- I don't care
- Other – please specify

Question 3.

Our proposals will make it much easier to access plans and contribute your views to planning decisions.

How would you like to find out about plans and planning proposals in the future?

Social media

- Online news
- Newspaper
- By post
- Other – please specify

Email alert/online

Question 4

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

- Building homes for young people
- Building homes for the homeless
- Protection of green spaces
- The environment, biodiversity and action on climate change
- Increasing the affordability of housing
- The design of new homes and places
- Supporting the high street
- Supporting the local economy
- More or better local infrastructure
- Protection of existing heritage buildings or areas
- Other – please specify

Question 5.

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

- Yes
- No
- Not sure.

Please provide supporting statement.

As a housing association working across the Eastern Region, we need to be aware of different policies that apply to specific localities. Simplification and streamlining would be welcome. We have members working in collaboration with tier 2 and unitary authorities, some of whom do not have a current or approved Local Plan and therefore determining the potential success of planning applications in some areas can be unpredictable and waste resources/lead to delay.

We welcome the zoning of land in offering clarity, and the automatic outline approval for growth sites. We agree this should help speed up delivery on these sites and will assist us greatly in clearly understanding the needs of each LA area and in producing new affordable housing schemes that meet with requirements.

Question 6.

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

Yes

No

Not sure.

Please provide supporting statement.

We welcome national development management standards as a way of achieving consistency and adding certainty to the process. A national standard approach for application processing, management and decision is long overdue. However, we are mindful that there are specific circumstances that exist in certain LA areas, such as those with large scale regeneration needs and these may need a tailored approach.

Questions 7(a).

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

Yes

No

Not sure.

Please provide supporting statement.

The current system is largely impenetrable to those without a detailed technical knowledge of planning law and policy and has led to much expense and delay. We welcome initiatives that speed up the process and the enhanced emphasis on assessing the economic, social and environmental impact of specific area-based proposals. We would welcome clarity on how the current viability assessment of Local Plan proposals would be tackled in the new ‘sustainable development’ test.

Whilst we have seen that the plan-wide viability assessments are detailed, costly and time consuming, they have informed CIL levels and affordable housing policies. How will this aspect be tackled under the new proposal?

Question 7(b).

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

As a principle, Build East are advocates of collaboration and partnership working. So much of what we achieve is founded in wider working relationships with local authority partners, developers and other third parties. The collaboration of partners across administrative boundaries is helpful and necessary to enable strategic planning for growth and infrastructure over wider areas. Since the abolition of structure plans and regional spatial strategies the hierarchy of plan-making over a wider geography has been somewhat lost.

If the Duty to Co-operate is also abolished, then we fear that the legal imperative for local authorities to collaborate on housing market areas is lost / weakened. The Duty to Cooperate has proved its worth in forcing certain LAs to work in a collaborative/co-operative manner with their neighbours on strategic schemes that would otherwise have been 'stalled' and require direct Governmental level intervention to progress. Each Local Plan should 'have relevance' to neighbouring Local Plans and indicate possible conflicts.

We have seen examples where the Duty to Co-operate has helped to facilitate housing growth in the Eastern Region. For example between Harlow, Epping Forest, East Hertfordshire districts on the Gilston Park garden town settlement and other growth areas around the former new town, which also forced the two first tier authorities to work in a more collaborative way on the settlement. In Cambridge where co-operation led to the sharing of housing requirements, joint strategic planning and a shared team. Another example is the shared local plan between Norwich/Broadland and South Norfolk.

We would not want to see a system whereby less emphasis is placed on partnership/collaboration/co-operation as this would be a backwards step and likely to hinder the planning and delivery of growth and infrastructure over wider areas. In our opinion the Duty to Cooperate has helped facilitate housing growth and we would not want to see it abolished.

Questions 8(a).

Do you agree that a standard method for establishing housing requirements (that considers constraints) should be introduced?

Yes

No

Not sure.

Please provide supporting statement.

We agree. This should speed up the process by reducing/eliminating the need for detailed assessments that are then picked over at length during Examination and risk rail-roading the plan-making process. This will add transparency to the process.

We have seen an informal assessment that suggests greater housing growth in the Eastern Region as a result of this top down approach. Given the scale of housing need in the region we support greater housing allocations in the East.

