

East Meon Parish Council  
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27<sup>th</sup> October 2020

By email to: [planningforthefuture@communities.gov.uk](mailto:planningforthefuture@communities.gov.uk)

Dear Sir / Madam

### **Consultation Response: White Paper – Planning for the Future**

East Meon Parish Council welcomes this opportunity to comment on the White Paper. We make some overview comments below followed by our answers to the questions posed in the White Paper which are relevant to our parish. We look forward to further consultation on the forthcoming changes to the planning system.

#### **East Meon**

This information is taken from the adopted East Meon Neighbourhood Plan.

The Parish of East Meon is located entirely within the South Downs National Park and, as such, the South Downs National Park Authority (SDNPA) is our LPA. At the last Census, the population of the Parish was 1257 individuals in 507 dwellings. The population has increased by over 12% in the past 10 years, twice as much as in East Hampshire (the relevant local council). In the last 14 years, there have been over 60 new dwellings in the Parish. The Parish has a high proportion of social rented housing (23%) versus an average of 12% in East Hampshire.

#### **East Meon Neighbourhood Development Plan (EMNDP)**

The purpose of this section is to highlight the success and importance of Neighbourhood Planning in the planning process.

The East Meon Neighbourhood Development Plan was adopted by SDNPA in December 2017 after a referendum in which 83.9% of those voting supported the plan, on a turnout of 37%. The NDP allocates sites for development of 17 dwellings versus 15 in the South Downs Local Plan, plus a number of policies covering protection of valued views (essential for a village in a National Park), protection of Green Spaces, Design Policies and Sewerage, Drainage and Surface Water Management (a major problem in the village). Also developed was the East Meon Pattern Book, an assessment of local distinctiveness of the village to support developers and residents produce well designed buildings. East Meon Parish Council and SDNPA worked very closely in the development of the NDP to ensure consistency of policies and to avoid duplication. **The specific policies addressing specific issues in the parish would not be identified in centralised approach to planning.**

A significant amount of local consultation went into the formation of the NDP including open days, presentations and surveys. Events were often attended by around 100 residents. This is supported by the high turn-out in the referendum.

The NDP was underpinned by the Housing Needs Survey and Assessment (a written survey and conversations with local residents) which concluded that the parish needs:

- Small homes for single people and couples
- Small family homes of 2 or 3 bedrooms
- Smaller homes to enable people to downsize, reflecting the large increase in the proportion of people aged 45 – 69 over the last decade.

The need for affordable housing for younger families and the need to free up larger, family homes by providing opportunities for older residents (whose children have left home) to downsize without leaving the village is essential to bring in new blood and to maintain the vitality and viability of the village, especially its school, its community and its economy. **These nuances would not be identified under a centralised planning process, nor one in which local input is limited to digital means only.**

#### **Clarification on the Status of National Parks**

The White Paper provides a number of examples of areas that would be protected, e.g. green belt and conservation areas, but National Parks are not included in this list. **We request that National Parks are explicitly added to the list of protected areas.**

#### **Changing the system so that decision-making is faster and more certain**

According to the Local Government Association, England has nearly 1 million housing units with permission waiting to be built, which may indicate a more pressing problem than just 'fixing' the planning system as indicated in the White Paper.

#### **Impacts on the Environment and Climate Change**

EMPC is deeply concerned that the White Paper has been written without reference to both the climate change emergency (other than a few high-level comments) and the negative impact that human activity is having on biodiversity and does not align with either existing and emerging legislation. The requirement to build homes cannot come at the expense of the climate and the environment; **we would like to see protection of the environment and the climate given much more prominence in the planning process, without compromising the quality of build and the protection of listed buildings.**

Please contact me if you need any clarification of the points made.

Yours faithfully,

Steven Ridgeon

East Meon Parish Council – Chair of Planning Committee

## White Paper: Planning for the Future

### East Meon Parish Council response to relevant questions in the White Paper

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

- Essential
- Democratic
- Abused

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

Yes, we are a Parish Council and are consulted on planning applications in our parish by South Downs National Park Authority. The Parish Council Planning Committee visits all sites on which there are planning applications and holds meetings in public to discuss those that are contentious.

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?*

We welcome the objective to encourage community engagement with the planning system. Our experience is that using a variety of methods (digital and 'paper-based') maximises the number of people engaging in a consultation. It should be remembered that internet coverage is very poor in rural areas, including parts of East Meon, so the risk is that a digital-only approach could actually exclude some people.

Key for good engagement is that people have access to information that is clear, meaningful, timely and which shows the impact on them and their environment. EMPC demonstrated this with our NDP.

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

There are 4 priorities in the East Meon NDP:

- **Protect the Natural Landscape:** The natural beauty of the countryside surrounding the village of East Meon is unparalleled in East Hampshire and enjoyed by residents as well as the area's many visitors. The Neighbourhood Development Plan seeks to ensure that any new development is in harmony with the rural environment, protecting views of the village when approached by road or on foot and views from the village of the surrounding downland.
- **Maintain a thriving, balanced community:** East Meon is proud of its strong community spirit and inclusive character. The Neighbourhood Development Plan aims to maintain the vitality of the village by promoting smaller and more affordable homes for young people and young families. Village cohesion requires people with a strong local connection to be the priority for affordable housing. Encouraging a sense of belonging means no elderly residents should be required to move away to find properties suitable for retirement. The Neighbourhood Development Plan addresses the need for suitable homes for down-sizers.
- **Retain and enhance the village's existing services and facilities:** Residents value East Meon's services, facilities and green spaces. These assets need to be protected, supported and enhanced to provide an outstanding quality of life for current and future generations of residents.

