

## **DOGMERSFIELD PARISH COUNCIL RESPONSE TO GOVERNMENT PLANNING WHITE PAPER**

**OCTOBER 2020**

We are responding to your consultation on Planning Reforms. We are a Parish Council with a well-regarded, supported and adopted Neighbourhood Plan which was made in 2018 with a greater than 90% local vote in favour. Within the Parish is a conservation area and a historic park and the Plan has detailed specific development principles for both the conservation area and the broader Parish. It also includes policy detailing general design principles for the parish and the conservation area.

Before responding to your questions we would like to comment on some of your assumptions:

### *1.3 Planning decisions are discretionary rather than rules-based;*

The NPPF contains the rules by which planning authorities make their decisions. They are not able to give consent against the NPPF.

### *It simply does not lead to enough homes being built;*

Many planning applications are granted to developers but they are not starting to build the much needed homes. In our district (Hart) enough applications have been granted to meet the 20 year supply of houses but developers hold back on building them as they want the prices to stay high to maximise their profit. Our area is very expensive and even two bedroomed properties sell for over £300,000. Developers should be made to start building on land which has been granted planning permission within a short time scale and in high priced areas they should have to build a higher percentage of affordable market and affordable rental properties.

### *1.13 Modernising day to day operation of the planning system:*

Whilst we agree with the need for modern digital planning services there should still be a requirement that local notices are posted as most residents do not spend their time checking planning portals and some of our parishioners are not as comfortable accessing online portals as they would be viewing traditional physical notices. Local people should also have a voice before new developments are approved.

### *1.16 Strengthen enforcement powers and sanctions:*

This is to be welcomed but should include sanctions on developers who have land banks and who will not build as they do not want supply to increase and prices fall.

## Questions

### Proposal 1

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

Time consuming, under-manned, complex

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

Yes

As a Parish Council we have a planning officer who is a member of the council and all applications are reviewed by the full Council for planning applications in our area

2(a). If no, why not?

N/A

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 are notified by the local Planning Authority.  
For the public we suggest social media and local Newsletters from the Parish Council as well as paper notices.

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 /*

All of the above are important, our top 3 are :

- protection of green spaces and environment
- more or better local infrastructure
- Protection of existing heritage buildings or areas

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

No. The three categories are too simple. Some areas designated as Renewal may be open to more development than would be sustainable and which would materially

alter the whole ambiance of an area. There should be clearly understood specifications determined locally for sub-set categories.

Protected areas should also include areas designated as Rural or of Historic or Special Interest in Neighbourhood Plans and areas designated as Local Gaps in Local Plans.

We do not support the alternative options which would be too broad and not allow sufficient local input into design specifications.

### **Proposal 2**

*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.

It is important that local planning authorities and neighbourhood plans have a say in determining specific development standards as appropriate to their particular areas.

### **Proposal 3**

*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?*

Not relevant to us as a Parish Council – but the definition of “sustainable” must include preservation of green and open spaces and the heritage built environment

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

Not relevant to us as a Parish Council – but should be overseen by an independent third party body giving impartial and objective views without political influence

### **Proposal 4**

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

No.

It is not possible to standardise this as an inner-city area which has affordability constraints and a rural village also with affordability constraints cannot be treated in the same way.

This Parish Council is very concerned about the use of data & AI to drive decision making at regional or national scale. It only works if the source data is good and land classification is not understood in anyway accurately except for locally.

It is not the planning system which is preventing the building of houses, it is the developers not building on land already granted planning permission which they are not developing as they wait to maximise their profits.

*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. There are many other factors which need to be considered such as existing infrastructure and employment opportunities. A small village with expensive houses should not be expected to take a greater share of future development. Areas of the South East are already heavily developed and heavily populated – the idea that flooding these areas with more homes to make them more affordable will only make them more populated and increase the North /South wealth divide, as well as increase the strain on often already inadequate infrastructure.

The alternative option would be preferable.

#### **Proposal 5**

*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. There must be sufficient detail in the outline application for it to be clear what is being proposed.

An area for substantial development may fall under the responsibility of different land managers and be subjected to applications from multiple developers. The approval process must allow time for the overall implications to be understood. A local authority and, more importantly, the planning authority itself may also be a partner in a hybrid regeneration project. In these cases a full, transparent, planning approval process is necessary.