Question 8(b).

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

Yes

No

Not sure.

Please provide supporting statement.

As a principle we all agree that affordability is an issue across the region and this manifests itself in various ways. Young people unable to leave home, people living in overcrowded or unsatisfactory conditions, unaffordable short-term solutions and homelessness. These are all issues we are committed to tackling.

We agree that housing growth should be targeted in areas where affordability is particularly problematic. We are aware that areas with high values suffer from unaffordability. Equally, areas with below average values can also suffer from unaffordability, because incomes are almost universally lower in these areas. Housing need can be hidden.

Current urban boundaries should not be a constraint on quantity. The overwhelming demand to greatly increase the supply of all forms of homes, including affordable homes should inform the quantum of development, rather than the extent of existing urban areas.

Question 9(a).

Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?

Yes

No

Not sure.

Please provide supporting statement.

We agree that this will speed up the process. Automatic permission should not come at the expense of or a reduction in the amount of truly affordable homes. Outline consents can often form the initial basis of a detailed consent and factors such as design, parking, access, highways and infrastructure need to be considered early on. We are keen to stress that local input into decision making should not be overshadowed and the process of designating sites for growth

needs to be done in consultation. We are interested in how this will be achieved for sites on boundaries and requiring infrastructure across a wider area if the Duty to Co-operate is removed.

Question 9(b).

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

Yes

No

Not sure.

Please provide supporting statement.

The proposal for renewal areas is welcomed, but we are less certain about the proposals for protected areas and cannot reach an informed view until significantly more detail on the criteria and process of designation is available.

Question 9(c).

Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

Yes

No

Not sure.

Please provide supporting statement.

Our members either supported this or were unsure as a result of the lack of clarity in the Whet Paper about what this would mean / involve.

We can see that potentially; this could be a solution for cross boundary schemes/regional planning. Historically, the largest creation of new settlements in response to an urgent national demand for more homes has only been achieved through consideration (and by being driven) at a national level. If these were left to local decision-making powers, very few of the post war new towns would have come into existence.

As a principle, if it speeds up and facilitates delivery then we would support it.

Question 10. Do you agree with our proposals to make decision-making faster and more certain?

Yes

No

Not sure.

Please provide supporting statement.

Yes, we support initiatives that speed up the planning system and the delivery of affordable homes in particular. A system that results in more certainty will enable us to become more efficient and focus our limited resources better. As a principle throughout the aspects of this consultation we would like to make clear that local authorities may need MHCLG support with additional resources and expertise to deliver the fundamental changes proposed in the paper.

Question 11.

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

Yes

No

Not sure.

Please provide supporting statement.

We support this and like the idea of it being less wordy and more visual. As we have seen with the emergence of video calling and on-line remote working during the Covid-19 pandemic, web-based systems will become even more inherent to our daily working lives. A web-based local plan system would be hugely beneficial, if it is easy to read and understand and is captured in a single 'hub'. A portal offering numerous options and confusing information should be avoided. Uniformity across local authorities would be helpful for organisations who works across many areas. We would like to see proposals for how the digitally excluded will be able to access and engage with proposals.

Question 12.

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

Yes

No

Not sure.

Please provide supporting statement.

Whilst 30 months still seems like a long time to develop a Local Plan it is a vast improvement on current delivery which can be 5-7 years. We see that there may be a need for support to planning departments to enable them to deliver.

One of our members expressed concern that 'the required enabling legislation will need to be in force, with any necessary accompanying regulations and guidance, by autumn 2021. Given the significant pushback from Conservative MPs in the Shires over recent days about the problems that proposed algorithm that will be used to show where new high-density housing will be needed and the likely distractions of Covid-19 and Brexit in Q1 of 2021 this timescale is ambitious. All of this is more likely to take longer than this life of this Parliament to deliver'.

Question 13(a).

Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

Yes

No

Not sure.

Please provide supporting statement.

We support the principle of neighbourhood planning and devolving decision making to the lowest level where communities have an appetite and resources to undertake this role. This ensures that the third tier – town and parish councils – are actively involved in planning for future housing. We would encourage Government to reflect on the areas where neighbourhood plans have come forward and whether there is a correlation with affluence/deprivation. Are we leaving places behind?