- **Protect the village’s built heritage:** East Meon has grown organically along the banks of the River Meon for over a thousand years with a strong grid pattern of development that has survived since Norman times. The choice of new sites reflects the ‘grid and cluster’ pattern of the village to ensure the basic built form of the village is not lost through inappropriate additions. The Neighbourhood Development Plan seeks to ensure that future building responds to the village's unique character with sympathetic design with design policies that reflect the locally distinctive character.

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

No. While we agree that Local Plans could be simplified, the solution is not to provide a rigid plan process and structure which results in poorly informed decisions on development which have long term implications. Certainly, a ‘one-size-fits-all’ approach would miss the nuances and details specific to localities which are essential for a successful Local Plan. Speed of plan development should not compromise the quality and local knowledge and understanding which makes the delivery the plan more successful. Where consultation and engagement are required, it should be meaningful and timely, with local people have the right amount of information to be able to give an input. It seems to us that the proposed timeline is too rigid and does not provide sufficient time to consider constraints particularly in stage 2 of the process.

The White Paper provides a number of examples of areas that would be protected, e.g. green belt and conservation areas, but National Parks are not included in this list. **We request that National Parks are explicitly added to the list of protected areas**

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. The introduction of standard national policies would certainly simplify the planning system, but we do not agree with standardisation which results in the loss of locally specific policies - for example, the policy in our NDP (which arose from local consultation) which limits the size of new dwellings in East Meon (to support new families and downsizers); and the Dark Night Skies policy in the South Downs Local Plan, which is highly supported by the local community.

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

In our experience, the current Duty to Cooperate process is patchy at best. We would like to see a far stronger requirement for cross-boundary issues to be addressed at the local plan development stage, with plans not being approved unless the issues identified can be shown to have been resolved.

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

No. It is difficult to imagine how such a centralised system would have sufficient local or regional knowledge to understand the constraints that restrict growth or indeed the

opportunities that drive it. The constraints of the South Downs National Park are unique to the Park – for example, the protection of the landscape and ecology for current and future generations – and also varies within regions of the Park, for example within urban and rural areas. The constraints most certainly could not be fully understood within a centralised system.

*(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. These indicators look into the rear-view mirror, are blunt tools and do not encourage an innovative approach to development. For example, affordability in a rural area may certainly not have the same causes as affordability in a town or city. Planning approaches looking at future business growth in a particular area (in, for example, tech industries) may be a far better predictor of the quantity of development required. Likewise, changes to High Streets may impact the jobs within an urban area, which in turn could impact the number of houses required.

Changes to the planning system should also focus on how better and faster to utilise existing buildings to add to the housing stock and minimise building on green land. For example:

- How can the planning system drive reduction in the 635k English houses which lie empty at any one time, 216k for more than 6 months?
- How can the planning system be used to take advantage of the COVID-accelerated trend of declining retail space demand and greater working from home activity, opening-up the potential for unwanted commercial premises to be repurposed?
- How can the planning system support better use of the existing housing stock, for example limiting conversion of smaller homes into larger ones and also discouraging second-home ownership?

**The point about urban areas being more able to absorb development due to existing infrastructure makes sense.**

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, unless there is significant local involvement and engagement, with enough time and information to make this relevant (not a tick-box exercise) during the allocation of zones. It is not enough to say (as in paragraph 2.36), ‘We will consider the most effective means for neighbours and other interested parties to address any issues of concern where, under this system, the principle of development has been established leaving only detailed matters to be resolved.’

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

For Protected areas, we agree with the position that development proposals would still come forward through planning applications.

As above, for Renewal areas, it is not acceptable for local involvement to be limited to (paragraph 2.36), ‘We will consider the most effective means for neighbours and other interested parties to address any issues of concern where, under this system, the principle of development has been established leaving only detailed matters to be resolved.’

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

No. Our view is that this section of the White Paper is overly weighted toward the interests of developers and landowners and gives scant regard to the needs of Local Planning Authorities or the communities they serve. **There is no evidence to suggest that, in a well-managed system, involving the local community slows down the process.**

Whilst in principle we would agree with reforms that bring about greater efficiency and clarity in decision-making, we are concerned, that successful digitisation will take significantly longer to achieve than is assumed and its role in speeding up housing delivery is vastly over-emphasised.

East Meon Parish Council welcomes the introduction of standard national policies, which provide a real opportunity to simplify the planning system. However, we are concerned by any resultant loss of more innovative and locally specific policies, e.g. our NDP policy to limit the size of homes in our village and the South Downs Local Plan policy on Dark Night Skies.

