

White paper: Planning for the Future

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Closing date 29 October 2020

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

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

[Yes / No]

2(a). If no, why not?

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

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future? [Social media / Online news / Newspaper / By post / Other – please specify]

4. What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

Building homes that local people can afford.

Protecting the countryside

Biodiversity and action on climate change

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

[Yes / No / Not sure. Please provide supporting statement.]

No

The new proposals will not simplify the process.

The division of the country into three planning areas, namely Growth areas, Renewal areas and Protected areas would be disastrous. It would be very time consuming, very expensive and would destroy local input into planning decisions.

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

[Yes / No / Not sure. Please provide supporting statement.]

No

The proposals will be disastrous for community involvement and building homes communities from unsuitable development.

7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact? [Yes / No / Not sure. Please provide supporting statement.]

No There are two issues in the question.

Replacing the legal and policy the current tests should not be replaced.

Environmental impact is a current consideration but the test needs redrafting.

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

Firstly the ‘duty to cooperate’ should not be abolished.

The way to avoid such potential disputes is clearer planning rules. The usual best way to resolve such disputes is a joint working group of those involved.

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]

No.

Standardisation would not work and lead to the granting of planning permission in the wrong place. The current procedure of taking all relevant factors into account and giving them the appropriate weight is the best test.

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]

No

The proposals make lack of affordable housing the main criteria, while the above question just asks whether affordability is an appropriate indicator. If affordability is the main criteria, new housing will be in villages and in the South-East instead of in the most suitable places. If the villages are built up it does not make the new houses affordable to local people. The new houses will be bought up by outsiders.

9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement.]

No.

As it will remove community involvement in the planning process, cost a lot of public money to implement and often grant planning permission in the wrong place. It will also encourage substandard housing to be built.

9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]

No

as it will also remove community involvement in the planning process, cost a lot of public money to implement and will often grant planning permission in the wrong place. It will also encourage substandard housing to be built.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement.]

No,

as the proposal is to explore this option with virtually no detail of how the system would work, no case can have been made out.

10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]

No The question should be 'Do you think the proposals will make decision making faster and more certain?'

The proposals would:

Make planning slower - because permission under the scheme cannot be granted until the relevant area has been zoned.

More expensive as that exercise will be very costly.

Less certain as the issue will be about which zone a planning site is in not as now, the suitability of the site taking all the relevant into account.

11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

No

The proposals indicate that local plans will be just web-based. This means that the most vulnerable in society (the elderly and poor), who often do not have a computer and/or computer skills will be deprived of being involved in planning decisions. These people need to have a non-digital system running alongside a more digital process.

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

No

Because of lack of resources, local authorities cannot provide the planning services a local community requires. However, ideally the procedure should not take longer than 18 months.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]

Yes

They are an important way involving a community in local decisions and should not be downgraded as suggested in the new proposals.

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?

By providing assistance to the drafters of such reports (which currently happens). However design concepts should be primarily in the local plans and in some areas the AONB or National Park guides.

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support? [Yes / No / Not sure. Please provide supporting statement.]

The White paper indicates that this is primarily about design. There should be the same emphasis on good design at all sites whether large or small. In an ANOB design should be prioritised and rigorously applied in all developments.

15. What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]

Improving due to an improved National Planning Policy Framework issued in 2019 and a more robust attitude by our District Council and the Planning Inspectors. This is all threatened by the new 'simpler' planning proposals.

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

People want houses they can afford and in many rural areas the sites will be car based. More green and open spaces is welcome.

17. Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement.] 3.9.

Yes but the design guides must not be in conflict with each other.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making? [Yes / No / Not sure. Please provide supporting statement.]

As you are only saying you explore the creation of such a body with no detail the question should be asked after you have a specific proposal. Until then each local authority should continue to arrange the tasks

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes / No / Not sure. Please provide supporting statement.]

Yes, in principle this should be supported but many design decisions are best made locally as local people will understand the local design principles best.

20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

No. The proposals would remove local involvement with individual schemes and hand more design issues to the developer whose dominant interest would be profit not good design.

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]

Many factors need to be considered. The most important is perhaps homes that local people can afford. Homes under the government affordable scheme are generally 80% of market value which in our district local people cannot afford. Social housing is what is required. This means housing association homes. Good design is equally important.

22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold? [Yes / No / Not sure. Please provide supporting statement.]

No

This will reduce the number of homes for local people at prices they can afford, increase the profits for developers, reduce the income for local authorities and lower planning standards.

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

Parts will need to be set by central government and parts need to be set by local authorities.

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

More value would be welcome but there are problems if the rates are not set correctly.

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement.]

No they should use their reserves and replenish the reserves when the money is paid. Excessive borrowing by local authorities causes problems.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]

This is not a neutral question as the question posed assumes the reformed Infrastructure is known. With the limited information available the answer is Yes.

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]

Yes. However the proposals will drastically reduce the amount of affordable housing built.

24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes / No / Not sure. Please provide supporting statement.]

No it should be a percentage requirement of individual schemes.

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]

No. The in-delivery approach is deeply flawed. If the rules are properly drafted there would be no overpayment risk.

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?

The set down percent of houses that have to be affordable should be continued. The in-kind scheme will just help developers to increase their profits by reducing the number of affordable homes in their schemes.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

No it should remain targeted at local authority housing provision.

25(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

The question does not arise as the answer to the last one is No.

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?

Disadvantaged people will have fewer opportunities to live in proper housing. These people are often in section 149 groups.