Neighbourhood plans suit villages, but we have seen evidence of Nimbyism and they should not be used as a tool to limit or block development in an area in favour of development in an area that is more challenging for Registered Providers to deliver in. Neighbourhood Plans should be retained; however, they do need to be structured in the same way as new Local Plans and driven by objective members to minimise NIMBYism and personal bias.

Question 13(b).

How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

Our experience is that community consultation is best achieved in person, where stakeholders can review proposals and make comments, ask questions and share the views openly or discreetly. These forums allow for a two-way exchange where often, but not always, views and concerns may be altered. Web-based solutions offer advantages to stakeholders who are unable to attend, but also offer the opportunity for a very one sided, often negative stance to be taken. Any digital tool would ideally need to offer a chat room style function, enabling two-way communication, highlighted issues and responses and allowing for controlled Q&A.

Question 14.

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

Yes

No

Not sure.

Please provide supporting statement.

Developer absorption rates dictate the build out rates and this limits housing output and controls the release of new homes to the market. Currently, developer build out rates are dictated by a pricing protection approach. In the same way that approvals have a time limit for commencement, they should include an agreed time limit for completion. This is especially important if the infrastructure levy proposed is introduced with payments at completion, as the flow of income into LA's for the cost of major infrastructure would be severely affected by a slowing of schemes. On larger schemes, time restrictions should be in place in building out their units, limiting the time for developers.

Specifically, regarding affordable homes, these can be delayed due to developers responding to market fluctuations and sales rates. More emphasis should be placed on starting on site within a period from planning consent, and more emphasis should be placed on the delivery of any affordable homes. Where these are within a multi-tenure block, we understand that there is an inherent link to market sale delivery. However, where affordable dwellings form standalone blocks or dwellings in a scheme, these could be fast tracked, and developers incentivised to do so.

Question 15.

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

- Not sure or indifferent
- Beautiful and/or well-designed
- Ugly and/ or poorly designed
- There hasn't been any
- Other – please specify]

There are examples of extremely well planned, well designed and high quality schemes that respond to the local area in a positive way and equally, there are examples of schemes that seem to favour density over place-making and wider factors such as parking and infrastructure. We see a relatively large number of schemes that have secured planning without the need to deliver affordable homes, supported by viability assessments to highlight the construction costs and therefore lack of viability for affordable homes. However, these schemes are usually the ones that have maximised site capacity in terms of building height, inclusion of basement parking and complexity etc. and are therefore inherently expensive to build regardless of the tenure. A number often revolve around the marketplace with neither developer nor RP sector being able to make them work. Hopefully the new proposals will help to mitigate some of these types of schemes and provide greater support for the inclusion of affordable homes.

Question 16.

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

- Less reliance on cars
- More green and open spaces
- Energy efficiency of new buildings
- More trees
- Other – please specify]

All are important but the drive for net zero means that energy performance of homes is the top priority for our members.

Car parking was also noted as a challenge to the wider planning approach to new developments as it requires a cultural change as well as a physical change.

Question 17.

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

- Yes
- No
- Not sure.

Please provide supporting statement.

We support initiatives that improve the design and quality of homes. We would encourage these to consider functionality, environmental impact, design, connectivity and so on.

It should also assist with reducing the overall level of dialogue with the planning authority and community stakeholders when schemes are proven to respond to adopted design guides.

Question 18.

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

- Yes
- No
- Not sure.

Please provide supporting statement.

Most LAs already have an officer at a senior level with this responsibility. It is more important how the role is formed in statute: i.e. making it a statutory role like that of the Monitoring Officer with the ability to override Members where statute enables.

We support the idea as a way of increasing the priority and status at the local level that 'design' rightly deserves. This is especially important given that the built environment is a long-term resource. We believe that a link into construction and a high-level understanding of buildability is needed. We have seen a number of design led projects that look wonderful on paper, however they are relatively expensive and complicated to build. Design should be important, but not at the cost of function and value. As a principle we would want assurance that this would not create a 'bottleneck' in the organisation. Authorities are understaffed, overstretched and in our area, it is difficult to recruit officers with the right skills.

Question 19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

Yes
No
Not sure.

Please provide supporting statement.

