

Guildhall Gainsborough  
Lincolnshire DN21 2NA  
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## AGENDA

This meeting will be streamed live via the address below and the video archive published on our website

**Prosperous Communities Committee**  
Tuesday, 20th October, 2020 at 6.30 pm  
<https://west-lindsey.public-i.tv/core/portal/home>

**Members:**

- Councillor Owen Bierley (Chairman)
- Councillor Paul Howitt-Cowan (Vice-Chairman)
- Councillor John McNeill (Vice-Chairman)
  
- Councillor Stephen Bunney
- Councillor Mrs Tracey Coulson
- Councillor Christopher Darcel
- Councillor Michael Devine
- Councillor Mrs Jessie Milne
- Councillor Mrs Judy Rainsforth
- Councillor Tom Regis
- Councillor Jim Snee
- Councillor Mrs Mandy Snee
- Councillor Mrs Anne Welburn
- Councillor Trevor Young

1. **Register of Attendance**
  
2. **Public Participation**  
Up to 15 minutes are allowed for public participation.  
Participants are restricted to 3 minutes each.

**3. Minutes of Previous Meeting**

- i) Minutes of the Prosperous Communities Committee - 14 July 2020

To confirm and sign as a correct record the Minutes of the Prosperous Communities Committee held on 14 July 2020. (PAGES 3 - 9)

- ii) Minutes of the Concurrent Meeting held on 16 July 2020

To confirm and sign as a correct record the Minutes of the Concurrent Meeting of the Prosperous Communities and Corporate Policy and Resources Committees held on 16 July 2020. (PAGES 10 - 12)

**4. Matters Arising Schedule**

(PAGES 13 - 15)

Setting out current position of previously agreed actions as at 12 October 2020.

**5. Members' Declarations of Interest**

Members may make any declarations at this point but may also make them at any time during the course of the meeting.

**6. Public Reports**

- i) Consultation Response to Planning for the Future White Paper (PAGES 16 - 42)

- ii) Workplan (PAGES 43 - 45)

Ian Knowles  
Head of Paid Service  
The Guildhall  
Gainsborough

Monday, 12 October 2020

Prosperous Communities Committee- 14 July 2020  
Subject to Call-in. Call-in will expire at 5pm on Tuesday 28 July

## WEST LINDSEY DISTRICT COUNCIL

MINUTES of the Meeting of the Prosperous Communities Committee held in the  
<https://west-lindsey.public-i.tv/core/portal/home> on 14 July 2020 commencing at 6.30 pm.

**Present:** Councillor Owen Bierley (Chairman)  
Councillor Paul Howitt-Cowan (Vice-Chairman) and  
Councillor John McNeill (Vice-Chairman)

Councillor Stephen Bunney  
Councillor Mrs Tracey Coulson  
Councillor Christopher Darcel  
Councillor Michael Devine  
Councillor Mrs Jessie Milne  
Councillor Mrs Judy Rainsforth  
Councillor Tom Regis  
Councillor Jim Snee  
Councillor Mrs Mandy Snee  
Councillor Mrs Anne Welburn  
Councillor Trevor Young

**In Attendance:**  
Ian Knowles Chief Executive  
Alan Robinson Director of Corporate Services and Monitoring Officer  
Andy Gray Housing and Enforcement Manager  
Diane Krochmal Housing Strategy & Supply Manager  
Grant White Enterprising Communities Manager  
Anna Grieve Contracts Manager  
Emily Holmes Selective Licensing Officer  
Katie Storr Senior Democratic & Civic Officer  
James Welbourn Democratic and Civic Officer

**Membership:** No Substitutes

**Apologies:** No Apologies

### 10 CHAIRMAN'S WELCOME

The Chairman welcomed all present to the second virtual meeting of the Prosperous Communities Committee and in doing so made reference to the recent recalculation of political balance and committee allocations. This had resulted in Councillor Waller no longer serving on the Committee and the Chairman therefore took the opportunity to thank him for the work he had undertaken and his contribution to the Committee.

## 11 PUBLIC PARTICIPATION

There was no public participation.

## 12 MINUTES OF PREVIOUS MEETING

(a) Meeting of the Prosperous Communities Committee – 2 June 2020.

**RESOLVED** that the Minutes of the Meeting of the Prosperous Communities Committee held on 2 June 2020 be confirmed and signed as a correct record.

## 13 MATTERS ARISING SCHEDULE

Members gave consideration to the Matters Arising Schedule which set out the current position of all previously agreed actions as at 6 July 2020.

In light of the concerns raised at the previous Committee meeting regarding the Leisure Centre, and in particular its cleanliness, the Chief Executive offered a brief update of the activity which had been taking place in preparation for the Centre's opening, following recent Government Announcements. The Contracts Manager, who had been working closely with the Leisure provider, and who was overseeing this work, was also in attendance and provided Committee with a more detailed update.

The Centre at Gainsborough would re-open on 25 July. Only dry side activities would be available and there would be a reduced programme. There would be no racket sports, no active seniors sessions and the gym facility had been spread over several locations to ensure guidelines could be met. All centre users would need to book and no walk-in users would be permitted, this arrangement would help facilitate track and trace requirements. The Centre would be open 8-4 weekends and 7-9 during the week, the same hours would apply to the new centre at Market Rasen which would also open its doors on 25 July for the first time.

The Centre at Gainsborough would be undergoing a deep-clean, by an external company, before the re-opening and staff had been attending the centre on a voluntary basis to assist with this work. Additional sanitizer stations had been installed and following the deep clean, all the necessary social distancing signage would be erected. The Contracts Manager would be having a walk around with the Centre Manager following the deep clean and it had been agreed in advance, any job not considered to standard would be repeated as part of the negotiated price. There was also an opportunity for Gainsborough Members and Members of this Committee to visit the centre next Friday, before the centre re-opened to ensure they were satisfied with the work that had been undertaken.

During the Centre's closure the heating to the pool had been turned off and chemical levels had been increased. Daily backwashing had been undertaken and was likely responsible for the visible grit Members had previously referred to. It was envisaged the process of increasing the temperature, re-aligning the chemicals and safety testing sign offs would be completed within 3-4 weeks, after which time some form of wet-side activity would be returned.

In response to Members' questions it was confirmed that SLM were aware of guidance relating to air conditioning and the air conditioning would therefore be off. The Leisure provider would be paying for the deep clean. However the Council were currently looking at how they could support the provider through the recovery when the centres would be operating at reduced capacity. This support was currently under negotiation.

Members thanked Officers for the update and the offer to visit the Centre in Gainsborough, on Friday 23 July before its re-opening was re-iterated.

**RESOLVED** that progress on the Matters Arising Schedule, as set out in the report be received and noted.

#### **14 MEMBERS' DECLARATIONS OF INTEREST**

Councillor Tracey Coulson declared a personal interest in agenda items 6 (a), and (b), (Progress of Health Related Work), and (Housing Enforcement Policy Review) as her business was a housing provider for the over 55's. Neither she nor her company however, would be directly or indirectly affected by the proposals within the reports.

#### **15 PROGRESS OF HEALTH RELATED WORK**

Members gave consideration to a report which provided the first annual update on progress of health related work within the authority, following it having been resolved at the Committee in January 2019 that Members would receive such an annual update report. The contents of the report were summarised to Members.

Debate ensued and whilst Members considered a lot of work had been undertaken and the Health and Well-being Partnership undoubtedly had the capability to deliver and make a difference, some considered there was still a lot of work to be undertaken in promoting the services available, and ensuring residents knew how to access them.

Councillor Young made reference to a number of questions he had submitted in advance of the meeting, all of which directly related to Appendix 1 of the report this being the 2018 - 2019 Annual Report of the Well-Being Lincs Partnership. He outlined a few of these to Committee and considered access to this type of information would really assist elected members in undertaking their roles and assisting residents.

Officers thanked Councillor Young for his questions, and advised the Committee that responses were being sought from the Partnership. Both the questions posed and responses received would be circulated to all Members of the Committee. Furthermore, the Service Manager of the Partnership had indicated he would be more than willing to address the Committee at a future meeting, to update them further on the work of the Partnership over the 2019/2020 year and to-date. Officers concurred with the comments around promotion and awareness raising and outlined some of the activities that were planned and of leaflets in production by the Communities Team.

Members also felt it was important, that in order to be able to better determine the true

impact of the work more information around the actual outcomes and detailed data would be helpful in the future.

In response, Officers advised that work was on-going to develop appropriate Corporate Plan measures. It was hoped measures developed would be able to demonstrate both the direct and in-direct benefits this work was having across the District. A report against corporate plan performance measures was due to be presented to Members later in the year and would include such information around the Health agenda.

The Chairman confirmed future attendance by the Service Manager of the Partnership would be welcomed and Officers undertook to arrange this for a future meeting.

**RESOLVED** that

- (a) the ongoing work relating to health and well-being and the forward plan be approved;
- (b) a further update report be submitted to the Prosperous Communities Committee in one year's time.

## **16 HOUSING ENFORCEMENT POLICY REVIEW**

The Council was required to have in place a Housing Enforcement Policy and from time to time, as legislation was introduced or amended the policy would require revision.

Members gave consideration to a report which set out a revised version of the policy and which outlined the main changes made, as detailed in Section 3 of the report. These were summarised to Members with rationale and explanation offered for each.

It was noted that the Council's ability to enact parts of the policy were restricted currently due to the Covid-19 pandemic. Specific guidance had been issued to landlords and tenants in relation to disrepair and this was being applied at the current time. The main restriction related to the internal inspections of properties, which carried a significantly higher risk to staff than in any normal circumstance. Other methods for assessing matters under the policy were being developed to enable the service to continue to be delivered. The focus currently remained on high risk issues that could cause a threat to life.

Debate ensued and Members firstly congratulated Officers for the work they undertook in relation to Housing Enforcement. Members considered the service performed well and was often ahead of the game in the approaches and measures it used.

