

## Answers to Questions in the White Paper on Planning for the Future

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

*Arcane            Complicated            Legalistic*

2(a). Do you get involved with planning decisions in your local area? [*Yes* ]

2(b). If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify] **N/A**

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 – Direct email*]

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]

Question 5.

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

*While it is always desirable to make processes as simple as possible the proposals do more than that, and remove what are important analyses and components regarding land availability, suitability and protection. The question should be 'Can you say this more simply?' rather than 'Can you skip the detail about all this?'.*

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 / No* / Not sure. Please provide supporting statement.]

*It should be for local authorities to define the principles of development management that they consider will work for their area, and then subject these principles to public consultation before they are adopted.*

Questions

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

*The way such a test would work has not been explained but it appears to imply that one element (eg environmental considerations) can be compromised in order to achieve another aim (eg social benefit) while the test should really be about all elements being achieved holistically.*

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

***Through such issues being specifically referred to neighbouring authorities in the local plan-making process, with evidence that such issues are at least acknowledged, if not resolved.***

Questions

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.]

***The imposition of targets through a simplistic algorithm would pay no regard to deliverability in the light of local circumstances, and seems to be based on the premise that past performance can be infinitely projected forward, whereas in reality authorities will be at the mercy of a perfect storm of targets, lack of land and the profit motive of developers.***

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.]

***Local authorities do not determine house prices. This is entirely in the hands of the developers and the prices that they think they can command for their buildings.***

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.]

***To deprive local planning authorities of the right to determine individual applications meet the relevant requirements for a defined development area would be to impose a free-for-all for developers and also deny the local community the long-established role in responding to planning applications from personal knowledge.***

9(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.]

***In respect of Renewal areas, 'presumption in favour of development' would provide developers with a trump card that pays no attention to the desirability and suitability of an individual proposal, and would deprive both the local planning authority and the local community of the necessary involvement in any proposal from initial concept to ultimate application.***

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 / No / Not sure. Please provide supporting statement.]

Question 10.

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

***Large and complex development proposals must necessarily require more documentation, whatever format is adopted. To impose a single limit on this process would deny planning authorities and the local community the opportunity to evaluate and challenge the viability of large projects.***

Question 11.

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

***Accessible and on the web yes, but as one methodology so that the local community still has the chance to attend exhibitions, talk to local plan-maker and consult real documents, especially where people lack digital skills or access, must be retained.***

Question 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.]

***Only if all the current provision for local consultation and comment is fully retained and the existing need for authorities to analyse and justify their proposals is maintained.***

Questions

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

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?

***No particular views to offer.***

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*** / No / Not sure. Please provide supporting statement.]

***There should be an incentive (perhaps reflected in CIL contributions) for developers to share a large planning application with one or more other developers to speed the potential for faster build out, and/or for the delivery of the resultant buildings to be assigned to more than one builder, and particularly a local one.***

Questions 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]

***To be fair, there are examples of both, but poor design has predominated, in terms of both appearance and actual defects. Perhaps the local authority should ask the local community to name the developments they like and the ones they don't, with reasons, and publish the results. Developers claim that their homes are high-quality so they should not be afraid of local opinion on their products.***

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]

***Did you really mean to allow only one priority? We would not wish to exclude any of the above.***

Question 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.]

***But there has to be some way that local planning authorities can decide that an application is so defective in relation to their guides/codes that it should be rejected on those grounds.***

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

***But both the new body and the officer for design and place should have the teeth to affect actual planning applications.***

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 / No / Not sure. Please provide supporting statement.]

Question 20.

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

***We all want our neighbourhood to be full of beautiful rather than ugly homes, but it is equally important that they meet every other requirement for functionality, energy-neutrality and general sustainability.***

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**]

***All of the above.***

Questions 22

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 if it does not allow developers to avoid building affordable homes through paying an enhanced levy.***

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***]

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 overall / ***More value*** / Less value / Not sure. Please provide supporting statement.]

22(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.]

Question 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.]

***Although we are not in favour of permitted development rights as a means to avoid scrutiny of individual planning applications.***

Questions

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.]

***Actually, we need more than applies at present.***

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

***It should be provided on site.***

24(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.]

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

***As in our answer to question 17, local authorities should be given the teeth to refuse applications which do not meet minimum design standards.***

Questions

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

***By this we mean that local authorities should set out for the local community the purposes for which they intend to use Levy income.***

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

***As indicated in the previous answer.***

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?

***The proposals that involve less community consultation and greater reliance on computer technology may reduce the opportunities for such local people to participate in the planning process.***