

## White Paper: Planning for the Future.

### Walberton Parish Council's Response to the Questions set in the White Paper. Please note each question is direct from the consultation followed by WPC response.

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

- ◆ Essential
- ◆ Evidence-based
- ◆ Plan-led

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

Yes, we are the local Parish Council with an active planning committee and made Neighbourhood Plan that is currently under review at the Reg 15 stage

2. (a). If no, why not?

Not applicable

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?

The Council welcomes the aspiration to move democracy forward in the planning system and introduce modern digital planning services. Our experience is that the Neighbourhood Planning process has engaged our community.

The five stages of local plan preparation set out in the White Paper do need further thought. For example, how can people engage meaningfully in stage 1 of the process before there is anything tangible to comment on, and how will comments submitted in stage 3 of the process help shape the plan when it has already been submitted for examination?

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

- ◆ Provide limited small developments to meet the local needs, preferably within the BUAB or on Brownfield sites
- ◆ Protecting this rural village setting, maintaining strategic gaps to other local villages.
- ◆ Homes to allow older residents to downsize locally, preferably in bungalows.

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

We agree that it takes too long to adopt a local plan. The five stages of local plan preparation set out in the White Paper do need further thought as set out in our answer to question 3.

We are concerned that the proposed timeline is too rigid and does not provide sufficient time to consider constraints particularly in stage 2 of the process.

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

The Council welcomes the introduction of standard national policies, which provide a real opportunity to simplify the planning system. However, we are concerned by the loss of our more innovative and locally specific policies that are in our Neighbourhood Plan that resonate with our residents.

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?

We await further detail on the new consolidated sustainable development test. Although sustainable development is a much-used term, it is open to multiple interpretations. It is essential that the new system uses the internationally accepted Brundtland definition namely: ‘Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.’

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

The Duty to Cooperate has failed to deliver on cross boundary strategic issues. Bringing back a higher tier of plan making, either through regional or county plans, would make local plan preparation quicker and more efficient.

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

We agree that a standard method would help speed up Local Plan preparation and examinations. We understand and agree that it does currently take too long to calculate a local plan housing requirement. 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. Considerable thought should be given as to how information on constraints and opportunities is gathered and used. We think it would only be possible to use a standard methodology for renewal and growth areas but not for protected areas such as rural villages like our parish.

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, we think that both indicators are overly simplistic and are not positive or pro-active planning tools. In particular, the level of affordability is a blunt tool. This is because increasing the quantity of development in the least affordable areas does not resolve affordability. Instead what needs to happen is an increase in the supply of affordable homes. We do not agree that the extent of the urban area is an appropriate indicator as this would simply perpetuate existing development patterns and miss opportunities to redistribute / rebalance to other areas. Also, it raises the question of how, using the extent of the existing urban area as an indicator, would new settlements be allowed to come forward?

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, providing that there is a robust zoning process based on the points raised in the answer to 8(b) above.

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

In regard to protected areas, we welcome the proposal that development proposals would still come forward through planning applications.

In regard to renewal areas, further information is required on the three options

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. THE NSIP regime is well understood, fair and efficient and is geared up to determine such complex applications. In a limited number of cases new settlements will be required to meet the nation's need for housing and the NSIP regime (with appropriate pre-application consultation) is a good way to consider them. The Government should ensure that local people are fully consulted under the new system.

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

In principle the Council agrees that decision making should be faster, but would like to highlight the recent improvements of Local Planning Authorities (LPA) in this respect. We would like to stress the positive role of Development Management (DM) in complex applications and consider it inherently problematic to both digitise DM and create beautiful places.

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 LPAs or the communities they serve.

The proposal to refund the planning application fee if an application is not determined in time is not supported. We consider that this would lead to an increase in LPAs determining applications as they stand and not taking any revisions to in order to meet the deadlines. In reality this is therefore likely to increase the number of refusals.

Giving deemed consent if the deadline is missed is also not supported. This proposal would diminish local democracy.

The Council welcomes the introduction of standard national policies, which provide a real opportunity to simplify the planning system. However, we are concerned by the loss of our more innovative and locally specific policies in our Neighbourhood Plan

We welcome the proposal in the White Paper to strengthen the role of enforcement in the planning system.

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

Yes, we agree with making local plans more accessible.