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

Yes, we agree with making local plans more accessible. Our experience is that using a variety of methods maximises the number of people engaging in a consultation. It should be remembered that internet coverage is very poor in rural areas.

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

No. In principle this is a makes sense, but not if it is going to be used as deadline to rush through ill-thought out land categorisation and stifle consultation, input and discussion with local communities. The proposed system will not allow people to engage meaningfully with the process, for example in Stage 3, consultation on submission will be too late to make meaningful responses. As, at this point, the plan will have been submitted it will not be possible for the LPA to amend it in response to comments received.

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

Yes. Based on our own experience, East Meon Parish Council strongly supports Neighbourhood Plans being retained in the reformed planning system. Our Neighbourhood Plan and Pattern Book were developed with a significant amount of community involvement are strongly supported by residents, as evidenced by both the numbers turning up at consultation events, the turnout at the referendum and the reference to the NDP in subsequent planning applications.

(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?*

We found that the requirement of the NDP to be in broad conformity with the strategic policies of the SDNP Local Plan enabled us to find the right balance between the different levels of plans. We think that NDPs should be allowed to allocate and indeed zone within the parameters set by the local plan and set specific policies. If NDPs were simply to become design codes, the knowledge and experience of the qualifying bodies, who have built up considerable expertise in planning for their neighbourhoods, would be lost. Through

consultation and engagement, we believe that our NDP and Pattern Book reflect community preferences about design.

We would support the use of digital tools, except where it might exclude some members of the community due to poor internet access.

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. Delays in build outs is the single biggest issue in the current shortage of housing. Further measures to discourage delays should include refusal to grant further planning permission in an area to developers who have already 'land banked' in that locality and should not be granted permission and should be charged a 'vacant land tax' on all new homes that are granted detailed planning permission. A tax is not unreasonable, as the land value rises as soon as permission is granted.

**According to the Local Government Association, England has nearly 1 million housing units with permission waiting to be built, which may indicate a more pressing problem than just 'fixing' the planning system as indicated in the White Paper.**

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

Mostly, it has been reasonably well designed. We have had concerns about the design of dwellings 'squeezed' into gardens, where the design has, by necessity due to the limited space, not enhanced the surrounding locality.

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

Sustainability is a holistic concept and it should not be a case of identifying one priority over another. The climate and biodiversity crises are of equal concern, and it is extremely worrying that neither of them is mentioned in this consultation.

With regard to the priorities in East Meon, we identify the following:

- Adequate, off-street parking and minimising car use. East Meon is a small village whose roads are not designed for the number of cars using them. There is little alternative to car use as public transport to and from the village is almost non-existent. We push for electric car charging infrastructure on larger developments
- Protection of biodiversity through ensuring developments allow for wildlife corridors, tree planting etc
- Maintaining a thriving and balanced community through limiting the size of new houses to encourage new, young families to enter the village and which allow older people to downsize without leaving and working with SDNPA to ensure developments include affordable housing.

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

Not sure. We already have our neighbourhood Plan and Pattern Book, plus good design support from SDNPA. However, good practice in small developments and extensions is not

always followed by the LPA. If the National Design Code supports specific local design variations (for example, to recognise the local landscape), we would be supportive.

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

Not sure. It depends on the how the 'pre-established principles of what good design looks like (informed by community preferences)' are implemented. Good design is appropriate to local context and therefore not suited to a one size fits all for the purpose of fast-tracking. It is not clear at what level communities are able to express their preferences – parishes or areas within or.....?

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

- Housing that meets local needs (family size, age and affordability)
- Effective sewerage and drainage (East Meon has an inadequate sewerage system, designed when the village was much smaller)
- Effective surface water management and run off mitigation
- Adequate off-road parking

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. Section 106, is useful to secure on-site measures and other mitigation measures that cannot be secured via planning conditions.

We disagree with moving payment from commencement to occupation, as this will prevent infrastructure being in place when dwellings are occupied. Also, the White Paper implies that the Infrastructure Levy could be used to improve services or reduce council tax, which runs the risk that it would be spent on general Council budgets rather than providing infrastructure to support growth. Finally, we have concerns about affordable housing, which is already provided at well below the levels of need and should not be reduced further. It is unclear how local priority for affordable housing would be managed within the new system.

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

Locally to reflect the difference land values between localities.

(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?*

More - the existing system does not result in enough funding to deliver the level of infrastructure needed to properly support new development. Given the huge gains conferred on the value of land when planning permission is granted, any Infrastructure Levy should aim to capture more value than the current system.



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

Yes, subject to clear controls.

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

Yes, some changes under permitted development rights are significant.

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 percentage of social housing to be provided should be set at the plan making stage, taking into account local and site-specific factors, LPA policy and in consultation with those involved in delivering development in the locality. The amount of affordable housing to be provided on any specific site should then be non-negotiable.

*(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, provided this affordable housing is genuinely additional to that which would have to be provided in any case.

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

No. The Infrastructure Levy should not be spent on non-infrastructure items e.g. subsidising council tax. It risks separating the benefits of development from the community in which the development has taken place.

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

The amount of affordable housing set in the Local Plan or, if not available, in the application, should be fixed and not be subject to spending on other projects by Local Authorities or to reduce council tax.