In response to requests for data demonstrating activity across both Gainsborough and the District, Officers advised, whilst the majority of activity was focussed within Gainsborough, as this was where issues were readily identified and reported, the approach taken was a District Wide approach. It was acknowledged that similar issues existed in rural communities and Officers offered reassurance that all cases, regardless of location, would be addressed in the same manner.

Whilst the location of reports was not something regularly reported to Members, Officers

advised they could provide information detailing the spread of cases.

Members again thanked the Team for the work undertaken and encouraged that this continue.

**RESOLVED** that:

- (a) the revised Housing Enforcement Policy be approved; and
- (b) delegated authority be granted to the Chief Executive, in consultation with the Chairman of the Prosperous Communities Committee, to make minor housekeeping amendments to the Policy in the future.

## **17 HOUSING ACT CIVIL PENALTIES POLICY REVIEW**

The Housing and Planning Act 2016 made provisions for Local Authorities to issue civil penalties for certain offences under the Housing Act 2004. The Council introduced its first policy to enable this in May 2018, with further revisions made in March 2019.

The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 came into effect on June 1<sup>st</sup> 2020. This regulation required all landlords to have a valid electrical safety certificate in much the same way as a gas safety certificate was required. Due to the introduction of an additional offence, the Policy required further updating to include this.

Members therefore gave consideration to a report which outlined these additional powers and gave an overview of other changes made and deemed necessary in order to further improve the policy and ensure it remained robust. These were detailed at Section 3 of the report.

The report also provided high-level information of the penalties issued to-date under the Policy and further offences were anticipated following the introduction of this new legal requirement.

Debate ensued and Officers were again congratulated for their work. It was acknowledged that the new regulations would be challenging particularly in older housing stock. Assurance was sought that any stock with which the Council had a direct association would be subject to the same checks including any Almshouses in the Council's ownership.

It was confirmed that the small stock hold within the South West Ward, would be tested although the Council was not responsible for arranging the check. All had scheduled inspections and Officers could provide the dates if needed. Certificates once issued were active for five years.

With regard to Almshouses, Officers requested that the Member provide specific details of the properties.

A point of information was offered from Vice-Chairman, Councillor Howitt Cowan, who served as a trustee for the Charles Cooper Almshouses. He advised that the Almshouses

within that particular Trust were most definitely not within the ownership of West Lindsey District Council.

Officers re-iterated the offer to further look into the matter if specific details could be provided.

On being put to the vote it was

**RESOLVED** that

- (a) the revised Civil Penalties Policy be approved; and
- (b) delegated authority be granted to the Chief Executive, in consultation with the Chairman of the Prosperous Communities Committee, to make minor housekeeping amendments to the Policy in the future.

## **18 WORKPLAN**

Members gave consideration to the Committee Workplan.

**RESOLVED** that the workplan as set out in the report be received and noted.

## **19 EXCLUSION OF PUBLIC AND PRESS**

**RESOLVED** that under Section 100 (A) (4) of the Local Government Act 1972, the public and press be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12 A of the Act.

## **20 SAFER STREETS FUND - DELIVERY**

Members gave consideration to a report which sought approval of the delivery of CCTV upgrades and expansion subject to Safer Streets Funding being secured.

Members noted that the funding came with stringent conditions meaning the area specified within the report was one of only two areas within the whole of Lincolnshire eligible to apply. Details of the bid submitted and the additional resources this would bring to the area were shared in detail with the Committee.

The bid outcome was awaited and was expected by the end of month, delivery of the proposed scheme was dependent on a successful bid, following which the timescales for implementation were tight, with all monies needing to be spent before March 20201.

Debate ensued and Members fully supported the investment and additional provision. It was acknowledged that there was a perception that CCTV did not work and was not always a deterrent. However, CCTV could and would never prevent every crime. Detection was only part of the process and police presence at incidents nationally was on a priority basis.

A record of incidents and data was retained; evidencing impact on criminal cases could be difficult due to the timeline within the criminal justice system. CCTV also afforded benefits in respect of wider enforcement issues.

Members felt it imperative that there was better reporting of outcomes directly resulting from CCTV intervention or information in order to improve public confidence. Officers undertook to publish some case studies in a future edition of the Members Bulletin.

Following further discussion around the specifics of the upgraded equipment and additional capability this would afford it was

**RESOLVED** that

- (a) the upgrade of public space CCTV be approved subject to the Safer Streets Fund bid being successful and subsequent grant agreement with the Office of Police & Crime Commissioner; and
- (b) it be **RECOMMENDED** to the Corporate Policy & Resources Committee that a capital budget for this project be created.

The meeting concluded at 8.10 pm.

Chairman

# Agenda Item 3b

Concurrent Meeting of the Prosperous Communities and Corporate Policy and Resources Committees- 16 July 2020

Subject to Call-in. Call-in will expire at 5pm on 5 August 2020

## WEST LINDSEY DISTRICT COUNCIL

MINUTES of the Meeting of the Concurrent Meeting of the Prosperous Communities and Corporate Policy and Resources Committees held in the via MS Teams on 16 July 2020 commencing at 6.30 pm.

**Present:**

Councillor Giles McNeill (Chairman)  
Councillor Owen Bierley (Vice-Chairman)

Councillor Matthew Boles  
Councillor Stephen Bunney  
Councillor David Cotton  
Councillor Mrs Tracey Coulson  
Councillor Christopher Darcel  
Councillor Michael Devine  
Councillor Ian Fleetwood  
Councillor Paul Howitt-Cowan  
Councillor John McNeill  
Councillor Mrs Jessie Milne  
Councillor Mrs Judy Rainsforth  
Councillor Jim Snee  
Councillor Mrs Mandy Snee  
Councillor Robert Waller (from item 2)  
Councillor Mrs Anne Welburn (from item 2)  
Councillor Trevor Young

**In Attendance:**

Ian Knowles Chief Executive  
Alan Robinson Director of Corporate Services and Monitoring Officer  
Diane Krochmal Housing Strategy & Supply Manager  
Ele Snow Democratic and Civic Officer  
James Welbourn Democratic and Civic Officer

**Apologies:** There were no formal apologies.

### 1 REGISTER OF ATTENDANCE

The Chairman welcomed everyone present to the meeting before moving to the register of attendance.

### 2 MEMBERS' DECLARATIONS OF INTERESTS

**Note:** Councillor Bob Waller and Anne Welburn joined the meeting at this point in proceedings.

Cllr David Cotton asked whether there would be a conflict of interest for any future planning applications for those Members who also sat on the Planning Committee. The Monitoring Officer confirmed that he did not envisage a conflict of interest arising due to this report.

Cllr Trevor Young informed the committee that he had worked with the company involved in the report during the course of his previous job – however this did not preclude him from speaking or voting on this item.

### **3 PROCEDURE**

The concurrent meeting procedure was noted.

### **4 EXCLUSION OF PUBLIC AND PRESS**

**RESOLVED** that under Section 100 (A)(4) of the Local Government Act 1972, the public and press be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A of the Act.

### **5 VIABLE HOUSING SOLUTION**

Members considered a report on a proposal with P3 as the preferred option to deliver a Viable Housing Solution in Gainsborough, with the associated proposed funding strategy.

The Housing Strategy and Supply Manager introduced the report and outlined the key points:

- There was a need for intervention alongside a thorough understanding of the housing need in Gainsborough;
- It was deemed necessary to intervene and disrupt the housing market. The proposed scheme would enable to access the support required to enhance education, training and life skills;
- The scheme should lead to improved tenant behaviour due to the increase in neighbourhood management;
- The scheme helped to satisfy ambitions to improve the housing stock in Gainsborough and to achieve growth ambitions for the town.

Members commented on the paper and asked questions of officers. Further information was provided:

- The scheme enables people to realise their potential and contribute to the economy;
- Open, green spaces with a community feel were desirable; this was an ambition over the longer term with the potential to remove 1-2 properties to expand on the green spaces;
- There were very few providers of this calibre. The scheme itself had a lot of merit; however it would not be a solution to all of the problems in the South-West ward itself, as some of the area in question lends itself to large scale recovery;
- The provider had assured West Lindsey District Council that they will be licensing

Concurrent Meeting of the Prosperous Communities and Corporate Policy and Resources Committees- 16 July 2020

Subject to Call-in. Call-in will expire at 5pm on 5 August 2020

properties under the selective licensing scheme and this will be included in the Grant Funding Agreement;

- Properties will be transferred to the provider as they currently stand. Only 5 properties were currently let under the 'intensive support' concept. Part of the agreement with the proposed provider would be guidance on how the properties should be managed;
- There was evidence of need for this scheme in Gainsborough; however that was not to say that the scheme couldn't be rolled out to other parts of the District if the evidence presented itself;
- Lessons could be learned from the work done in Hemswell Cliff;
- The 'Communities at risk' policy would highlight issues if and when they increased;
- Support will be in place for tenants. As the provider tackled refurbishment projects, they can teach tenants skills, such as basic home maintenance;

As the recommendations required approval from both Prosperous Communities and Corporate Policy and Resources Committees, votes by way of an alphabetical roll call were taken separately, with Prosperous Communities being first, following the resolutions being moved and seconded by both Committees. The resolutions were taken en bloc (by each committee in turn):

Following an alphabetical roll call, with a total of 13 votes cast in favour and 0 against it was **RESOLVED** by Prosperous Communities Committee to:

- Agree that the proposal with the Charity 'P3' is the preferred option to deliver a Viable Housing Solution for Gainsborough to meet the objectives agreed by the Committee on 22/10/2019; therefore the report is recommended to Corporate Policy and Resources Committee.

Prior to the vote by Corporate Policy and Resources, the Chairman tabled a slight amendment to the final recommendation by adding the text "and the Leader of the Opposition" to the end of the last sentence. As this was only a small amendment to the recommendation, and did not change the nature of the recommendation, the committee were not required to vote on the amendment; the committee had no objections to the change. Therefore, the Corporate Policy and Resources Committee **RESOLVED** to, with 13 votes in favour and 0 against:

- Agree the proposed funding strategy (including the transfer of 12 council owned properties) and approve the financial and resource implications;
- Delegate the detail of the Grant Funding Agreement to the Chief Executive in consultation with the Chairmen of Prosperous Communities and Corporate Policy and Resources Committees, and the Leader of the Opposition.

