

Comments on the Govt White Paper – Planning for the Future (Aug 20)

Returns to;

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When you reply it would be very useful if you confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- your name, **Mark Flewitt**
- your position (if applicable), **Parish Clerk**
- the name of organisation (if applicable). **Longstock Parish Council, Hampshire, SO20 6DP**

Questions;

PILLAR ONE

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

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

[Yes / No]

Yes – as the Parish Council

There is little if any mention of Parish Councils in the Paper. They currently have a role in the planning process speaking on behalf of their parishioners and their voice must continue to be heard, and given proper weight, at the appropriate level. This is democracy.

- 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]

NA

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]

PC Notice Boards / Lamp posts / PC Newsletter / through the Parish Council

Note: Our Borough Council already has a very popular and successful on-line planning portal.

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]

Smaller houses for YOUNG and OLD / protection of existing heritage buildings and areas / protection of green spaces

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

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

Yes to simplified Local Plans – but must be informed by Neighbourhood Plans.

Housing density should be the same as in Neighbourhood Plans.

There are a lot of similarities between the existing Test Valley Borough Council (TVBC) Local Plan and the new proposals. The three new proposed categories of 'Growth', 'Renewal' and 'Protected' are already referred to as 'Strategic Sites', 'Permitted Development' and 'Countryside' (inc. flood plains).

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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.]

Yes – but with scope for local flexibility.

Parish and Borough Councils must have a role in producing the required design guides and codes

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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.]

In principle – Yes, but we feel that further clarification is required before an informed decision can be made.

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

We feel the current arrangements work well

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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 – Local factors/social economic considerations should be taken into account and set the requirement.

Over the last few years, TVBC has consistently delivered (and on occasion over delivered) pre-set housing numbers, and yet under these new proposals they will be expected to deliver even more houses, presumably to fill in for the short fall created by failing councils.

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 – local factors must be taken into account.

Local councils have a much better understanding and working knowledge of an area. The decision should therefore be made by them.

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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.]

If the White Paper is referring to Garden Cities which bring their own infrastructure then yes, as long as the rules are adhered to.

The application of this proposal becomes more controversial if the paper is talking about adding large developments to the outskirts of a settlement which doesn't have its own infrastructure. A robust assessment needs to be made to ensure that unsustainable pressure is not placed on services.

Having a 'one size fits all' approach which isn't sympathetic to the landscape and doesn't take into consideration the needs of the existing and projected communities is reckless. We feel that Local Councils must have input.

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.]

Yes – this appears to maintain current arrangements, but more detail needed

We feel that this is an area where adopted Neighbourhood Development Plans / Neighbourhood Plans (which have been approved via referendum) should provide the lead.

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.]

Yes. The development of new towns with site specific infrastructure and services embedded into the plans from conception is a much more appropriate method of bringing forward housing.

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

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

Yes – providing the software (which doesn't exist at present) works properly

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

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

Yes – but is it achievable? The process must also ensure availability for “non-digital” residents

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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.]

Yes – but is it achievable? Local Plans are underpinned by research and stakeholder engagement. Consultations and decisions must be robust

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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 – Neighbourhood Plans are absolutely vital in the planning process and form the bedrock of the Local Plan

Although not all areas will have them, we strongly believe that the Neighbourhood Plan, having been constructed by and for local people, should be the bedrock on which Local Plans should be formed. In other words, the National Plan should be informed from the bottom up and not written in Whitehall and pushed down. To this end, there should be much more reference throughout the Paper to Neighbourhood Plans.

Neighbourhood Plans should also contain guidance on local Design Codes to assist parishioners to construct their applications.

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?

More uniform standardised criteria and processes for NHPs – facilitate on-line access

PILLAR TWO

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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.]

Yes – financial penalties should be imposed on developers who fail to build and deliver within a reasonable timescales.

The land held back by developers should be addressed more fully in the Paper and show how the Government intends to tackle this significant issue.

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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]

No comment - Due to constraints (flooding / conservation area / heritage assets) new development in our community has primarily been limited to developing existing structures.

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]

Energy efficiency of new and old buildings / preserve the recognisably beautiful, as enunciated in Neighbourhood Plans / and ensure new builds reflect the neighbourhood whilst incorporating Green measures.

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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.]

Yes – via Neighbourhood Plans and local input to set the criteria

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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.]

No - a centralised design body is too far removed. This should be decided on the basis of local opinion.

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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, with regards to environmental design but visual design is more subjective so it is difficult to see how this would be achieved in an acceptable way taking into account local factors

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

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

NO – beauty is subjective (...in the eye of the beholder”)

THERE IS NO QUESTION 21?

PILLAR THREE

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22. 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]

All of the above - 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

In order to create sustainable developments that meet the needs of both new and existing residents all of the infrastructure and services listed are required. To suggest that developments can be successful without affordable housing, infrastructure or green space does not demonstrate an understanding of how to achieve successful sustainable communities.

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23(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.]

Not sure – but the funds should be captured before or during the development. Not after occupation, as this will increase risk of non-collection

23(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]

It should be set locally with suitable flexibility

23(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.]

It should aim to capture at least the same, and if possible more value for local priorities

23(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 comment

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24. 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.]

Yes

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25(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 - we should be looking to achieve at least the same, and if possible more affordable housing, with more properties for rent than at present).

25(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.]

Not sure - but using the Right to Purchase system should ensure affordable housing is built to a reasonable standard

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

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

Not sure

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

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

Not sure - but couldn't Local Authority building inspectors take on this role and be held accountable for their decisions?

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

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

Yes

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

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

Yes

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27. 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?

No

FINAL COMMENT

We are graced to live in a Green and Pleasant land. The White Paper should address this issue in more depth and detail how it intends to retain this state, if it does, as most of the green field space lies outside Green Belts, National Parks and Areas of Outstanding Natural Beauty.

Finally - to quote: "The most important aspect of planning is the voice of the local resident".