



White Paper: Planning for the Future

The answers and comments to the stated questions are those prepared by Withington Group Parish Council.

Pillar One – Planning for development

Questions

1. What three words do you associate most with the planning system in England?
2. Do you get involved with planning decisions in your local area?

[Yes / No]

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]

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]

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]

Answers and Comments

1. Complex, slow, inconsistent
2. Yes, as local residents and Members of the Parish Council, but only as a consultee.

3. Plans and planning proposals should be advised by post to directly affected occupiers,
 - There is a whole generation that are not computer literate, social media and
 - posted notices, along with leaflets to neighbours at same time and by e-mail – where occupiers have registered to be notified of any application in locality

4. a. Building homes which are for outright sale yet affordable to local young families, all too often “affordable” is associated with Housing Association based Shared Ownership where the cost of the mortgage on the “owned” element” when added to the rent on the balance is more than a straight mortgage, the controlling element being the level of deposit the family has available.

- b. Protection of green spaces, and open countryside

- c. The environment, biodiversity, action on climate change and protection of our farms so we are able to produce sufficient food to feed ourselves.

Question

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

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

Answers and Comments

5. Not sure.

Renewal Areas and Areas that are protected are clearly appropriate.

The more contentious point is “Growth Areas”, whilst the principle that once established the provision of automatic outline permission for substantial development in Local Plans makes economic sense great care must be taken in establishing those growth areas, in particular in respect of rural communities. A wise proposal being that any land within a parish – but outside the NDP of that parish should be classified as protected and open countryside

More and more homes are being constructed in areas with few local amenities, increasing reliance on vehicles to access basic health, schooling and shops.

Local plans should further protect farming land providing the ability to feed ourselves, with the opportunity where appropriate to make land dual use, e.g. should solar panels be deployed for the creation of green energy then they should be mounted at a height to enable the land beneath to be grazed.

Question

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.]

Answers and Comments

6. Not sure.

Clearly Neighbourhood plans should place a crucial role in determining potential sites for development but also design, all too recently we have seen “urban design” dwelling

parachuted into rural areas where they are clearly inappropriate and detract from established character, hence a solution along the lines set out in 2.16 should be considered.

National development plans need to have stronger design guides around heat saving, energy usage and water saving devices including grey water harvesting. Stop the message that people do not want this in a new build, installing during construction inevitably means at a lower cost than a retro installation lower cost. The design should further consider dwelling orientation to maximize both solar gain to fenestration and solar panels.

Questions

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.

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

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

Answers and Comments

7a. No. The alternative option set out in Clause 2.22 sounds more viable as this would allow local specifics, e.g. Phosphate levels River Lugg catchment area to be given due weight in the decision-making process.

Developers should be required to build sustainably, not use the excuse of the buyers do not want it.

Specific importance should be attached to the content of Clause 2.20.

7b. Removal of the Duty to Co-operate between neighbouring planning authorities would seem fraught with issues as unfortunately common sense does not always prevail.

Questions

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.]

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.]

Answers and Comments

8a. Yes, the principle appears sound but should be via the Alternative Option set out in Clause 2.28.

On what justification is the national annual housebuilding target of 300,000 new homes based. It needs to have better links to life. Employment without major travel requirements. Leisure accessibility, and environment protection as well as making the houses sustainable.

- 8b. Not sure. Whilst the principal has some logic there should be a distinct differential between urban and rural localities.

Questions

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.]

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.]

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.]

Answers and Comments

- 9a. Yes, subject to the relevant control of what are determined as “Growth Areas” as set out in the answer to Question 5.

Supportable as long as the designs set at national level are strong enough to support the needs of the environment (heating/water usage/Energy)

The question of land banking that is occurring, needs to be resolved before more land is made available and is just easier to build on.

- 9b. Yes

- 9c. Not sure, new settlements without extensive local involvement would appear autocratic by its very nature.

Question

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

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

Answers and Comments

10. Not sure. In principle agree, but the potential automatic grant of permission if there is no timely determination should be avoided.

The Appeal system should remain, but also be extended to 3rd party right of appeal (not just the applicant)- thus being both democratic and transparent. (As in Ireland

Question

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

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

Answers/Comments.

11. Not sure. Whilst the principle is sound for many of the personnel involved it must be remembered that not all people have access to computers, or are computer literate, hence paper copies of all local plans should be clearly displayed at appropriate locations.

Question

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.]

Answers and Comments

12. Yes. Local plans should be considered and prepared in a timely fashion, such that their content is relevant at the time of adoption. With the current "circa 7 years" both the plan and the data upon which it is based is out of date and hence inappropriate.

In Stage 1 - important that any L.A. "call for land" should be preceded by a housing requirement number being established, especially in small villages/parishes

Questions

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

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

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?