The meeting concluded at 7.33 pm.

Chairman

## Prosperous Communities Matters Arising Schedule

### Purpose:

To consider progress on the matters arising from previous Prosperous Communities Committee meetings.

**Recommendation:** That members note progress on the matters arising and request corrective action if necessary.

### Matters arising Schedule

Meeting	Prosperous Communities Committee				
Status	Title	Action Required	Comments	Due Date	Allocated To
Black	<a href="#">information pack for parish councils re reporting issues</a>	Extract from mins of mtg 22/10/19 Officers undertook to prepare a guidance and information pack for Parish Councils covering some of the top issues affecting a number of parishes, explaining how to report certain issues and the options available to them. This was welcomed.	<a href="#">At previous Committee Meetings the Parish Charter document has now been approved and a new Parish Council Support webpage has been created as part of this. This page lists details of schemes open to parish/town councils and links to reporting things to the District Council. The page is now live at: <a href="http://www.west-lindsey.gov.uk/parishsupport">www.west-lindsey.gov.uk/parishsupport</a></a>	15/06/20	Grant White
Black	<a href="#">additional information following p and d discussion.</a>	information requested through the debate be provided to Members namely more detailed telephone stats , time taken to answer calls, types of calls , % of calls in time etc, more detail in mins of mtg dated 2 June 2020	<a href="#">information circulated</a>	16/07/20	Katie Storr
Black	<a href="#">Parish Charter needs amending before launch</a>	document be amended as per committee request see mins from 2 June prior to the Launch of the document	<a href="#">(blank)</a>	01/07/20	Grant White
Black	<a href="#">Progress health related report - further annual report</a>	extract from mins of meeting 14/07/2020 (b) a further update report be submitted to the Prosperous Communities Committee in one year's time.	<a href="#">please ensure this is added to reports management system at the earliest opportunity - item added for June / July 2021</a>	31/08/20	Diane Krochmal
Black	<a href="#">Housing Enforcement - Location of Cases</a>	extract from mins of mtg 14/07/2020 Whilst the location of reports was not something regularly reported to Members, Officers advised they could provide information detailing the spread of cases.	<a href="#">please provide data to Members of PC Cttee as indicated - information circulated 21 July</a>	15/08/20	Andy Gray

Green	<b>enforcement Training for Parish Councils</b>	<p>Extract from mins 22/10/19</p> <p>in the past Officers from within the enforcement team had provided training to local residents in order that they could be certified to issue fixed penalties. The number of tickets issued by such persons however was very limited because although they had received training catching the culprit in the act still remained a challenge. This was something Officers were prepared to take away and see if further training could be offered as it had been previously and if there was desire and need in the community</p>	<p><b>this is something the council have offered previously and can continue to offer should Parish Wardens wish to issue FPNs for matters such as dog fouling or litter. Any individual has to be authorised and receive specific training. Information on this provision can be outlined within the Parish Charter.</b></p> <p><b>Currently on hold due to COVID -19 rules - virtual training not appropriate</b></p>	01/02/21	Grant White
Green	<b>parish charter publicity and promotion and yearly impact review</b>	<p>approval to commence the publicity and promotion of the charter as per section 4 of the parish charter report.</p> <p>Also need to put in yearly review report as per section of the report</p>	<p><b>Publicity and Promotion of the Charter has had to be adapted due to COVID 19 . the adopted Parish Charter is now live on our website. It is available on its own webpage: <a href="http://www.west-lindsey.gov.uk/parishcharter">www.west-lindsey.gov.uk/parishcharter</a></b></p> <p><b>A page has also been created for Parish Forum events: <a href="http://www.west-lindsey.gov.uk/parishforum">www.west-lindsey.gov.uk/parishforum</a></b></p> <p><b>At the minute this page states we have no current planned events due to Covid-19 but that we are looking at a virtual event.</b></p> <p><b>GW Will liaise with Comms Teams and send out comms about this to Parish/Town Councils when we can also promote the virtual event so it's all linked up.</b></p>	31/12/20	Grant White
Green	<b>Questions relating to Wellbeing Lincs Annual Report</b>	<p>Extract from mins of mtg 14/7/20: - Councillor Young made reference to a number of questions he had submitted in advance of the meeting.....Officers advised the Committee that responses were being sought from the Partnership. Both the questions posed and responses received would be circulated to all Members of the Committee.</p>	<p><b>Awaiting a response from Wellbeing Lincs with more upto date information from 2019/20 rather than 2018/19</b></p> <p><b>As at 14 Sept information still awaited, further chases have been issued, it is hoped a response will be received before cttee next sits.</b></p>	20/10/20	Diane Krochmal

Green	<b>Attendance at future committee by WellBeing Lincs</b>	<p>Extract from mins of mtg 14/7/2020</p> <p>The Chairman confirmed future attendance by the Service Manager of the Partnership would be welcomed and Officers undertook to arrange this for a future meeting.</p>	<p><b>please work with cttee admin to arrange attendance - no date agreed yet. Officers meeting with Service Manager w/c 17/8 and will confirm date following the meeting.</b></p> <p><b>Future cttee dates have been shared with Well being Lincs attendance will likely be in early new year - looking at the workplan.</b></p> <p><b>Wellbeing Lincs have confirmed availability for Dec/ Jan and Feb Meeting . this will be added into the workplan at a date to be agreed at the next chairs brief</b></p>	31/12/20	Diane Krochmal
Green	<b>CCTV Case studies for Members Newsletter</b>	<p>extract from mins of mtg 14/7/2020</p> <p>Members felt it imperative that there was better reporting of outcomes directly resulting from CCTV intervention or information in order to improve public confidence. Officers undertook to publish some case studies in a future edition of the Members Bulletin</p>	<p><b>New comms and promotional material showing the use and impact of CCTV is planned to take place beginning January/February 2021. This timing coincides with comms on CCTV as part of the Safer Streets funded project to upgrade and expand CCTV in Gainsborough. In the meantime social media posts will be used to promote routine duties performed by CCTV where possible especially in the run up to Christmas and New Year.</b></p>	28/02/21	Grant White

# Agenda Item 6a



**Prosperous Communities  
Committee**

**Tuesday 20 October 2020**

**Subject: Consultation Response to Planning for the Future White Paper**

Report by:	Sally Grindrod-Smith, Assistant Director of Planning and Regeneration
Contact Officer:	Rachael Hughes Assistant Director of Planning and Regeneration, Development Contributions Officer  sally.grindrod-smith@west-lindsey.gov.uk, rachael.hughes@west-lindsey.gov.uk
Purpose / Summary:	To update Prosperous Communities Committee on the content of the recent White Paper consultation from Central Government on reforming the planning system.  To seek agreement to the proposed response to the consultation put forward as part of this report,

**RECOMMENDATION(S):**

- (a) Members are asked to endorse the conclusions of the report and the suggested response to each question.
- (b) Delegated authority be granted to the Assistant Director of Planning and Regeneration, Projects and Growth in consultation with the Chair of Prosperous Communities Committee to finalise and submit the response, on behalf of West Lindsey District Council, in the line with the content of this report and any comments made throughout the debate.

## IMPLICATIONS

### Legal:

None

### Financial : FIN/87/21/TJB

Whilst there are potential financial implications for the authority if the White Paper becomes national policy, there are no financial implications in making the response to this consultation.

However, the consultation does propose a number of initiatives which may have a detrimental financial impact;

Automatic refunds of planning fees if determination deadlines not met

Application fee refunded if Planning permission approved on appeal

Potential loss of income from developer contributions if a threshold is set for any new levy, replacing S106 and the Community Infrastructure Levy (CIL).

Statutory Planning Fees were last increased in January 2018 by 20% (previous increase 2012). The total budgeted income from Planning Fees is £950k.

### Staffing :

Whilst there are potential resource implications for the authority if the White Paper becomes national policy, there are no resource implications in making the response to this consultation.

### Equality and Diversity including Human Rights :

*NB: Please explain how you have considered the policy's impact on different groups (for example: young people, elderly, ethnic minorities, LGBT community, rural residents, disabled, others).*

### Data Protection Implications :

None

**Climate Related Risks and Opportunities :**

Whilst there are potential implications for how the Local Planning Authority plans for and manages development in the future and as a consequence of this White Paper becoming national policy, there are no climate related implications in making the response to this consultation.

**Section 17 Crime and Disorder Considerations :**

None

**Health Implications:**

None

**Title and Location of any Background Papers used in the preparation of this report:**

Wherever possible please provide a hyperlink to the background paper/s  
If a document is confidential and not for public viewing it should not be listed.

**Risk Assessment :**

N/A

**Call in and Urgency:**

**Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?**

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)

Yes

No

**Key Decision:**

A matter which affects two or more wards, or has significant financial implications

Yes

No

## Executive Summary

The 'Planning for the future' White Paper was published in early August and sees significant changes at both Policy and Development Management stages. The Government have stated it has the potential to alter the planning system more than any previous reforms since the inception of the planning system in 1947.

In the forward to the White Paper, the Prime Minister states that the government's ambition is to create a planning system which is *"simpler, clearer and quicker to navigate, delivering results in weeks and months rather than years and decades"*.

When launching the consultation, Housing Secretary Robert Jenrick MP said: *"Our complex planning system has been a barrier to building the homes people need; it takes 7 years to agree local housing plans and 5 years just to get a spade in the ground... We will cut red tape, but not standards, placing a higher regard on quality, design and the environment than ever before. Planning decisions will be simple and transparent, with local democracy at the heart of the process."*

Since 1947 planning applications in England have been assessed on a case-by-case basis against a long-term local plan, with permission ultimately decided by committee. The new system proposes to diminish this.

