

White Paper : Planning for the Future – RESPONSES

The Ministry of Housing, Communities and Local Government have issued the above consultation, which is open to the public until 29 October 2020. The link to the Government paper is shown below and responses can be posted online or emailed directly to planningforthefuture@communities.gov.uk

This document is the suggested response to each question posed.

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

Thorough, variable (by area) and necessary.

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

Yes.

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?

Choices - Social media / online news ✓ / newspaper ✓ / by post / other – there is a great need to introduce a filter so that comments can only be made once available documentation has been reviewed. We have several areas of deprivation and a large proportion of elderly persons who cannot always access information online and it would be discriminatory to put everything online, we should all have full access to information.

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

Choices – Building homes for young people / building homes for the homeless / protection of green spaces / Environment, biodiversity and action on climate change / increasing affordability of housing / design of new homes and spaces / supporting the high street / supporting local economy / more or better local infrastructure / protection of existing heritage buildings / other – Every one of these choices are essential for the local area in the future. There is no mention of leisure facilities, which the High Street is fast becoming part of as its general use changes to a social hub for the community. This omission is deeply concerning.

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

No – as it appears to wholly remove local power and influence.

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

There is a mismatch between national development management policy setting and localism. The most local level in the planning process, Towns and Parish Councils, is not mentioned at any point. A greater focus on design quality is imperative but the text seems to contradict itself, stating this would happen at a local level by having a 'Chief Officer for Design' yet a new body is to be set up to support the delivery of design codes nationally.

With national policies and a local plan only setting out site or area specific parameters and opportunities, we cannot see how the detail needed to retain local character will be provided.

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?

There is a need to increase ability to make timely decisions but we fail to see how a 'faster and simpler' system will be able to protect and enhance unique ecosystems. It is imperative that environmental impact is adequately scrutinised locally, and failure to do so will impact this generation and future ones. Accurate identification of S.I.N.C. S.S.S.I. and other designated sites can only be done at local level, to make this national would create mistakes that could not be reversed. Speed of business means very little if we continue to systemically erode our environments; we cannot eat money. This is an opportunity to truly put the environment first, rather than using empty words to grab a headline.

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

With the need for a similar duty, abolition is unnecessary as appears only for the sake of change.

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

Yes, with a need to adopt minimum space standards such as within the Technical Housing Standards issued by the DCLG in 2015. We must ensure that everyone, regardless of tenure, has adequate space to live and thrive to safeguard wellbeing and future generations. This should also include minimum requirements for natural light to those dwellings, associated amenity space within the boundary and additional dedicated indoor space to allow more likely working from home.

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, as quality and affordability must be carefully balanced within the existing urban areas as above, otherwise we could be creating future slums.

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?

Detailed consent needs adequate consideration and there must be an ongoing need to involve statutory consultees, such as Town and Parish Councils and relevant government departments such as Highways. It's this type of consultation that can slow the process down but is absolutely necessary for the right result.

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

No, not at the expense of local relevance.

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

No, as there are adequate vacant homes nationally. The suggestion of a new settlement does not benefit the national population, it just hits a target number and often negatively impacts the existing residents of nearby towns. Housing being targeted under the NSIP is overreach of its purposes, being basic organisational facilities to support society.

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

If they are quality decisions, yes.

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

In the main, yes. However, there is still a strong need particularly locally, to provide the information in paper form and/or at public events. To dismiss this aspect would dismiss a section of society that have an important voice, yet do not/cannot access digital means.

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

This is dependent on the 'sanctions' that are suggested. The process needs to be faster than currently, but if funding to the LPA department is cut for example, there will be an even greater challenge for the Plan to be produced. Any sanction needs to be carefully thought out so that it does not place an additional burden to the process of individual plan making.

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

Yes.

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?

With funding and other support for booths or touch screens, so it is easier to view consultations and gather community responses.

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?

Adding the timescale that a site could be brought forward as it would help focus respondents' comments.

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

There has been quite a mix of sympathetic design which blends easily once built, and others that although apparently respecting design cues, still look bulky and incongruous. It seems easier to have poorer design if the build is stand alone in a site enclosed with trees.

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

Choices – less reliance on cars / more green and open spaces / energy efficiency of new buildings / more trees / other – a general move towards each of these measures in line with the current Local Plan, to include access routes to key facilities and important destinations.

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

Yes, if it is wholly at local level.

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?

No. No new body is needed particularly at a national level when local Planners have the relevant and local experience already. We cannot see how you can centralise this important aspect while retaining and enhancing 'beauty'.

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

Yes, but the final nuances of design must be decided locally to protect and enhance local character and densities.

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

No. Beauty is a very subjective word so this needs to be quantified.

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

Choices – More affordable housing / more or better infrastructure / design of new buildings / more shops or employment space / green space / other – a general move towards each measure as they are 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?

During the origins of C.I.L. it was expected that it would fully supersede Section 106 agreements, so this is not unexpected. It makes sense to standardise the charge and lessen the need for lengthy negotiations.

B) Should the infrastructure levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

Set nationally at an area-specific rate. If the values are set locally there is greater chance of challenge from some of the larger national developers.

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?

It should provide more value.

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

Yes, to increase cash flow for the SME.

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

No, as some changes of use can have fundamental impacts on local infrastructure.

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 provision as at present?

Yes, there should be maintenance of existing levels, if not an improvement.

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?

No preference.

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

Yes, as could be dictated by forces out of the Local Authority control.

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

Yes, see response to question 8A.

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

No. The funds should continue to be directly focussed.

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

Not relevant.

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. Disadvantaged groups, including persons with protected characteristics have the greatest possibility of being affected by 'affordable' but poor-quality housing with minimum space to live. This is an opportunity to protect the vulnerable with a better type of housing, rather than increase the divide. The nature of housing is recognised to have a direct effect on wellbeing, education and job prospects which still impact individuals and society for decades.