

## PC11-20 “PLANNING FOR THE FUTURE”

### Consultation Questions: **St Cuthbert (Out) Parish Council Response**

NALC will be responding to the consultation questions as follows:

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

Responsive, complex, inconsistent.

2. Do you get involved with planning decisions in your local area? [Yes / No]

(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]

Yes, as a Parish Councillor

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]

Local online news, email, Local Authority Portal, open meetings funded by central government.

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]

1. Strengthening the community and local infrastructure. 2. Protecting and enhancing green spaces and natural habitats. 3. Only allowing good quality, well designed homes of the right type, material and size.

5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

Not sure. Provided they ensure local communities continue to be involved in defining their requirements, have their say and are listened to. We cannot allow developers, the PropTech industry or government to ignore our active local communities whilst making huge financial gains, as at present.

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.]

No, clear rules over general policy is an advantage but Local Plans are so much more than identifying land for development, they are about the values communities put on their living environment, open green spaces, protected areas, preserving heritage - these things can only be regulated by local community representatives, the parish councils.

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

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

a) No, the proposed test offers inadequate protections as 'sustainable development' is a catch-all panacea for developers. In rural communities, the necessity for an informed and expert environment impact assessment is crucial to sustained food production and protecting the ecology and biodiversity necessary to that production.

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.]

a) No, there are many good ideas there, but it (and its alternative) fails to address the rapid growth of 'developments for commuters', primarily in rural areas, with typical commutes of an hour or more adding to congestion on already overstressed road systems and 'rat-runs', the harsh impact of commuter traffic on the environment, and the welfare of people's health and well-being. The standard needs to be flexible and sympathetic to the local environment.

- (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.]

b) No, as these 'affordable houses' may be affordable to commuters but not to the locals.

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.]

No, providing there was a Local Plan, for substantial brownfield site development, yes, but for greenfield and 'infill' zones, automatic outline permission would be counter-productive and inevitably lead to low-quality, expensive housing experiences which would lead to extensive reviewing.

- (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.]

No, because the follow on detailed planning permission process is too weak and open to abuse, legal challenge and costly court cases from which local authorities always shy away. In our rural parish, there must be provision to protect farmland, food production and rural economies.

(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.]

No, only reason is that the Nationally Significant Infrastructure Projects proposal is ill-defined. More detail would need to be available and specific to regions.

10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]

Not sure. The best schemes benefit from detailed negotiation. A shortened timescale can result in premature refusal or a mundane solution. Can see the advantages of using digital software but it could lead to “blaming the algorithm” if things go wrong.

11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

Yes, if Plans were properly funded.

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.]

Not sure. Providing that time is only for preparing and proposing the plan. Any involvement by inspectors and extra consultation etc should be in addition to the 30 months.

13. (a) Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]

Yes, providing Neighbourhood Plans will perform a vital role in the new scheme. A “Local” plan that covers a whole county of perhaps 200 to 300 individual communities will never be able to contain design/building codes that can address the needs of every community, therefore this level of detail must be retained at Neighbourhood level.

(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 GIS map-based, populated with the outcomes of on-line local community consultation and involvement.

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.]

Yes, we need to ensure that developers complete all aspects of the build including roads, footpaths, planting to an agreed high standard, if not penalty clauses to be applied.

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]

Shoddy, redbrick estates of expensive houses, lacking schools, surgeries and play areas, inadequate living and outside spaces, foisted into communities and sold to outsiders.

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 and orientation of new buildings. Provision of walking and cycling networks. Rich biodiversity and wildlife corridors. Tree planting and green spaces. Proximity to employment, schools, health provision and local facilities. Provision of local employment to avoid commuting. Clean air and water.

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.]

Yes, providing they meet local area needs and not just standardised to a national level.

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.]

A guarded yes - guarded because a single chief officer per county cannot possibly represent the diverse requirements of hundreds of local communities. It would require locally familiar officers as well, ensuring adaptability to local need under any local authority system and that design advice would be bottom-up.

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.]

Yes, if they are capable of understanding what design means, which doesn't seem to be their priority at this time, and following the 'Build Better, Build Beautiful' report.

20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

No, beauty is in the eye of the beholder - what a developer or architect may think is beauty, the community living in the area may think is ugly and it should complement the local context. England is littered with 'beautiful' monstrosities. The local community (by which is meant the real people, not a unitary's idea of what is local) should have a veto on what is 'beauty'. A 'fast track can lead to standardisation and monotony: good design takes time and cannot be "fast tracked".

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]

Links to new and existing facilities and infrastructure (schools/health/green spaces). Better design of new buildings and the spaces between them. Provision of better public transport **with access ways for all modes of transport**. Adequate number of truly affordable/starter/co-ownership homes that can generate durable local employment opportunities, not commuting.

Approved **with amendment** by Full Council, 12 October 2020.

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.]

Only so long as the local community's representatives at parish council level have the statutory right to sit at the decision table and their views carry a 60% weighting in the decision for infrastructure spend. The spend should be strictly limited to the immediate area of the development and its service infrastructure, e.g. schools, health services and transport.

- (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 as every area has different requirements.

- (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.]

More value to support greater investment in the community.

- (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.]

Yes, providing it is monitored and returned in full with interest to ensure local infrastructure is delivered.

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.]

Yes, levy should reflect final value obtained.

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.]

Yes and more social housing for the local community.

(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.]

A "right to purchase" should be available for those authorities who wish to purchase. 'In kind payment' would need specific definition.

(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.]

Yes, independent audit.

(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.]

Yes, needs a minimum build quality and accommodation size code.

24 Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

No, definitely not. If anything the rules should be stricter to avoid the sort of abuse we see under the current S106 schemes. 25% to be retained and transferred to parish councils.

(a) If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

Yes, affordable ring fence developed within the appropriate parish.



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?

No, providing the government funds high level consultation within the communities, the impact and therefore feedback could be positive.

Your evidence

Please email your responses to this consultation to [policycomms@nalc.gov.uk](mailto:policycomms@nalc.gov.uk) by 17.00 on 15 October 2020. County associations are asked to forward this briefing on to all member councils in their area.

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