Land will instead be classified into three zones within a new Local Plan, with outline planning permission awarded automatically if proposals meet specific criteria within specific zones.

As well as introducing a zonal planning approach the White Paper also seeks to make changes to:

- The development of local plans
- The role of Councillors in Development Management
- Public Engagement
- Developer Contributions
- Design
- Enforcement

The main body of this report looks at these proposals and implications of the White Paper and seeks agreement on the proposed consultation response, appended to this report.

## 1 Introduction

- 1.1 The [\*Planning for the future\*](#) White Paper was published with much fanfare in early August as it has the potential to alter the planning system more than many previous reforms since the inception of the planning system in 1947. In the foreword, the Prime Minister makes it clear that Government views the planning system as the root cause of not enough homes being built in the right places – the justification for the proposal to *tear it down and start again*. He also clarifies that these changes will encourage ‘*sustainable, beautiful, safe and useful development*,’ that it will give ‘*a greater say over what gets built in your community* and that it *makes it harder for developers to dodge their obligations to improve infrastructure*.’ These are all principles that would be welcomed in the planning system. But, as is usually the case, the devil is in the detail!
- 1.2 The focus of the White paper centres on increasing the availability of new homes. It is widely accepted that there is a shortage of available housing in the UK and there have been a number of attempts in recent years to firstly cite the planning system as the main reason for this shortage, and then to make numerous alterations to both the policy framework and Development Management procedures in an attempt to fix the perceived problem. Despite this context of almost perpetual alteration to the system, authorities across the country approve the overwhelming majority of planning applications and in most cases can do little more to assist in the delivery of more housing.
- 1.3 There are currently between 800,000 and 1m houses that have been granted planning permission across the country but have not been built out, yet the White Paper consultation proposes radical change to the land use planning system as the means to address what is largely an economic problem.

## 2 Summary of the key proposals

### Zoning

- 2.1 The White Paper outlines that broadly speaking the planning system should move to one of zoning as happens in some other countries. To this end it proposes the following three categories would apply to all land within a district boundary as part of the local plan allocation process:
- 2.2 **Growth:** Applications for new homes, hospitals, schools, shops and offices in areas “suitable for substantial development” in Growth zones will be given automatic outline planning permission. Developers will, however, still need to secure reserved matters permission in accordance with locally developed design codes and “site-specific technical issues”
- 2.3 **Renewal:** Proposals in urban areas (i.e. densification and infill), on brownfield sites and relating to “small sites within or on the edge of villages” will be given “permission in principle”
- 2.4 **Protection:** Development will not be permitted in protected areas such as the Green Belt and areas of outstanding natural beauty

### **Local Plan proposals**

- 2.5 The government envisages “an altered role” for local plans, and local authorities will be given 30 months to produce new and intentionally stripped back plans. Failure to meet this deadline will result in some form of sanction.
- 2.6 All Development Management policy in future will be set nationally with the proposals explicitly stating “the National Planning Policy Framework would become the primary source of policies for development management” if the White Paper was enacted.
- 2.7 New look local plans will be restricted to zonal allocation of the three categories and the specific codes and standards to be applied to projects in the development zones need to be detailed at this stage.
- 2.8 Local planning authorities and neighbourhoods (through Neighbourhood Plans) are seen however as having “a crucial role” in producing design guides and codes to “provide certainty and reflect local character and preferences about the form and appearance of development”.
- 2.9 Local Plans would be subject to a single statutory “Sustainable Development test” replacing the existing tests of soundness.
- 2.10 As the housing targets will be set nationally they propose to remove the 5 year housing land supply requirement but retain the presumption in favour of sustainable development.
- 2.11 The White Paper also suggests that Local Plans could be adopted by the authority themselves instead of by the Planning Inspectorate via a public enquiry as happens now.
- 2.12 The length of documentation should be drastically reduced with the focus being web based maps, and all data should be machine readable to a set national standard.

### **The role of Councillors and Development Management**

- 2.13 The proposals represent a fundamental change to the planning system officers and members are familiar with by seeking to:
  - 2.14 *“Democratise the planning process by putting a new emphasis on engagement at the plan-making stage. At the same time, we will streamline the opportunity for consultation at the planning application stage, because this adds delay to the process and allows a small minority of voices, some from the local area and often some not, to shape outcomes”*
- 2.15 Determination deadlines to be firm deadlines of 8 and 13 weeks and no use of extensions of time as happens now. Automatic refunds of the planning fee if not met. In addition, if applications are refused but then subsequently approved at appeal stage then applicants would also receive an automatic refund of the planning fee.

- 2.16 Requirement for new, more modular software to enable machine readability of data set to national standard to automate routine processes and speed up the process.
- 2.17 Restriction of volume of supporting data for major applications to just 50 pages and standard nationally set conditions to be used.
- 2.18 Delegation of detailed planning decisions to planning officers where the principle of development has been established. This will therefore apply to all areas designated as 'Growth areas' and those areas designated as 'Regeneration areas, where the schemes accords with the already adopted design codes within the Local Plan.
- 2.19 Mandatory net gain for biodiversity set as a condition of most new development and all new streets will be tree-lined.
- 2.20 NPPF updated to allow a degree of permitted development for Listed buildings and conservation areas for energy efficiency measures and autonomy for suitably experienced architects so that no Listed Building Consent is required.
- 2.21 The paper also proposes a "quicker and simpler framework for assessing environmental impacts".

#### **Public Engagement**

- 2.22 The White Paper promises "world class civic engagement" at the local plan-making stage, with a focus on digitisation facilitating easier public access to planning documents. These will be published online in standardised formats with "digitally consumable rules and data", allowing people to respond to consultations on their smartphones. Engagement of the public at planning application stage however, will be significantly reduced as a consequence.

#### **Developer Contributions**

- 2.23 Both Section 106 agreements and the CIL would be scrapped and replaced with a new infrastructure levy calculated as a fixed proportion of the value of developments, above a set threshold.
- 2.24 Allow Local Authorities to borrow against Infrastructure levy revenues so that they can forward fund infrastructure.
- 2.25 In the short term, the government has proposed that First Homes should make up a minimum of 25% of affordable housing secured through Section 106, up to the introduction of the new levy.

#### **Housing targets**

- 2.26 Local Authorities will be bound by targets set using a new "standard method" for calculating local housing need at a national level instead of the locally calculated need at present.

- 2.27 This new methodology will be based on how many existing homes there are in an area, the projected rise in households, and changes in affordability.
- 2.28 The new standard method will also be the vehicle for the distribution of the national housebuilding target of 300,000 new homes a year.
- 2.29 As a result of this change councils will no longer have a “duty to co-operate” with neighbouring authorities when developing local plans.

### **Design**

- 2.30 A new body will be established to oversee creation of local design codes, and each local authority will be expected to employ a chief officer for design and place-making to oversee quality. Local design codes must have community input to be valid, using empirical evidence of what is popular and characteristic in the local area.
- 2.31 The government has also promised the imminent publication of a National Model Design Code “setting out more detailed parameters for development in different types of location: issues such as the arrangement and proportions of streets and urban blocks, positioning and hierarchy of public spaces, successful parking arrangements, placement of street trees, and high quality cycling and walking provision”.
- 2.32 In allocated Growth Areas individual site masterplans and codes will be drawn up by the Local Authority at local plan stage. Schemes that comply will be “fast-tracked”. In Renewal areas “pattern books” should be revived by allowing pre-approval of popular and replicable designs through permitted development.

### **Enforcement**

- 2.33 As local planning authorities are “freed from many planning requirements” the government foresees that they will instead be able to focus more on enforcement across the planning system.
- 2.34 As such the consultation promises to “review and strengthen the existing planning enforcement powers and sanctions available to local planning authorities to ensure they support the new planning system” and “introduce more powers to address intentional unauthorised development, consider higher fines, and look to ways of supporting more enforcement activity”.

### **Delivering Change**

- 2.35 In order to minimise disruption recently approved plans and existing permissions can continue as planned and they have already introduced new permitted development rights making it easier for businesses to change use and for new homes to be built on top of buildings as well as demolition and rebuild without the need for planning permission.
- 2.36 In addition they are also consulting on short term measures to:

- Change the standard method for assessing local housing need
  - Securing First Homes through S.106
  - Lifting the affordable housing threshold from 11 to 40 or 50 units
  - Extending current Permission in Principle to major developments for housing sites
- 2.37 They will ensure that investment in new public buildings supports renewal and regeneration of town and city centres and explore how disposal of publicly owned land can support the SME and self-build sectors.
- 2.38 They will develop a comprehensive resources and skills strategy for the planning sector to support implementation.

### 3 **Implications of the proposed changes**

- 3.1 The notion of streamlining the local plan process in principle is welcomed but the proposals do not provide the detail to assess whether it will deliver positive outcomes, nor do they adequately explain how such streamlining can take place whilst simultaneously expanding public engagement at this stage and increasing the level of work by Local Planning Authorities to create masterplans and design codes as part of the plan. Removing the duty to co-operate will also remove the ability for infrastructure to be considered across boundary in a strategic way.
- 3.2 It is concerning that beyond the local plan stage community and member engagement does not form a prominent role which seems to run counter to the idea that the system will improve such engagement. Local planning Authorities should be empowered and adequately resourced to act as master developers ensuring local plans deliver real change but the extension of Permitted Development rights recently introduced and other measures will firmly erode this role. Recent changes to Permitted Development rights have prevented councils from being able to protect local residents against poor housing standards and poor quality places so it is disappointing to see such rights extended further. In addition the short term plan to increase the affordable housing threshold from 11 to 40 or even 50 will mean that there will be a significant drop in the number of affordable houses secured in West Lindsey/Central Lincolnshire as many of our housing sites are below this number.
- 3.3 Whilst having a single charge instead of S.106 and CIL is a good idea in theory the suggested mechanism (setting a minimum threshold below which it won't be charged) could see lower value areas where viability is often an issue such as West Lindsey/Central Lincolnshire securing very little if any funding. This will be a problem for all forms of necessary infrastructure but in particular will severely hinder our ability to deliver affordable housing. Local Authority borrowing against projected receipts is high risk as the sum collected for one scheme rarely pays for a whole piece of infrastructure, so it would require a financial leap of faith based on a series of assumptions and could lead to significant debt. There is also no mention of how non-financial requirements would be secured as

they are currently under S.106 such as the developer providing a school or other community facility in kind.

