

## Leavenheath Parish Council White Paper Planning for the future Consultation response.

1. The Government has made clear it wants a planning system that is simpler, clearer and quicker to navigate, delivering results in weeks and months rather than years/decades. Planning decisions are currently taken on a case by case basis rather than rules-based is true to a degree but all decisions are taken within a broad framework allowing local communities to determine, which is best for them.
2. We believe it is essential that the planning system remains locally-led as opposed to algorithms overseen by central Government. It is local communities that needs the power to say where new developments should be and of a high standard. Any loss of local control over developments would be a real concern.
3. It is suggested the planning system is cumbersome and it takes time to deliver results, but we do not agree with this. Nine in 10 applications are approved with more than a million homes given planning permission over the last decade yet to be built [CPRE The Countryside Charity]. This is completely unacceptable. The Government should be focusing on ensuring these outstanding permissions are completed before seeking to fundamentally change the planning system. The Government has inlight of this essentially misdiagnosed the problem. We are concerned that the changes will provide developers the freedom to ride roughshod over local areas.
4. A key question for the Government to answer is:
  - If there's enough land in the planning system to meet the Government's own housing targets, what will an overhaul of the planning system, with rushed and untested changes, really achieve?
5. In answering the consultation questions, on behalf of Leavenheath Parish we say:

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

Bureaucratic, Cumbersome and Biased.

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

Question 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?

Via Parish Council, Email and Social Media.

Question 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]

Increasing the affordability of housing, protection of green spaces and AONB's, the environment, biodiversity and action on climate change, protection of existing heritage buildings.

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

No. This is too simplistic. The local communities are best placed to determine the needs of the local area. The planning framework is relatively straight forward given the NPPF and local plans.

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 to a degree. The timescale for introducing local plans is far too cumbersome, but the streamlining must given local authorities a significant margin of appreciation and not simply be guided by a limited, narrow set of rules determined by central Government

Question 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?

It is important local communities can continue setting policies that meet it's needs of which planning grants need due diligence/consideration. A simple test applicable to all decisions is arguably irrational as it will not sufficiently take into account nuances across England and Wales.

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

This is too broad, but could be possibly met via incentives to co-operate.

Question 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, this proposal is absurd. There is little confidence from the Parish and general wider public in the capability of the Government in setting the criteria. We are concerned it may be set through an algorithm.

Question 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, affordability is not linked to the lack of planning grants, as documented above there are over 1 million grants, yet to be built.

Question 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?

We are concerned with the idea of automatic outline permission as we think local communities should always have the ability to have a say in local planning decisions.

Question 9(b). Do you agree with our proposals above for the consent arrangements for *Renewal* and *Protected* areas? No.

Question 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.

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

Yes, but local communities should not lose their ability to have a clear say. Our experience is that we often face delays from planning applicants due to poorly presented applications that do not contain all the required information to make a properly informed decision.

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

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

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

Yes, we are currently completing a Neighbourhood Plan and we are pleased that once complete they have the same legal weight as the local plan.

Question 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?

Digital tools and design codes can already be included within Neighbourhood plans. It is vital to ensure that neighbourhood plans remain meaningful and are simply not a tick box exercise in saying local communities have been consulted.

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, if properly prepared and in the right geography.

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

We have a range of housing styles within our parish and the key is that new developments are in keeping with the housing styles of the parish. We have low density housing and this is realistically how it should remain to ensure appropriate car parking off road spaces. Suffolk guidance suggests a minimum two off road car parking spaces, increasing by one car per bedroom, given poor public transport in the vicinity.

New developments have been respectful of front garden space and general garden space, this generally is only achievable with low density housing as opposed to overdevelopment of sites.

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

Energy efficiency, Sustainable materials. We do not believe building on arable land is sustainable.

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

Yes, but there still needs to be sufficient scope for locally led input. We clearly need better quality design.

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?

No, but Chief Officers leading design and place-making would be a good option.

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.

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

This is a very odd phrase. Fast-track suggests riding roughshod over the need to provide local communities with adequate time to have input.

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]

Housing in our local community is above the national average in terms of cost. Housing needs to be better affordable to the public across the country and in our community. Any new housing needs sufficient green space.

Question 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, but the fixed proportion should be a decent percentage given the profits to developers.

Question 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]

Locally.

Question 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/more value.

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

No, there is no reasonable reason to require local communities to borrow against the Infrastructure levy. Given the Government wants a fast system there is no reason why developers should not be mandated to pay the infrastructure levy within x amount of days following a grant.

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

No it should be determined by fixed, simple assessments of the effect of the change on the infrastructure.

Question 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?

It should be more.

Question 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?

Developers do what they can to avoid providing afford housing and we believe it should be fixed in law.

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

Question 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? Not sure.

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

Yes provided the money is not diverted to non-local infrastructure.

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?

That is difficult to answer and cannot properly be answered until the Government sets out its response to the consultation and how it intends to move forward. We would say that if the Government restricts the ability of local communities to have a meaningful role in planning then it is likely that it will lead to a poor equality outcome.

26<sup>TH</sup> October 2020  
Leavenheath Parish Council