

Responses to white paper consultation - Antrobus Parish Council

The topics the Questions address are:

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| 5. Local Plans simplified | 16. sustainability |
| 6. streamlining | 17. new design guides and codes |
| 7. new test of sustainable development | 18. new body to support design coding |
| 8. housing requirements | 19. Homes England |
| 9. growth, renewal and protection zones | 20. implement a fast-track for beauty |
| 10. decision making faster and more certain | 21. your priority for development |
| 11. web-based plans (with maps) | 22. new infrastructure levy to replace s106 |
| 12. 30 month statutory timescale | 23. scope of levy should include change of use |
| 13. neighbourhood plans | 24. same amount of affordable housing (AH) |
| 14. emphasis on the build out of developments | 25. how LPAs spend the levy |
| 15. How has recent design been? | 26. protected characteristics (Equality Act) |

Responses:

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

Protection against poor quality, indiscriminate and unplanned development.

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

Yes, we are a statutory consultee (Parish Council)

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?*

Parish Council must be retained as a statutory consultee at all stages. We can play an vital role in communicating planning developments to residents.

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

1. Maintaining the character and life of the community
2. Protection/improvement of the environment;
3. Provision of infrastructure (transport, schools) and affordable homes

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

Yes, a simplified process would speed up the system. Provided the Parish Council will be retained as a statutory consultee at all stages. By being obliged to inform it of plans, the locality has the opportunity to respond. The process must not lack a democratic voice. We can also play an vital role in communicating planning developments to residents.

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

In principle a simplified process would speed up the system. There is a lot of duplication on reports etc as each one has to be done by each applicant.

The WP refers to concentrating engagement at the start of the process. This is difficult because engagement is more easily achieved when there are detailed designs and plans available. In the proposed process commentators have to anticipate the form of development and its impacts and assess them. As a result public involvement would be more difficult and lost at most of the Development Management functions. This will risk further alienating planning decisions from communities and eroding the democratic position of elected members.

Antrobus Parish Council considers its role as a statutory consultee important and should be preserved.

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?

No. The retention of legal challenge must always be present in Statute otherwise there is no check on the Executive being those who govern us. The retention of legal challenge is essential.

Whilst retaining legal challenge, a simplified process would speed up the system. There is a lot of duplication on reports etc as each one has to be done by each applicant

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

The duty to co-operate should be retained. Otherwise localities near to council borders would lose out.

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

It is right to have a universal methodology, but it should have a range of factors influencing it. The need for new development should however not be simply based on capacity but on the actual needs of an area to serve the existing and expected population, such as: ecology and design, transport, schools, health provision, open space, landscape, Affordable Homes, affordability, climate change and environmental protection.

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 comment

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 in principle, provided a holistic approach is taken and basic services (drains, transport, schooling, medical) are built into the infrastructure e.g. to avoid dormitory areas.

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

Yes, provided we see the Parish Council involved through statutory consultee in commenting on the designs in protected areas so that local material sensitivities are taken into account.

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

No. We do not want anything to bypass local planning processes

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

Yes

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

Yes, provided the LPA is obliged to keep the Local Plan up to date. New methods that make Local Plans more accessible are welcome.

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

This timescale is too short for the current system but as a result the Local Plan is never up to date. A simpler speedier system could result in Local Plans that are more up to date.

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

Yes. It allows localities to participate.

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?

Unsure

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?

This refers to developments where the full number of units are not completed. This is a complex issue and the influencing forces come from the market.

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

In general, they have been very successful. Occasionally it comes down to taste and that raises the question of whether or not the LPA should be responsible for taste. In the absence of codes you get arbitrary opinions or no control.

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 buildings & Less reliance on cars

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

In the absence of codes you get arbitrary opinions or no control. However those codes must allow for local character and the ability of communities to identify and protect what is important to them. Too standard a product would lead to the detriment of local distinctiveness and character.

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

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

No. We are opposed to Homes England being involved as it has conflicting interests.

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

No. Everyone should be on a reasonable path of delivery. Not get it quick if you follow the pattern book.

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]

More or better infrastructure (such as transport, schools, health provision)

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?

The Levy approach makes it clear that it's a tax. We support its introduction provided the s106 is retained, limited to non-financial considerations such as drainage or affordable housing tenure.

Section 106 agreements, as part of Planning legislation, secure affordable housing in perpetuity by legally binding the land, and can give local people priority in taking an affordable dwelling. If section 106 agreements are abolished entirely, then these benefits will be lost for the local community. This facility must be retained.

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

A levy should be set according to a table of charges rather than by negotiation.

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?

Not sure, whatever is collected the development needs to be able to proceed and the necessary infrastructure delivered. Any requirement for Affordable Homes must be supported somehow and provided at least the present level of delivery (although this lags well behind the need).

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

Not sure

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

A levy could apply to any development in principle. Why shouldn't someone converting an office into houses pay the same levy as someone building the same houses from scratch?

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. In some situations, a payment is made in return for not building AH on a site. This is only acceptable if there is an obligation for the funds to be ring-fenced for AH building elsewhere within a limited time period.

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affordable dwelling. If section 106 agreements are abolished entirely, then these benefits will be lost for the local community. This facility must be retained.

Q24 really 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. In some situations, a payment is made in return for not building AH on a site. This is only acceptable if there is an obligation for the funds to be ring-fenced for AH building elsewhere within a limited time period.

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

No comment

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?

No comment

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

Yes

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

Yes. In some situations, a payment is made in return for not building AH on a site. This is only acceptable if there is an obligation for the funds to be ring-fenced for AH building elsewhere within a limited time period.

Ensuring sufficient delivery to meet need is already challenging without adding further pressure to negotiate away affordable housing in favour of other issues.

Approved 19 Oct 2020
end