It is unclear how this would work in practice. Our members have examples of several 'off the shelf' opportunities that are available for affordable homes, but which we are unable to work financially due to the scheme design and special standards. This might help to address the issue, but good design should be a level playing field. We would want assurance that this brings actual benefits to our tenants.

Question 20.

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

Yes
No
Not sure.

Please provide supporting statement.

The term 'beauty' is subjective. We would need to understand what this means in practice. We agree that fast-track is warranted for well designed, functional and good value homes where people will want to live and support their community.

Question 21.

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

More affordable housing
More or better infrastructure (such as transport, schools, health provision)
Design of new buildings

- | | |
|------------------------------------|--------------------------|
| More shops and/or employment space | <input type="checkbox"/> |
| Green space | <input type="checkbox"/> |
| Don't know | <input type="checkbox"/> |
| Other – please specify] | <input type="checkbox"/> |

There is a high need for affordable housing in the East of England where we operate. In 2018/19 house prices were on average, **11 times incomes** across the region. An 80% mortgage requires an income of £76k and yet the average income is just £30k (NHF Home Truths).

National organisations such as the CIH, Shelter, JRF, NHF, Crisis and so on have said that **90,000 new social rented** homes are required in this country per year.

We have seen the **rise in homelessness** and the numbers of rough sleepers brought in from the streets during the pandemic. We know that many households will be at risk of homeless once the eviction ban lifts. It is well documented how many households are living in poverty. In March 2020 we had **93,000 families living in temporary accommodation**, a 14 year high.

50% of all new affordable homes are delivered via s106. It is critical that this delivery is increased and not put at risk. The introduction of the new Levy needs further clarity on how it will work and how if possible, affordable homes levels can be increased not reduced.

We are extremely concerned that the development of 25% First Homes will reduce the amount of social and affordable rented homes that are available to folk on the very lowest incomes – those who experience the worst effects of market failure.

We understand the Housing, Communities and Local Government Committee has a remit to ‘*examine the expenditure, administration, and policy of the Ministry of Housing, Communities and Local Government*’. They were recently asked to consider affordable housing and made numerous recommendations, some of which are paraphrased below. We would like to raise a concern that at the current time, as drafted, the White Paper does not address the issues raised by this parliament committee:

- *It is crucial that the Government links local incomes to a definition of affordability, rather than using “affordable” as a synonym for below market rent or market value.*
- *There is compelling evidence that England needs at least 90,000 net additional social rent homes a year. ...England has only ever surpassed 300,000 in a year when social housing has made a significant contribution.*
- *It is disappointing that the Government does not have a published plan on social housing, nor has its own assessment of social housing need. We regard an estimate of need to be essential to calculating how much investment the Government may need to make to meet social housing need and deliver such a “step change”.*

- *A social housebuilding programme should be top of the Government's agenda to rebuild the country from the impact of COVID-19.*
- *The Government should count investment in social housing as infrastructure spending, rather than day-to-day spending. Evidence shows that spending on a long-term social housebuilding programme pays back to the Exchequer over time.*

<https://publications.parliament.uk/pa/cm5801/cmselect/cmcomloc/173/173.pdf>

Question 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.

Some of our members have replied 'not sure' and some have said 'no'.

Those who have replied 'no' are not convinced that the system is broken enough to warrant whole scale replacement.

All our members are concerned that First Homes will reduce the number of social and affordable homes available for people in highest housing need. We would like a guarantee that a new infrastructure levy system would increase and not simply match current numbers of affordable homes provided through the s106 route. We would not support a position whereby the future levy results in less on-site contribution than the system it replaces.

We do not believe that the paper includes enough detail about how the levy will operate. It seems to be that the new charge will be based on the final value of development, with a minimum threshold below which nothing would need to be paid; and be levied at the point of homes being occupied (although the exact calculation is unclear). We encourage Government to consult with affordable housing providers on how the levy contribution for affordable housing will be calculated. How is the price of affordable housing going to be established?

If the levy is not ringfenced for affordable housing, there is a risk to delivery. Local Authorities must decide where to spend the levy and it enables developers to negotiate out more.

Question 22(b).

Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

- Nationally at a single rate
- Nationally at an area-specific rate
- Locally

To reflect housing markets at the local level.

Question 22(c).

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

- Same amount overall
- More value
- Less value
- Not sure.

Please provide supporting statement.

