

West Hill Parish Council response to The National Association of Local Council

Document agreed at the WHPC Meeting on 6th October 2020

Planning for the Future Consultation

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

Answer: No. The proposed approach is overly simplistic. While the simplification may benefit developers and landowners, it does nothing to enhance protection for rural communities. Local Planning authorities are best placed to identify local considerations.

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?

Answer: No. This is increasing centralisation, and we would lose some of the ability to have locally defined development management policies. There would be limited possibilities for local people to influence development management policies and this is detrimental.

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?

Answer: No. There is insufficient information as to the definition of a sustainability test, and therefore it cannot be supported.

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

Answer: The government’s approach through this white paper appears to be to end localism and recentralise planning decisions through centrally set housing numbers, national design guides and codes, standardised development management policies etc.

There is no proper strategy for managing growth. The algorithm for establishing housing targets leads to huge growth in the south of England, and little growth in the “Northern Powerhouse” areas. This makes no sense.

Regional Planning and Structure Plans have been abolished. The Duty to Cooperate does not fill the gap. Changes are premature ahead of proposed local government reorganisation.

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

Answer: Strongly object.

The algorithm used in the standard method is deeply flawed. It imposes a centrally-determined formula which takes no account of local factors and local need, which is best assessed by the local planning authority. This assessment can be robustly examined by an inspector at the local plan examination.

Imposing the standard method flies in the face of localism – only 10 years ago Eric Pickles said *“Communities will no longer have to endure the previous government’s failed Soviet tractor style top-down planning targets - they were a terrible, expensive, time-consuming way to impose house building and worst of all threatened the destruction of the green belt”* The proposed method is a complete U-turn.

The proposed method produces a completely unreasonable housing number for East Devon. Under current methodology, 918 house/year are required – already a high number which is difficult to achieve. The new method increase this to 1614/year, a 76% increase. Most of our surrounding planning authorities have similarly high increases. This wide scale growth should only follow a proper national or regional strategy which has been properly planned, based on a full assessment, considering economic factors, infrastructure, environment and social factors, not just the application of a national formula.

Looking at the implications of the proposed method for housing in the whole country, many planning authorities in the south, including rural areas such as East Devon, are facing huge increases, but large cities in the Northern Powerhouse areas see a decrease in housing requirement. This is completely illogical.

It is difficult to see how such a large increase in housing in East Devon could be achieved. Two-thirds of the district is covered by AONBs, a World Heritage Site coastline, and important designated wildlife sites and heritage importance. There are also significant constraints from limited infrastructure, particularly transport links, schools and health services.

It is also difficult to see how so many houses could actually be built. Apart from the issue of finding suitable land, there is no evidence that house builders would wish to build so many houses, and no evidence that there are enough people who would wish to buy or rent them.

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?

Answer: No

The supply and demand principle does not work for the supply of housing. If builders/developers build more houses than they can sell, they do not reduce their prices, they simply stop building more until the market catches up. So building more houses does not improve affordability. This has been borne out by local experience – an improvement in the house price/income ratio was achieved, but due to the creation of more higher paid jobs, not by the price of housing coming down.

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?

Answer: Not sure

It is not entirely clear how growth areas will be defined and identified. However, there is some sense in fast-tracking outline approval for a strategic allocation site, but this implies a greater workload and more detailed assessment at the plan-making stage, rather than dealing with the issues after a planning application has been submitted. It is difficult to see how this could be achieved, with all the necessary community engagement, during an accelerated 30-month plan production schedule.

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

Answer: No

It is not clear how Renewal and Protected Areas will be defined and identified. This does not simplify the planning process, but complicates it. There is not sufficient detail in the proposals to understand how they would work.

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?

Answer: No

Imposing new settlements from above is not successful – they should develop from local initiatives with full involvement and engagement of local communities. There is a need for sufficient funding for the necessary infrastructure.

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

Answer: Not sure

The greater use of information technology is supported. However, the centralisation of Local Plan production is another blow to the concept of Localism, and the ability of local communities to influence the content of their Local Plan.

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

Answer: No

It is obviously desirable to simplify and speed up production of the Local Plan. However, it will make it more difficult for proper community consultation, which is a crucial input to Local Plan production.

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

Answer: Yes

Neighbourhood Plans are an important way for the community to engage in planning.

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?

Answer:

It would be sensible to streamline the review process for Neighbourhood Plans. Community preferences on design are important, but the Neighbourhood Plan should be much more than a Design Guidance.

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?

Answer: Yes

The findings of the Letwin review should be implemented. Greater powers should be given to local planning authorities.

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

Answer: In general, large developments by national housebuilders are unattractive and lacking individuality or elements of local design. There are some smaller developments or individual buildings which are of better quality.

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

Answer: Not sure. In principle, if well-prepared and followed by planners, design codes could be helpful, but they are intensive and time-consuming exercises.

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?

Answer: Not sure. There is insufficient detail on how this would work for us to comment. District Councils are not large enough to employ the right level of staff to do the design function effectively. RIBA has offered to provide design panels to support councils but they are only used on major projects and even then infrequently. More consistent use of these would be cost effective and provide infinitely better results.

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

Answer: No Although. this sounds an attractive idea, the process required to achieve this is unwieldy and time-consuming – so fast tracking is not possible. There would be a risk of imposing standardised design codes and losing local variation and individuality.