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

We agree that it currently takes too long to prepare a local plan and consider the Government's intention to reduce preparation time to 30 months to be laudable. However, we think 30 months to be unrealistic and the individual stages need to be given more thought, particularly to allow people to engage meaningfully with the process. The new system does not provide sufficient time to resolve inherent conflicts in the plan making process.

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

Yes, the Council strongly supports neighbourhood plans being retained in the reformed planning system. This engages with our community and is democracy in action.

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?

The consultation is unclear on the future role of NDPs. We have found that the requirement to be in broad conformity with the strategic policies of the local plan provides 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. If NDPs were simply to become design codes it would not play to the strengths of the qualifying bodies, who have built up considerable expertise in planning for their neighbourhoods since NDPs were introduced by the Government in 2011.

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, we agree that there should be a stronger emphasis on the build out of developments. However, very little is set out in the White Paper to address this. We propose enacting the recommendations from the Letwin review into Build Out Rates and taking measures to tackle land banking by developers. Whilst LPAs can, and should, progress local plans and planning applications quickly they do not control any levers when it comes to building out developments and implementing planning permissions. One solution is to charge council tax or some sort of vacant land tax on all new homes that are granted detailed planning permission. The land value rises as soon as permission is granted through the 'national' system so it seems reasonable that some betterment should accrue from that point.

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

We have two medium size developments underway and the council's involvement with the developers and LPA has been inclusive and worthwhile.

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

Whilst sustainability is a wide-ranging concept, at our local level it is about maintaining the identity of rural villages and not allowing infill to create an urban sprawl. Sustainability must also consider sustainability of local services and facilities considered subjectively against the local population.

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

The Council welcomes the emphasis that the White Paper places on good design and the creation of beautiful places. We acknowledge that design guides and codes can increase the quality of places delivered, but do question whether their use allows truly innovative design to come forward. We agree that securing local buy-in is important.

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, to both parts of the question. A national body to raise standards, awareness and outcomes and to support all involved would be welcomed. For each authority to have a chief officer for design and place making would also be welcomed as helping to raise the profile and importance of planning.

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

Yes, giving a greater emphasis for Homes England to deliver beautiful places is important because Homes England are one of the largest developers in the country. Therefore, this requirement has the potential to positively affect many new homes a year.

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

We welcome the aspiration behind this proposal and generally give the proposal a cautious welcome whilst we await the details. We particularly wish to see the details of widening and changing the nature of permitted development.

Although we can see merit in facilitating the pre-approval of popular and replicable housing designs through permitted development it is difficult to see how this will take account of local context.

We support developing a pilot programme to test the concept.

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

As a collection of rural villages with few local services or amenities our priority is to create local facilities for the use and enjoyment of the residents.

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?

Our main concern is that payment would be moved from commencement to occupation. Although this will aid developer cash flow, it will prevent infrastructure being in place on occupation or shortly afterwards. Secondly, the White Paper states that the Infrastructure Levy could be used to improve services or reduce council tax. This of course runs the risk that it would be spent on general Council budgets rather than providing infrastructure to support growth. Finally, we have concerns that affordable housing will be reduced.

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

Rates should be set locally or regionally to take into account of local land values and in order to try and help address the imbalance in growth and economic development between regions.

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?

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. Capturing increased value for public benefit should also help increase the acceptability of development in areas.

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

Yes, subject to defined guidelines.

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

Yes, as such changes of use may involve significant floorspace. Where the new use is residential significant demand on local infrastructure is likely to result.

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, as the levels of affordable housing provided are already well below the levels of need and should not be reduced further. Providing on site affordable housing is crucial to ensure we do not create new areas segregated by wealth.

Parish and Town Councils should be able to add a "local connection" to their Neighbourhood Plans.

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?

We would prefer the 'right to purchase' at discounted rates for local authorities.

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

Yes, but they should be limited to the 2019 changes already made to the CIL Regulations. We are concerned that the White Paper says that the Levy could be used to 'improve services or reduce council tax'. There is a real danger the levy will not be spent on delivering the infrastructure needed but supporting general Council budgets.

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

Yes, it is hard enough to deliver affordable housing without adding the competition for CIL monies from other infrastructure requirements such as education provision.

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?

The proposal to greatly increase digitisation in planning could have an adverse impact on the older members of society who would like to engage with the planning system but may not be fully computer literate.