Answers and Comments

- 13a. Yes. Local input via Neighbourhood Plans is of vital importance, no one knows the specifics of an area better than those who live in the community, and no one is in a better position to put forward those views than the democratically elected Parish Councillors when responding to Planning Applications.
- 13b. The Neighbourhood Planning process must remain a community-based process through consultation, discussion and public meetings to enable all to have their input, and be heard. The resultant plan once voted to be adopted by the community can then become digitally available, but also paper available at suitable local centres. There MUST be equality of access - some of the most vulnerable members of the community do not have access to digital information.

Question

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.]

Answers and comments

14. Yes. There is clear disruption to the effectiveness of local plans and Neighbourhood Plans where developments which have been granted planning approval do not proceed. The Whitestone Chapel site being a case in point. Some years ago, there was a Development Land Tax to “encourage” Developers to proceed in a timely fashion – perhaps worthy of reconsideration.

Pillar Two – Planning for beautiful and sustainable places

Questions

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]

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]

Answers and Comments

15. Ugly and poorly designed. Whilst clearly the choice of internal layout has moved forward with many people preferring some form of open plan living this is no excuse for bringing standardised designs appropriate for urban situations to rural villages where the external appearances should blend in with the existing character - with homes not crowded together. There needs to be a tighter control on the quality and variety of materials utilised if homes are to be designated “beautiful”

16. More trees – all too often the first thing to go on a new development are the mature trees, which then take many, many years to replace, open green space (with trees) like a village green - in our village developments.

Energy efficiency of new buildings – an important factor in reducing future Carbon Footprint especially where in rural areas reducing private vehicle usage is particularly challenging on a practical day to day level. Too many homes are being developed under the guise of sustainability, and yet these are often in areas where there is no alternative but to use private transport for accessing work, schools and shops.

Question

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.]

Answers and Comments

17. Yes. However, the importance of local community input cannot be ignored. The comments above also appear to focus quite specifically on urban development, it must be recognised that the criteria for rural development are quite different. Development should reflect the locality, and also density should reflect the locality, lower in rural areas than in urban settings.

Question

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.]

Answer and Comment

18. Yes. Providing that the appointed personnel are experienced in the local character and are required to engage with the local community.

Question

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.]

Answers and Comment.

19. Yes. If this principle is not followed then we will see the loss of so much of the character of the different areas within our country.

Question

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

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

Answer and Comments

20. Yes. In principle the proposal seems appropriate although perhaps more relevant to existing urban built up areas rather than rural localities. Increased densities of housing should be avoided. More space is what is needed in the future, cramped living accommodation should be avoided

Pillar Three – Planning for infrastructure and connected places

Question

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]

Answers and Comments

21. Building homes which are for outright sale yet affordable to local young families, all too often “affordable” is associated with Housing Association based Shared Ownership where the cost of the mortgage on the “owned” element when added to the rent on the balance is more than a straight mortgage, the controlling element being the level of deposit the family has available.

Design of new buildings to fit existing community character, and the potential effect on existing residents should be given greater consideration during the application appraisal process.

Maintenance of rural identity

Questions

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?

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

22(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]

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?

[Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

22(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.]

Answers and Comments

22a. Yes. This would provide clarity at an early stage in assessing Development opportunity.

22b. Rate should be set locally to reflect market values which vary significantly across the country.

22c. The infrastructure levy should be targeted to capture the same value overall, any increase has the potential to deter development.

22d. YES as it would allow Local Authorities to get a development going **alongside** any **off-site** infrastructure needs -_by borrowing against the site's Levy due to the L.A., they could then proceed more easily and faster.

(Extreme Case in point - Hereford Ring Road – Housing monies needed to pay for the road but before any development the road is needed!)

Question

23. 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.]

Answers and Comments

23. Yes. Potential enhanced property values should contribute to the Levy, particularly office to residential conversions which are unlikely to provide adequate outside space on site, the Levy could therefore be utilised to support off site open spaces.

Questions

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

24(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.]

24(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.]

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?

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

Answers and Comments

- 24a. Yes. However, that affordable housing should be a mix of affordable outright sale, delivered to market at a percentage reduced cost, in perpetuity, with the same percentage of any future re-sale value being returned to the Local Authority upon any resale, hence maintaining the affordable nature, together with Housing Association supported rented and shared ownership properties.
- 24b. Affordable housing should be supported by the Infrastructure Levy, and not secured as in kind, maintain the Local Authority control over values.
- 24c. Yes. However, if the approach set out in 24b., above, is followed then there should be minimal risk of local authority over payment.
- 24d. Affordable housing should be required to meet the same local design criteria as for mainstream open market sale homes.

Question

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

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

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

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

Answers and Comments

25. No. All too frequently development provided monies are seen to disappear into a "central" pot. A minimum of 50% of the Levy should be spent within the parish within which the development occurs, with the exception of monies spent on education and healthcare where the monies spent may be outside the parish but upon projects which directly benefit the parish.

25a. No. Particularly in rural areas it is not always practical to provide affordable homes where amenities – shops, schools, healthcare – are not easily accessible and people can become trapped due to low levels of public transport viability/accessibility.

EQUALITIES IMPACT

Question

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?

Answers and Comments

26. All parts of "Planning for the Future" should be in compliance with section 149 of the Equality Act 2010