- 3.4 It is disappointing that with the exception of seeking to introduce a Biodiversity Net Gain as part of development the proposals do not go far enough to meet ambitious targets to reduce carbon emissions and affect climate change.
- 3.5 As councils would be forced to take account of every conceivable eventuality over a 10-year period while developing the new local plans and legally-binding long-term zoning allocations likely to lead to an increase in legal claims from landowners and developers who might see sites zoned unfavourably or undesirably– there is certainly scope within the proposals that rather than simplifying and accelerating the planning process, the White Paper may inadvertently create logjams where currently there are none.
- 3.6 Whilst additional engagement with residents at local plan stage is welcomed it will be very difficult to secure any form of consensus regarding good design as part of any design code work. The paper suggests looking at what is popular and what the area currently has as queues to influence the codes but in many instances neither of these things will lead to good quality design as popularity cannot be relied upon when the country is suffering a housing shortage, nor should reference be taken from many established areas in design terms if those areas are poor quality. It also fails to explain who arbitrates and has the final say on design. In addition using such a formulaic method will hamper innovation, variety and exemplars which are all needed to create high quality places.
- 3.7 Due to the position of our current local plan and the suggested transition arrangements Central Lincolnshire would be in the position where the current local plan review would run its course with implementation in early 2022, and almost immediately after that the new local plan creation would need to commence.
- 3.8 Setting the determination targets of 8 and 13 weeks as hard deadlines and reducing the ability of authorities to use extensions of time will result in more applications being refused as in almost every case the extensions are required to allow for further information from the applicants to be submitted and not because the LPA simply wants more time. As the proposal also includes an automatic fee rebate if refusals are then overturned at appeal this could also significantly increase the financial exposure to the council.
- 3.9 The paper fails to acknowledge the considerable time, expertise and resource required for LPAs to effectively masterplan sites at Local Plan stage and relying on a proportion of the Infrastructure Levy to cover such costs as suggested is unlikely to cover this cost. As submissions will not be allowed to exceed 50 pages to cover all aspects this will need to be front loaded by the LPA at significant cost and time. Archaeology,

contaminated land, flood risk assessments, biodiversity statements etc. will all need to be carried out at this stage before sites can be allocated.

- 3.10 Allowing qualified professionals the scope to carry out works to listed buildings is risky as work that is found to be inappropriate or not complying with the rules cannot simply be undone, any features damaged or removed would be lost forever. It is also impossible to create a set of rules for this as every building is different and the value of certain features differs also. Unscrupulous individuals could employ such professionals to achieve the outcome they desire.
- 3.11 There is no detail as to how the new enforcement powers would work in practice. The White Paper is silent on the use of expediency if the rules have been broken, and on whose interpretation of the rules count. Equally it does not explain how the LPA determines whether any breaches have been intentional.

#### **4 Next steps**

- 4.1 The consultation is open until October 29 2020. Subject to the outcome of the consultation, the government “will seek to bring forward legislation and policy changes” to implement its reforms acknowledging “we have not comprehensively covered every aspect of the system, and the detail of the proposals will need further development pending the outcome of this consultation”.
- 4.2 The proposals will require primary legislation followed by secondary legislation and an updating of the National Planning Policy Framework.
- 4.3 At the time of drafting this report none of the key organisations within the sector have issued their formal response to the White Paper but the members of the Central Lincolnshire Joint Strategic Planning Committee have endorsed an officer report highlighting the same planning policy concerns of the White Paper and whilst as a Planning Policy body they will be submitting a formal response to the consultation it has also been agreed that each district will also submit their own response.
- 4.4 A workshop was offered to all members to attend to discuss the implications of the White Paper for West Lindsey, its communities and residents. This was held on 07<sup>th</sup> October and all discussion points and comments were collated and added to the West Lindsey response.
- 4.5 Appended to this report is the list of questions posed within the White Paper and the response to each question as suggested by officers and members at the workshop.

West Lindsey District Council  
White Paper Questions & Responses

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

Managing sustainable development

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

Yes. As a Local Planning Authority we are at the heart of and are responsible and accountable for the democratic planning process of:

- promoting and adopting the local plan,
- representing communities through consultation and Member involvement
- making transparent, robust and defensible planning decisions, and
- supporting the delivery of Neighbourhood Plans.

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?

Improved online access and digitisation of planning is wholeheartedly welcome, however as an LPA we have serious concerns over how this data can be made machine readable in a nationally standardised format, and how this and any new digital platform and IT system will be funded. Smaller District Authorities do not have the finance in place to commission new IT systems and as such there is a concern that those smaller Authorities and their communities will be disadvantaged if a standardised system for all LPAs isn't rolled out nationally to ensure equitable access.

Equally as a rural district there are currently significant challenges for rural communities to fully engage in the digital world of consultation, where broadband coverage remains sparse. It is acknowledged and supported that access to 3D and digital imaging is a significant benefit for those affected by development as much those who are making the decisions. With this in mind how will the aspect of download speeds and equitable access to broadband to enable this be levelled up?

It is also important to understand that different people access information in different ways and they also have differing levels of interest in development and land use planning.

As such any over-reliance on a single method of communication or reliance on members of the public to actively seek out information without it being brought to their attention risks marginalising parts of society.

The proposals lack any meaningful detail of the expectations of the new system and the costs and barriers to delivery are simply unknown. There are also reservations how a nationally accessible data system will operate in terms of by whom, the funding and the accuracy and responsibility for the data accuracy, particularly in relation to flood mapping.

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

It is impossible to pick just three priorities from this list. As a Local Planning Authority all of the issues are priorities. Ensuring balance between all of these requirements and reflecting the needs of the community, economy and environment is essentially what the planning system is for.

Undue focus on one particular area or issue or omission of a single area can result in severe negative consequences that could take many years to rectify at great cost and leads to mistrust of the wider planning system.

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

No. Whilst the principle of speeding up the plan preparation process is supported, there is concern as to how the expectations for developing a robust evidence base and the meaningful engagement with communities within a 30 month timeframe could be achieved.

It is considered that the proposals put forward could significantly dilute the role of the Local Planning Authority, specifically in relation to the role of members and meaningful public participation.

The importance of establishing appropriate locally led design codes and detailed matters determined for specific areas and sites being identified for Growth or Renewal could be overlooked in the rush to adopt a Local Plan in such tight timescales. It is also considered that the three basic zones are too limiting, particularly in relation to rural areas and countryside.

The additional emphasis on design codes and implication of consent for certain allocations means that more detailed work will be required as part of the local plan process which will take more time and cost more money to achieve. Equally, the White Paper does not adequately explain at what scale such codes and allocations should apply and how Local Planning Authorities should resource this costly work. Much of this work is usually dealt with by planning consultancies working on behalf of an applicant and using a range of specialist consultants (Highway specialists, archaeologists, flood risk experts, ecologists, urban designers etc.) the majority of whom are not part of LPA teams partly due to the continual reduction to Local Authority resources in recent memory, and partly because this has rightly always been the responsibility of applicants and not a cost to the tax payer.

That said if community engagement is properly addressed at the start of the process and greater capacity and expertise is established at a Neighbourhood Plan level, essentially providing that Master Plan for the zoned areas there are elements of the proposal which could work well. It could provide less ambiguity and potential for appeal. Substantial thought would need to be given to how in a zonal planning system, strategic and local infrastructure would be delivered, particularly where policy at a local level would be more 'piecemeal'.

If it is considered that key minimum standards set at a national level in relation to design, green spaces and quality, this would provide a positive framework to develop the proposal as well as a the wholesale raising of Building Regulations across the board to support the broader environmental aspirations at a National and Local level.

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

No. Whilst the standardisation of such generic policies is generally supported for some defined constraints such as flooding and heritage, to prevent duplication, it is essential that they have adequate coverage for the entire country and that it provides enough flexibility for Local Planning Authorities to take a local approach to locations where specific circumstances dictate such. Acknowledgement of green wedges or Areas of Landscape Value for example in the rural context of West Lindsey have value to the setting of settlements and their communities.

Establishing far reaching policy at a National level increases the risk of Government subsequently amending these generic policies which fundamentally changes the protection that they offer and effectively undermine location-specific policies, leaving areas without adequate protection. Conversely this could also lead to a level of inflexibility, stifling local areas and leading to a greater number of application seeking a departure from policy, which is not a positive approach to planning.

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?

No. In principle, the idea of streamlining Local Plan procedures including tests of soundness and Sustainability Appraisals are welcomed and these could ease the resource burden for Local Planning Authorities. However the importance and thoroughness in particular of Sustainability Assessments must not be effectively ‘watered down’ through any streamlining as these assessments sit at the heart of good plan and decision making. It is essential to understand that sustainability is not solely about environment; social, health, economic factors to be considered independently.

Impacts are intertwined and therefore assessments must be at an appropriate level of detail to ensure that development is sustainable and associated impacts are understood. Equally how would factors proposed by the Environment Bill be captured and assessed?

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

It is difficult to see a method for achieving this in the absence of a duty to co-operate. The Duty to Cooperate works well in many areas. Areas where it works less well tends to be where there is the greatest pressure for development and an inability or lack of desire to meet needs within an administrative area. If these areas can be identified they could be addressed through joint working, with housing and other strategic, cross-boundary requirements and challenges being amalgamated to a wider geography and planned for at a different scale.

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

No. The principle of setting housing requirements nationally is supported as it will remove the lengthy and time consuming debate locally, but there has to be a reality check on the outcomes of this otherwise the national targets will not be achieved.