If the threshold is raised, then the new thresholds need to encompass provision that those smaller sites no longer contribute towards – or we'll end up with less overall. The need for affordable housing is so high that all policy levers need to be used to maximum effect to meet need.

Question 22(d).

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

- Yes
- No
- Not sure.

Please provide supporting statement.

Yes, provided

Front funding for infrastructure will support delivery. If the levy is not calculated and collected until occupation, then local authorities need a way to front fund infrastructure to enable development to proceed. Loans against future levy income seems like a sensible suggestion in these circumstances. LA's will need certainty over when funds will be paid to them otherwise, they may be reluctant to borrow on a potentially open ended, at risk basis.

Question 23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

- Yes

No
Not sure.

Please provide supporting statement.

Permitted development – especially where buildings are converted to residential – add to the housing stock. Any increase in dwelling numbers adds strain to local infrastructure and it is therefore right that permitted development contributes through levy.

Permitted development should not be treated outside of the mainstream planning process in terms of its requirement to contribute. However, PD development to date has not proved to produce homes that are of a suitable standard (in terms of size, location and social sustainability) and these matters must be addressed through any reform of the planning system. This paper should tackle the well documented sub-standard accommodation that has been created out of former commercial premises under PDR. PDR legislation needs to be amended to ensure that the dwellings created are fit for habitation.

Question 24(a).

Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

Yes
No
Not sure.

Please provide supporting statement.

We were unsure how to answer this question because we strongly believe that the aim should be to secure **substantially more** affordable housing through reform than is currently provided. We also want to ensure that it is reflective of locally identified demands in term of property types, sizes and tenures.

In areas with CIL, the s106 becomes the only negotiable elements and affordable housing has, in some cases, been reduced to achieve a viable position. The new levy needs to protect and enhance the delivery of affordable housing for the reasons given in Q21.

Question 24(b).

Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a ‘right to purchase’ at discounted rates for local authorities?

Yes
No
Not sure.

Please provide supporting statement.

Affordable housing needs to be removed from 'add on' levies and placed at the mainstream of the planning process. Its provision at increased levels should form the foundation of planning reforms. On-site provision has always been the most cost-effective means of delivery, so there must be an incentive to do this – but the homes have to meet size and quality standards.

Affordable housing needs to be a non-negotiable element of delivery. The monetary equivalent of these homes needs to be captured so that the remaining levy payments can be quantified. The difference between market value and the price paid would be the contribution amount. For this to work, there would need to be a national database or matrix of housing costs and values by tenure and regional areas, potentially with localised hotspots of high and low values outside of the norm. This would dictate the actual cost of housing to be paid in-kind, with any remaining costs charged via the Levy. We suggest that Homes England's database and intelligence on cost/values/grant etc can be used as a source to develop a tool for this.

We seek clarity on how this will work.

Question 24(c).

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

Yes

No

Not sure.

Please provide supporting statement.

Not enough detail to form a view.

Question 24(d).

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

Yes

No

Not sure.

Please provide supporting statement.

Greater collaboration with Registered Providers will be required to ensure that in-kind funding is converting into tangible affordable housing delivery. This may be via Local Authority subsidy of RP led developments or to assist with purchasing standing stock from the private sale market / bulk purchases from developers. Essentially there would need to be a more strategic plan on how those funds are allocated and spent.

There have been many national stories of sub-standard housing quality, poorly built homes, poor design etc and it is important that the national planning system addresses these problems. Minimum size and quality standards, private amenity space, and capping of management company charges are required. We note the proposals for the new homes ombudsman to provide for redress, but we believe that quality and design needs to be positively addressed in the planning stages. This is important for all tenures. It is an important consideration for affordable homes given that housing associations have the ongoing maintenance costs of homes in the long term.

Question 25.

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

Yes

No

Not sure.

Please provide supporting statement.

The infrastructure Levy should be spent on local needs reflecting the impacts of the development and wider area.

Question 25(a). If yes, should an affordable housing 'ring-fence' be developed?

Yes

No

Not sure.

Please provide supporting statement.

Ring fenced as a minimum requirement but with the ability to be enhanced where possible. Affordable housing provision at increased levels should be at the core of national planning policies and as such must be protected, be that by ring fencing or centring it at the core of the planning determination process.

Question 26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

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