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

No. Renewal areas can be very different in character and applications must be clear both on what is being proposed and the design. As various national design guides will not always be appropriate in different locations.

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

Not if it negates local input to these schemes.

#### **Proposal 6**

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

Yes. However, the digitalisation and software needed should not be prohibitive to individuals, small developers and small local Parish Councils. Also, see our response to proposal 4 – and our deep concerns about the use of national and regional algorithms and data when applied locally.

#### **Proposal 7**

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

Yes, however time should be allowed for updating, training etc.

The user should be able to access maps which are not just those included in the main Local Plan document, with zoom in and search capabilities.

There should also be a mechanism in place to make such plans available off-line if required.

#### **Proposal 8**

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

No. This is not long enough for councils to be able to change the whole planning framework as they will still be carrying out their normal work.

#### **Proposal 9**

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

Yes, most definitely. Neighbourhood Plans are the way that residents are able to have their say on the development of their locality. They are able to get involved, be consulted and feel that they are being listened to. Good Neighbourhood Plans specify design principles to be followed and aid the local planning authority and all adopted Neighbourhood Plans have been through a local referendum. They are the essence of local planning democracy.

*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?*

Money should be granted to help prepare Plans and online training and information could be made available.

#### **Proposal 10**

*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, definitely. Large areas of land with planning consent are held by developers who want to maximize their profits. Sanctions should be considered if they do not develop the land within a stipulated time scale.

## **Pillar Two**

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

Not good. Most of the development of our parish in the last 5 years or so has taken place in our central village conservation area which has a number of listed historic buildings. The style and size of the new buildings do not reflect this important characteristic in any way.

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

We can see no evidence that your proposals make any attempt to provide a sustainable future. They appear to be focused on allowing more house building without local involvement as to whether or not this works. We consider that sustainability needs to focus on the maintenance of our green and open spaces, trees, hedgerows and views. Maintaining our heritage environment and preserving it for the future is key. Help with more energy efficient buildings and efficient local infrastructure (eg. Roads and public transport). Cars are essential in our Parish as there is no public transport available, no local shops and the narrow roads quickly become blocked at times of high road usage.

## **Proposal 11**

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

Yes, if they have been formulated locally with community involvement to understand the character of each area.

## **Proposal 12**

*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. A new body nationally would be unhelpful if it replaced all other regional bodies. – A National lead body with each authority having a lead officer for design and place-making would be useful.

## **Proposal 13**

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

Carried out at a National level is not seen as helpful nor democratic.

#### **Proposal 14**

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

It depends on the definition of 'beauty'. Yes, if the definition is developed and agreed locally and is appropriate to the local setting. Also, sufficient support and resourcing needs to be given to local authorities to implement it correctly.

#### **Pillar Three**

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

Maintenance of the rural and historic nature of our Parish. More and better infrastructure. Maintenance of the clear separation from the larger built up areas.

#### **Proposal 19**

*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, however developers should have to start to pay a charge as soon as planning consent is granted, with the amount increasing if there is a delay in building to encourage development to take place.

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

Locally as different parts of the country have different needs.

*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?*

More value as there is a great need for affordable housing and investment in local communities.

Areas of substantial development will need higher levies to provide adequate infrastructure to support a, sometimes significant, rise in population.

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

As long as it is clearly affordable by the local authority and subject to local referenda.

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

Commented [MOU1]: Actually I personally don't agree that they should

Yes, if an office block becomes residential apartments then a Levy should be paid to support infrastructure demands due to the increase in population.

### **Proposal 21**

*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.

*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?*

No, affordable housing should be secured as well as the Infrastructure Levy as both are necessary.

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

No comment

*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?*

No comment

### **Proposal 22**

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

Yes, however the neighbourhoods where the development is taking place should be able to say what is needed in their area through consultation with residents. Parish Councils should be statutory consultees on local Infrastructure Delivery Plans.

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

No.

### **Equality Impacts**

*27. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics.*

In a rural small Parish such as ours the absence of any public transport and local shops makes life very difficult for those with mobility issues.