There are also questions about whether the 300,000 dwellings per year target is still fit for purpose with key national and international events such as Brexit taking place

in recent years. This target should not be followed blindly, but should be checked for relevance in terms of environmental impacts and for whether it is deliverable in terms of market saturation. Many parts of the UK, particularly in areas characterised by deep rurality and small market towns have a more fragile economic basis leading to marginal viability and slower pace of sales. Flooding an area with permissions will not necessarily mean the Market will deliver them. This is already demonstrated with the Government's own research demonstrating over 800,000 homes with permission which currently remain undelivered.

Whilst it is agreed that assisting affordability is a valid reason for delivering additional growth and should be used to help determine where development should be located, this is often due to the constraints present that limit development occurring – this should not result in pressure to develop homes where it would cause unwanted implications.

Any nationally-set targets must also bear in mind some degree of market saturation. Given that delivery of homes is so reliant on delivery by the market in recent years and the market will not want to deflate the values realised on the sites being delivered it is essential that any local figure is deliverable. Ensuring a variety of housing products is a step towards extending delivery beyond normal market saturation, but the limitations of any system which relies on the market to deliver is making land available – this is something that has been achieved up and down the country in the current system.

A proposal that removes the five year land supply as a barrier to proper planning is supported. But it has to be recognised that the Five Year Land Supply and HDT are not based on making land available but homes being delivered and this is often out of a LPAs hands to a large degree. The ability to deallocate sites that are not progressing in favour of alternative sustainable sites that are deliverable in a regular plan review (or partial plan review) would be more favourable. Having more sites in the supply can reduce certainty and can act as a barrier.

In short, any standard national method has to be based on evidence that it will be deliverable, taking into account market capacity and constraints, and will lead to sustainable development, otherwise it will risk failing in achieving national targets.

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?

No. It shouldn't be the only factor. Whilst the principle of taking into account local affordability and the size of existing urban areas is a sensible component of any calculation, perhaps wider factors need to be considered such as investment in infrastructure or job creation for example. In areas where joint plans are produced this needs to be carefully considered to ensure sufficient levels of sustainable development take place to support communities and to support growth and regeneration especially in areas of deprivation. It is also unclear how the creation of sustainable new settlements and garden villages and towns would be factored into such an approach. Continually extending urban areas is not always the best approach for delivering growth sustainably and managing unaffordability. However, provided that the numbers required of an area are deliverable in a sustainable manner and the Local Planning Authorities have the ability to plan for this growth then this approach is acceptable.

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?

No. In theory this is a good idea but there is serious concern that there is an absence of understanding around the amount, complexity and cost of work required at the local plan stage to accommodate this goal. There are even now many technical constraints could prevent allocation even in principle, without layering on automatic outline permission in Growth areas. This coupled with the 30 month timescale to produce Local Plans leaves communities vulnerable to unsustainable and poorly considered development which has very few checks and balances further down the line. This is particularly pertinent as this approach also erodes the role of Members in the decision making process, removing an opportunity for Members to act in the interests of the Community in which they represent. In many Local Authorities, including West Lindsey a high proportion of decisions are already delegated. It is acknowledged however that the theory of this approach appears to remove some of the potential double counting, where sites are assessed for similar constraints at different stages, however the current system allows flexibility and for development sites to respond to the economic, social and environmental circumstance in which they come forward.

At present, allocation in a local plan effectively agrees the principle of development on the site, paving the way for a developer or land owner to produce an acceptable concept plan as part of an outline application or a deliverable permission in a full application – often in conversation with the Local Planning Authority. It is not considered that this proposal will speed up the delivery of sites but will merely shift the responsibility of concept design to the Local Planning Authority which the developers may not wish to deliver anyway. A version of this approach is often seen with landowner led outline applications, which are prevalent in rural areas. Very often the land owner will agree a level of detail at outline, then sell the site only for the developer to come in and vary the permission to make the permission deliverable and viable. This only adds more mistrust into the process for communities as very often they feel the permission delivered is not that which was originally permitted. Equally as market conditions and societies needs change previously worked up Growth zones and associated design codes may become outdated and not fit for purpose again leading to either non-delivery or an application to depart from established policy.

It is considered that the blunt zonal planning approach offered in the White Paper does not fully take account of the nuances or needs of a rural area and three categories alone could easily serve to see an area overrun with development and fundamentally change or stifled, without scope to grasp opportunities as they arise, particularly in relation to farming and other rural economic needs, including the ability to efficiently embrace diversification and modernisation or respond appropriately to climate change.

Furthermore even with state of the art consultation tools, the timescales covered by a Local Plan and the technical nature of evidence can make engagement challenging for the public. There is a sense of detachment in the process, up until the development becomes a real proposition. As such the public typically do not engage in early stages of plan making process and there is a real concern that Communities would miss out on meaningful engagement opportunities.

If this approach is to be implemented it will be essential for clear guidance on what will be covered in the permission issued by a local plan and for local plan teams to be properly resourced for such a service, both in delivering the technical information and also for engaging appropriately with communities and Members.

Overall it is considered that if this was a future option, then again Neighbourhood Planning would have a huge role to play and therefore greater technical support and capacity would be needed to enable this approach.

It is also important to note that this proposed change in permission statuses would require the scope of a Reserved Matters application to be expanded to cover site specific matters for instance, surface water drainage / SUDS, archaeological investigation (on sites within areas with archaeological potential only?), and ecology/ biodiversity net gain. It is not considered feasible to front load this level of site detail at a Local Plan stage, even within the new system as suggested by the White Paper.

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

No. Not in its simplest form as presented in the White Paper. The current local plan process effectively approves the principle of development and permission is usually granted fairly swiftly provided a suitable scheme is put forward. Likewise a Local Plan policy can set out some of the site-specific requirements or parameters, and a LDO can be used to obtain a permission. It is not considered that a fast-track planning application process in this way is necessary. Further nuanced approaches to obtaining planning permission only adds more confusion for the general public. Many find the process of 'prior approval' difficult to navigate. Equally we don't feel that introducing a system which will require applications for departure from the established zones, where a scheme does not exactly fit with is a positive method of managing growth and development.

A renewal zone could be used more effectively to support the reuse of brownfield land, like a subzone and the refurbishment and repurposing of existing buildings, be it a heritage asset or a piece of land that has not been redeveloped through the usual market channels, for example where there has been market failure or other significant constraints which make reuse challenging. Where areas, buildings or pieces of land have been identified as 'renewal areas' through evidence a fast track option of alternative finance options or other enabling tools would be very useful. Both in terms of reusing existing built on land and or preserving and protecting existing heritage assets. This approach would also encourage a more sustainable approach to the built environment.

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

No. Not that alone. The delivery of a new settlement is a challenge and often will require land assembly, close relationships with infrastructure providers and delivery partners. The Local Planning Authority in which the new settlement proposed would have to be, at the very least, included as a key stakeholder throughout the process. A Local Development Corporation or similar vehicle could be beneficial to ensuring the delivery of these settlements in a more timely, efficient and coordinated way, ensuring characteristics, issues and opportunities within the local area are given appropriate weight and consideration.

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

No. Applications are already dealt with as quickly as Local Authority resources allow, (up to 95% of all applications determined in England) and the use of extensions of time are invariably at the request of the applicants and so they are happy to follow this route. By eliminating Extensions of time it will result in more applications being refused and/or due to the proposed sanctions around refunds at appeal could see poor development

approved due to the consequent financial risk to the authority, in direct conflict with the Government's other objective to build beautiful with a clear focus on quality development through design.

By delegating decision making down to planning officers it also runs a risk of lack of consistency in decision making. Planning is a complex process and cannot be over-simplified to attempt to increase certainty in the same way that the law is complex and needs detailed bespoke interpretation, nuanced decisions and therefore also cannot be over-simplified to increase certainty.

Equally the continued dilution and erosion of local Member involvement in the planning making and decision process only creates further concern around transparency and takes away the opportunity for an elected member to properly represent and support a community in relation to, often, very emotive areas of work.

Often the requirements for information supporting a planning application, of any size, is a result of the location of the site. Furthermore, some complex sites need more evidence to justify how these complexities have been dealt with satisfactorily and so arbitrarily limiting statements to 50 pages could undermine developer's ability to make their case. Whilst it may be possible to create a standardised list, and we support the principle of reducing unnecessary paperwork and information, great care is needed to help ensure that Local Planning Authority get the right information of a suitable standard to ensure decisions made are sustainable and do not result in undue harm.

More information is needed about the new systems being proposed to be able to provide detailed response to how these could operate in practice, but greater standardisation of systems across Local Planning Authority, would be beneficial if correctly delivered and funded.

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

In theory we support the principle of a web-based local plan with a heavy reliance on the map. At present, in legal terms, the map carries little weight when compared to the wording in a local plan and so greater integration of the two in legislation may be needed. The reduction in use of paper is also supported but this needs to be balanced with ensuring that interested parties without access to the internet can gain access, to ensure that certain demographics of the population are not effectively 'cut out' of the process. It must also be acknowledged that many rural areas do not have broadband capability and as such access to system such as these may be impossible or impractical due to download speeds. How will the Government ensure that rural communities will not be significantly disadvantaged through the planning system without a wholesale and timely improvement of internet access across the Country?

There is no detail in terms of how this will work in practice, specifically how long it will take to put in place, will it be retrospective and how is it funded? Local Planning Authorities will need to be provided with substantial additional resources including staff, IT support, training and IT equipment in order for this to be delivered successfully. Equally there is a concern in relation to some of the smaller and more remote districts being able to secure the appropriate level of skills from the market place to implement such a significant GIS project. Will there be enough specialist capacity nationally in order to ensure that the project is deliverable within the timescales across the country.

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

No. Notwithstanding our objections to the proposed changes to the system, whilst the ambition of shortening the process as far as is practicable is welcomed, the required work to enable allocations to effectively benefit from outline permission, the creation of design codes etc. is likely to take longer than the current process unless significant resourcing is given to each authority. The proposal for 30 months is unrealistic.

