

PC10-20 | CHANGES TO THE CURRENT PLANNING SYSTEM

Consultation questions and responses

1. Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?

NO. Reason: Already stressed areas and especially rural communities adjacent to urban areas already overburdened with housing developments and NO complementary infrastructure or material benefit would be disproportionately disadvantaged.

2. In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why

YES, 0.5% would be reasonable

3. Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

NO. Providing the meaning of median is its statistical definition and is relevant to housing need in the area and providing the workplace identified is within the parish. It is not unusual for different council department to have different interpretations, including equating median with average. There should therefore be provision to deviate from the use of the proposed mechanism for using work-place salaries as a guide to affordability in certain situations, or else change to residence-based salaries nationally if there is a desire to continue with a single national scheme. The measure needs to take account of the local population and their housing requirements, i.e. greater emphasis on social housing and low cost rent to encourage more to stay in the area.

4. Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

NO. Reason: An adjustment would only be appropriate if handled correctly, but a change over 10 years (i.e. today vs ten years ago as proposed) demands an evaluation of the year-to-year trends because a typical data at either extreme will skew the position and affect the change of affordability. Requirement to factor effect of Covid-19

5. Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

YES

6. Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?

YES

7. Authorities close to publishing their second stage consultation (Regulation 19), which should

be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate?

If not, please explain why. Are there particular circumstances which need to be catered for?

YES

8. The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):

- i) Prioritising the replacement of affordable home ownership tenures and delivering rental tenures in the ratio set out in the local plan policy.
- ii) Negotiation between a local authority and developer.
- iii) Other (please specify)

Yes number ii) Negotiation but to reflect local needs.

9. Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to this First Homes requirement?

YES

10. Are any existing exemptions not required? If not, please set out which exemptions and why.

NO. Reason: a-d of section 64 should remain in place.

11. Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.

NO : However are we catering for an aging population with lower pensions? Does this count as an exemption?

12. Do you agree with the proposed approach to transitional arrangements set out above?

YES

13. Do you agree with the proposed approach to different levels of discount?

NO. Reason: again a-d of section 64 should remain in place

14. Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?

YES, again to meet local housing needs including affordable homes.

15. Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?

NO. Reason: In rural areas proportionality is open to interpretation - the size of the site should be a stated proportion of existing stock, say no more than 7% in any 5 year period to allow rural

communities to adapt and integrate. Need to ensure supportive infrastructure in place.

16. Do you agree that the First Homes exception sites policy should not apply in designated rural areas?

YES. Rural areas should have their own exceptions, to protect farming and food production.

17. Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?

NO. Reason: Should remain at current level

18. What is the appropriate level of small sites threshold? i) Up to 40 homes ii) Up to 50 homes iii) Other (please specify)

This should be 10 to 20 homes max. Reason: SMEs developers are more likely to exploit the threshold advantage among the smaller rural communities where increasing the housing stock always results in significant strain on the community and infrastructure. Resetting this threshold would solely benefit the larger builders in our area, yet would significantly reduce the ability of the local authority to gain contributions for housing schemes.

19. Do you agree with the proposed approach to the site size threshold?

With reservations as these need to be tailored to individual areas as towns and rural areas differ

20. Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?

NO. Reason: This should remain as current to ensure (non SME) speculative developers to muscle in and take advantage.

21. Do you agree with the proposed approach to minimising threshold effects?

NO. Reason: Would need rigorous policing by planning enforcement officers to ensure minimum effect. Therefore keep sites small to avoid need for extra guidance.

22. Do you agree with the Government's proposed approach to setting thresholds in rural areas?

YES. Rural areas need separate consideration at local level

23. Are there any other ways in which the Government can support SEE builders to deliver new homes during the economic recovery period?

Rational: This really need to be Local Builders not larger organization to ensure help to genuine Local SME developers, The SME must be local, i.e. within 20-30 miles of a proposed development site. All SMEs should be pre-qualified by the local planning authority and be members of the Federation of Master Builders. VITAL that any SME must be able to demonstrate financial viability to complete the work including any anillary work such as roads, pavements, paths and landscaping unfinished.

24. Do you agree that the new Permission in Principle should remove the restriction on major development?

NO. Reason: Reason: insufficient information and lack of democratic transparency. Far too presumptive - as it stands, it would lead to abuses of the system and public anger.

25. Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.

YES. significant commercial development should be planned by the community and not imposed at the whim of the developer.

26. Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

NO Reason: Only for brown field sites in urban environments. ALSO, increase the public consultation to minimum 28 days to allow meaningful dialogue.

27. Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.

YES. Reason: Based on a community design code to ensure heights are in keeping with surrounding properties

28. Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:

- i) required to publish a notice in a local newspaper?
- ii) subject to a general requirement to publicise the application or
- iii) both?
- iv) Disagree

YES. iii) Both.

29. Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?

YES

30. What level of flat fee do you consider appropriate, and why?

Because it's a financial win-win situation - substantial savings by the developer from less bureaucracy - the fee should reflect the hugely increased convenience and down-stream cost-savings realised by the developer, therefore the fee should INCREASE, not decrease - suggest £650 per 0.1 hectares.

31. Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.

YES.

32. What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.

Essentially a clear, concise set of rules. This would give clear guidelines to a developer with up-front information on the basics including transport and access, current brown field site conditions and other proposed developments including infrastructure. Local economy, employment and housing needs

33. What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?

Costs - the local planning authority would have to produce an impact assessment of each Permission in Principle in order to maintain the coherence of its own planning policy and infrastructure integrity management plans. This would be an additional burden on overstretched and inadequately staffed planning departments who lack the quality of professional expertise necessary to meet the challenges ahead. Suggestion: if and when a Permission in Principle development comes to full fruition, a levy of, say, 8-10% is applied into the local economy.

34. To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.

From past experience landowners and developers take advantage of the system at present therefore it seems doubtful many will in the future. Our own parish - St Cuthbert (Out) Wells - has suffered enormously in recent years from large out-of-region companies advertising for land in order to gain planning permission. The only land-owners who responded were ones in areas of the parish where development was NOT desired or designated areas for development resulting in large housing estates in the wrong places as a result. Allowing local communities to specify certain areas for PIP could stop this happening. It would allow local house-builders to directly negotiate with the land-owners for a fair price and the house-builder would also save having to pay land speculators higher prices for land, helping to wipe of thousands of pounds off each property built and sold.