Furthermore, the timetable suggested allows for no time to take account of feedback on proposals as under the current system (the regulation 18 consultation) – this is an important stage to consider comments received and make changes needed prior to submitting. If the public's ability to comment on applications is to be limited then it is essential that they can help shape the plan.

The proposal for a statutory duty for LPAs to adopt a new plan within 30 months is absolutely not supported. Detailed challenges (including the time and resource requirements listed above) such as a lack of land suitable to meet housing need being put forward, identifying land for gypsy and traveller sites, developing evidence to ensure decisions on zones are sound, etc. mean that this timescale is unrealistic and councils should not be unnecessarily penalised for failing to achieve it for reasons outside of their control. It is more important to get things correct in a timely manner, than rushing to come to an incomplete or inappropriate conclusion very quickly – this could undermine the system and ultimately slow delivery.

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

Yes, however the proposals are not clear what role neighbourhood planning would have in the new system. They can be an important tool to allow communities to deliver sustainable growth that is right for their locale at a finer grain than the Local Planning Authority, particularly under a joint strategic local plan. It is recommended that neighbourhood plans become more focussed and specific as currently there can be a lot of duplication with national and strategic policy which often they introduce confusion or some conflict with local plan policies where they repeat or slightly alter the higher order policy. Perhaps the introduction of design codes, alongside greater ability to allocate sites would be the best route for focusing these plans for the greatest output.

If this were to be the case however, it is considered that more resource should be provided in this area. It must be remembered that very often Neighbourhood Plans are developed and led by lay people and volunteers, where greater emphasis is placed on these documents to protect, enhance or grow any area there must be adequate support to enable communities to achieve this effectively.

Equally communities must not be disadvantaged where there is not a group of individuals wanting to develop a Neighbourhood Plan or not having the skills to do so. Very often it is an engaged and motivated village community with an already active Parish Council who develop these documents. There are opportunities for the Member to act as an advocate in the area of work, however extensive training and support would be required to ensure this is effective.

Fundamentally the Local Planning Authority does not want to see areas disadvantaged where community engagement and cohesion is not so prevalent. What protections and

equally opportunities will be given to these communities through an arbitrary zonal system and nothing else?

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?

Similar to the response to Q11, in order for Neighbourhood Plans to move towards a more digital basis, significant levels of training, support and IT knowledge will be required especially supporting local groups, Town & Parish Councils undertaking Neighbourhood Plans. Greater access to free and easy to use map services and map data would be beneficial. The Public Sector Mapping Agreement does not cover neighbourhood forums meaning that these groups can find it difficult to obtain such OS based data. Is there or will there be a national body set up to manage this process and ensure parity across the Country?

Again the question is also raised around ensuring all communities have good quality access to broadband and that download speeds are appropriate to ensure fair and equitable access to information.

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. It is clear through the existing evidence that across the country planning authorities have already played, and continue to play, their part by issuing timely planning permissions so there is little more that can be done to ensure the delivery of permission granted.

Instead of seeking to impose sanctions on a sector that already delivers, measures that apply to land agents and major house builders should be implemented if we are to see increased delivery. Measures such as charging council tax per property if not constructed after a prescribed period beyond the consent and based on standardised delivery rates for the area should seriously be considered as they are more likely to be effective.

The proposal to seek a variety of developers on large sites may take time to implement, but potentially through a master-planned approach on large sites, if a variety of builders show an interest there need not be any reason that this cannot be achieved. However consideration on this approach must be given to how liabilities for the provision of infrastructure and obligations are apportioned to ensure that it is fair and equitable and not a barrier to delivery. Equally understanding the capacity of a site to deliver with multiple developers on the site must also be understood. It is already acknowledged that more than 3 developers on a site at one time becomes inefficient due to basic logistics around deliveries, space for welfare and material storage.

The same issue would apply with multiple SME builders all taking on a large site. Also the time taken for multiple SMEs to build out a large site would be significant, meaning households could be left living on a building site for years, with the risk of other builders on the site not completing their development or not even starting.

Issues like these are always influenced by the market and SME builders are often more vulnerable to cash flow issues and, where a small downturn in the market occurs, are much more likely to 'mothball' a site until the market picks up. This could create particularly unpleasant living conditions for those already on the site, without access to key facilities and infrastructure due to be delivered in later phases. Likewise, seeking to vary the products coming to market will help with delivery, but fundamentally it is all

about the bottom line for developers to make money and this is not within the control of Local Planning Authorities. To ensure a continued and secure pipeline of housing alternative delivery options should be considered which don't wholly rely on private enterprise and market forces.

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

We are very supportive of good design and feel it is necessary to see a significant step change and improvement in this area, considering, not just aesthetics but also what as a society are we likely to need in the future, can the design work for scaling up and down, how does design influence the environment, ecology and climate change?

It must be noted that design should not be the same across the country and 'off the peg' house boxes are not appropriate on every large development up and down the country. It is considered imperative that Climate change should be a key aspect of design and function. This does not have to be entirely led by the planning system. A positive lifting of standards within the Building Regulations nationally could significantly support this area of work, particularly the need for all new builds to meet a specific thermal efficiency, utilise renewal technologies and embed rain water harvesting opportunities as the norm.

From a local perspective in West Lindsey and supported through the Central Lincolnshire Local Plan, great care is taken to strive for the best design outcome possible for each site, taking into account all planning constraints. There are a number of examples where this has been achieved to a high standard, however there are also occasions where design may have fallen short of these expectations. Very often when dealing with developers who have fixed house types and predetermined layouts designed to achieve land efficiencies and maximise returns, irrespective of the area in which the development is situated. This issue usually driven by the price paid for the land and then a fixed developer return.

Equally design is very subjective so it is not possible to achieve collective unity of opinion on the built environment. It is important that we consider context, separate taste preferences from good design and use both creativity and pragmatism in securing a solution. There is a key role for local communities through Neighbourhood Planning with design codes, where properly supported, resourced and funded.

There has been a noticeable difference in design quality between developers who work well with local authorities through pre-application advice and applications to get the best outcome and other developers who take little note of the context and submit homogenous housing types with a preference for taking an application to appeal when the LPA rightly refuses the application. Too often design has not been defensible at appeal.

Another issue experienced is from land agents whose sole business is securing an outline permission to sell a site on. Often the outline permission is acceptable based on the information provided, but when a developer buys the site the scheme is implementable and a change to the scheme is needed often resulting in compromised design or reduced contribution to much needed infrastructure.

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]

All of the above and more as we cannot achieve sustainable growth without each area. Sustainability also is not only about the environment and so this list is far too limited to allow full consideration of what is sustainable in an area as it balances the competing challenges.

It must be recognised that a 'one size, fits all' approach to planning and development does not work. England is characterised by its diversity in character, density and landscapes and that variety can be encapsulated within a single District, therefore a short list of sustainability measures, comes nowhere close to ensuring that future policy maintains sustainable development across that breadth of diversity in need and function. In rural districts the approach to ensure ensuring sustainable development and encouraging economic stability and growth is very different to that of a market town and then conversely to a city. There is an argument that since the introduction of the NPPF in 2012 there has been a gap in policy to support rural communities, specifically when grappling with the issue of sustainability, where very limited infrastructure exists and other ecological factors are also a priority.

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

No. The principle of embedding good design at the heart of decisions is supported, but it is not without its challenges.

Whilst the use of design codes in certain circumstances, such as part of urban extension planning or for rural communities can be a useful tool, considering the built environment in this way is far too simplistic in urban areas. Codes won't work for huge parts of the country. Areas which are rightly characterised by their significant variety in terms of design, materials and street-scape would be impossible to deal with in this manner. It also creates undue uniformity and lack of variety as well as stifling innovative and clever bespoke design solutions. Design codes can also have an impact on the viability of a scheme, the imposition of a fixed design code on a low viability area could seek to stifle development opportunities.

The answer is to upskill planning authorities specifically in relation to urban design and then increase the weight given to design in decision making within the policy framework nationally and locally, that way design can be considered with more confidence and in the context of each scheme. In addition as design is subjective it will be impossible to secure a consensus with the local community and whilst increased input should be welcomed at local plan stage we express a note of caution about allowing the local community to direct the design approach of an area – particularly when as suggested we use local popularity as any form of measure. In the context of a national housing crisis where demand is far outstripping supply how can 'what is popular locally' be relied upon as a measure of design quality that should be replicated? Furthermore who arbitrates on a solution where the community either disagree with each other or disagree with the trained, experienced professionals?

Given the overall size, number and variety of settlements and landscapes and characters of West Lindsey in the context of Central Lincolnshire, producing design codes needed to provide satisfactory guidance would require significant resource and time. This has the potential to delay growth. Considerable investment would be essential to ensure such a service is established in advance of it coming into place. Clarity is needed about where funding for this additional burden on Local Planning Authorities will be found. Finally how will design in terms of promoting ecological improvements and net gain be dealt with? As part of the 'catch all' design term of in some other context?

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. Having a Chief Officer responsible for design and place-making is a positive step and a new body to support this approach is also welcomed. If this new approach is to be introduced then it is essential that this body is in place and the necessary resource and technical capability is made available before it is introduced into the Planning System. The concept of provably locally-popular should also not be the cornerstone of what is good design.

However, our view is that the focus should be about upskilling local authorities to secure good design on a site by site basis as opposed to guidance on creating design codes. As well as ensuring that design principles enshrined in policy are given much more weight in the decision making process. This should include not only the aesthetics of a scheme, but also space and use and also environmental and ecological credentials. Equally any design guidance needs to cater for not only an urban setting but also rural areas, responding to the challenges and opportunities rural developments provide. 19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

Yes. Good design should be central to homes being built by all developers and Homes England funding should be structured in a way support this, particularly in low viability areas where design suffers where values are difficult to achieve. Very often schemes which come forward in low viability areas are put forward as uninspiring and low quality developments, which instead of drawing up and area, quickly deteriorate and compound issues.

In order to build markets in 'forgotten areas' of the Country and instigate regeneration, Homes England should be set up to actively promote and support good design through funding and capacity and not be wholly focussed on land value up lift which in these forgotten areas is virtually impossible to achieve, continuing the downward spiral of left behind areas!

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

No. What is beauty? How is it defined? How would this be decided? What is considered beautiful in one context may be considered decidedly ugly in another. The concept of 'beauty is far too simplistic and superficial in a process which is required to balance numerous conflicting and complex issues.

Equally, good design should be an absolute pre-requisite on all sites and focus should be about equipping local authorities to confidently refuse poor or even mediocre design every time. The legislation needs to be couched to support 'is it good enough to approve' instead of 'is it bad enough to refuse'. Beauty is but one element of good design, layout, space, function, longevity and environmental credentials are other factors and these inputs are inseparable. Just because a proposal is beautiful does not mean it is well designed, practical to live in or good for the environment, in terms of climate change and ecological impacts.

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

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

Other. All of these elements are important for achieving sustainable development. Planning is about delivering all of the above in a balanced way. Focusing on one area to the detriment of others and is poor place-making. The proposals in the White Paper whilst seeking to simplify the planning system, which in some parts is welcome, does not recognise the nuances and interdependences of balancing conflicting priorities and promoting positive place making. Nor does it recognise the wider context of place and the relationship and connectivity through physical infrastructure as well as social and economic dependency of an area, which may stretch beyond a Local Authority or Neighbourhood Plan boundary. How in a zonal based system will this be established, promoted and delivered?

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?

No. Whilst having a single tariff appears to be a simple approach in theory, the idea falls apart for huge parts of the country which will be caught in the consequent viability gap. In these locations there may be little if any infrastructure levy secured and so the ability to secure any infrastructure would be lost. Furthermore there is no mention as to how non-financial contributions needed to make a scheme acceptable would be secured as they are currently under S.106. Community Infrastructure Levy itself was introduced to simplify and speed up developer contributions, however it has become an industry in itself and is not at all straightforward in its processing, particularly with the number of exemptions and relief. The concept of simplification for this process appears to work well on paper but not in practice.

It is considered that this section of the White Paper is so underdeveloped that it is impossible to make proper and full comment on the proposals drafted. It is also considered that a standard nationally set tariff is another step towards centralisation of the planning function, which removes Member and community involvement. This is not a welcome prospect and calls into question the opportunities for local democracy and decision making to reflect local needs and priorities.

The current Community Infrastructure Levy, whilst badged as a more simplistic and efficient way of collecting contribution for infrastructure does in itself introduce a separate and lengthy examination process, a disproportionate burden of Local Authorities to administer it, especially when rates are low, due to marginal viability. 5% on £15 per sq.m does not provide the revenue needed to administer the process and leads to the Local Authority funding the process. The % based administration fee favours the higher value areas, enabling them to build capacity into the process, implement improved IT systems and consequently obtain further CIL receipts.

The CIL process also creates a huge amount of bureaucracy and paperwork, particularly in connection with Self-Build exemptions and other reliefs, which require the same, if not more, administrative processes for nil return for both the collecting/charging authority and the local community. Any new tariff should be applied across the board without exemptions and relief. If we are serious about funding infrastructure from development then it must be understood and accepted that all development for whatever purpose creates an impact on local infrastructure and should therefore make a contribution.

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

Locally. However the process to set the rate should be reviewed to ensure that it doesn't create additional resource burdens on the Local Authority and become too onerous. A more transparent approach to the calculation of land value and the subsequent uplift in value gained by achieving planning permission should be considered to simplify the approach to establishing local viability. Whilst the Existing Use Value plus, starts to go some way towards this, the method for calculating the multiplier then applied is still not clear or transparent, leading to projected negotiations at examination. A centrally set approach to the multiplier would support this process, as the valuation of existing use is a more established universal practice.

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. If authorities have a sound local plan then it shouldn't be possible to secure more, nor less than the current system as this has been calculated locally as part of the local plan process and based on localised evidence. The benefit of planning permission should be fairly, equitably and transparently apportioned between the parties; specifically the landowner, developer and community.

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

Not sure. There is no objection to allowing this flexibility but we would object if this became an expectation or even requirement due to the significant risks around pay back as it is based on presumed delivery. This again is more of an issue in areas of lower slower growth and/or areas with marginal viability.

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

Yes. Although it is difficult to understand how this would be achieved in practice. It would require clear linkages between Development Management, Monitoring and Building Control. Where these services are all provided in house it would be easier to achieve, however information that is required to be provided by approved inspectors is notoriously limited in detail and slow in submission, which would make this process either excessively time consuming in relation to cost v benefit or completely unworkable.

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. The delivery of affordable housing is essential for local communities, especially in large rural districts. However it is important that the type and tenure of that affordable housing be reflective of local need and not nationally imposed tenures, which are not necessarily appropriate in areas where affordability ratios are low and geared to those in the highest of need, specifically affordable rent, rather than low cost market housing or started homes.

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?

Either. However, in the context of an Infrastructure levy that is set at a threshold that allows for viability of the most challenging sites will mean that very little affordable housing is delivered at all. Equally it is not clear how this would work for a Large Scale Voluntary Transfer Authority. When the question says 'right to purchase at a discounted rate for Local Authorities' does this as cover Registered Providers who operate within these districts?

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

Yes. In the context of an Infrastructure levy that is set at a threshold that allows for viability of the most challenging sites will mean that very little affordable housing is delivered at all.

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?

No. If the system is to work as suggested then the quality of the affordable units should be assured in the same way as the market houses

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

Yes. Given that this is the proposed method for securing all infrastructure requirements associated with new development, the more flexibility given to Local Authorities the better

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

This would be a good method for prioritising affordable housing delivery but given the concerns expressed under 24b this is then likely to be to the detriment of all other necessary infrastructure. Which in marginal viability areas is in most cases already at a greater disadvantage and under developed. This becomes even more acute when considered in a rural marginal viability context.

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?

Yes. The principle of wider and greater engagement by local communities from diverse backgrounds in the planning system is inherently a 'good' thing. The reality of delivering it is entirely different. Arguably the Town & Country planning system is already the most publicly consulted on process delivered by Local Authorities.

The general public mainly get involved in planning when it directly effects them e.g. a development taking place where they live as opposed to commenting on a Local Plan which appears somewhat more abstract and remote to them. This consultation is light on the detail on the practicalities and realities around greater and more meaningful public engagement from more marginalised sections of the community at the local plan stage, and why it is deemed to be positive to significantly curtail this engagement at the Development Management stage.

**Propserous Communities Committee Workplan (as at 12 October 2020)**

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**Purpose:**

The table below provides a summary of reports that are due on the Forward Plan for the remainder of the Civic Year.

**Recommendation:**

1. That members note the contents of this document.

Title	Lead Officer	Purpose of the report
<b>20 OCTOBER 2020</b>		
Consultation Response to Planning for the Future White Paper	Sally Grindrod-Smith, Assistant Director of Planning and Regeneration, Rachael Hughes, Development Contributions Officer	To agree draft consultation response to the Government White Paper
<b>DECEMBER 2020</b>		
Market Rasen Development Fund	Grant White, Enterprising Communities Manager	To approve changes to the established Market Rasen Development Fund in order to support new priorities, change the delivery style and ensure appropriate fund management and governance are in place.
Separate Paper & Card Collection	Robert Gilliot, Waste and Recycling Team Manager	To introduce a separate paper and card collection to improve the quality and quantity of materials collected. Residents receive an additional bin for paper which is collected on a monthly basis.
Environmental Protection Policy	Andy Gray, Housing and Enforcement Manager	policy that outlines approach to EP work areas
Progress and Delivery Report, April - September 2021	Ellen King, Senior	This report presents progress against the Council's key

Page 42

	Performance Officer	performance measures for the first half of 2020-2021 (April - September)
Homes for Independence Strategy	Diane Krochmal, Interim Assistant Director Homes and Communities	to present the countywide Homes for Independence Strategy for approval
Together 24 Programme	Ady Selby, Assistant Director of Commercial and Operational Services	To introduce to Members the new transformational programme, Together 24.
Public Transportation Programme	Grant White, Enterprising Communities Manager	To updated on past progress of transport initiatives supported by WLDC and approve a new delivery plan for our Public Transportation Programme.
Progress and Delivery Report; April - September 2020/21	Ellen King, Senior Performance Officer	This report presents progress against the delivery of the Council's key performance measures for the period April - September 2020/2021.
Proposed Fees and Charges 2021/22 Prosperous Communities	Sue Leversedge, Business Support Team Leader	to proposed fees and charges to take effect from 1 April 2021
S106 precedent wording amendment	Sarah Elvin, Housing Communities Project Officer	Report to recommend an amendment to the current S106 precedent wording in relation to the mortgagee exemption clause.

Page 43

**26 JANUARY 2021**

Prosperous Communities Revenue Base Budgets 2021/22 to 2025/26	Sue Leversedge, Business Support Team Leader	the report sets out details of the Committees draft revenue budget for the period 2021/22 and estimates to 2025/26.
Reintroduction of rents on Gainsborough Market	Ady Selby, Assistant Director of Commercial and Operational Services	Plan on how the free renatl period will end and a strategy for re-introducing charges

**16 MARCH 2021**

Strategic Visitor Economy Strategy	Wendy Osgodby, Senior	Support for the Visitor Economy is embedded within
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Growth Strategy &  
Projects Officer

West Lindsey District Council's Corporate Plan, under the theme 'A prosperous and enterprising district' as follows:

Vision:

'Creating local wealth through the visitor economy'

Objectives:

-Increasing number of visitors / length of stay

-Increasing expenditure by visitors

-Developing leisure, culture and recreational offer

-Increasing the quality and number of businesses / jobs in the sector

Therefore, it is clear that support for developing our Visitor Economy sits at the centre of our strategy for the future of the district.