



MERROW RESIDENTS' ASSOCIATION

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Consultation on White Paper 'Planning for the Future'

Herewith comments of the Merrow Residents' Association on the above White Paper.

Kind regards

Andrew Strawson
Chairman

Q1: *What three words do you associate most with the planning system in England?*

Response: Critical, Centralised, Complicated.

Q2: *Do you get involved with planning decisions in your local area?*

Response: Yes.

Q2a: *If no, why not?*

Response: n/a.

Q3: *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?*

Response: The present system for finding out about plans and commenting does work reasonably satisfactorily and the proposals should enhance what is now available.

Q4: *What are your top three priorities for planning in your local area?*

Response: 1) Keeping housing targets under control with houses built to high and sustainable standards
2) Protecting the existing Green Belt and AONBs
3) Providing adequate infrastructure on time.

Q5: *Do you agree that Local Plans should be simplified in line with our proposals?*

Response: No. These cynical proposals will only increase housing targets and threaten more green and open spaces without proper infrastructure.

It concludes that the new system will encourage developers to develop more homes- this is a totally incorrect assumption as developers real objective is to maximise profits.

This will deliver on Government policy only if clear and demanding standards are included – which are appropriate to the locality. Otherwise we store up further cost and remediation effort within the next 10-20 years. This supports inefficient and damaging resource usage.

Q6: *Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?*

Response: No. This will lower the quality of house building, encourage high rise developments, adversely affect the character of some areas and move even more control to the centre. It can only succeed if a demanding framework and set of standards are included – to level up housing delivery, rather than dumb it down.

Q7a: *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?*

Response: Not sure. The present tests are so high level that the Inspectors have far too much flexibility on interpretation of Government guidance.

We need clear and agreed advice that can be widely understood and implemented placing more and not less ultimate responsibility with local authorities and less with the Department Inspectors. Sustainable development would be a creditable aim – if defined and unambiguous and continually improving in line with best and developing practice. Without conscious and proactive and continuing Government oversight, these are meaningless aspirations and will fail.

Q7b: *How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?*

Response: It is clear that there will be some need for cross boundary co-operation to cover specific sites that straddle the boundary and to ensure that the landscape and views across the landscape are not damaged. There should be no requirement for one authority to absorb any of the housing target of a neighbouring authority.

Q8a: *Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?*

Response: Yes. There are many housing constraints one of which is the need to preserve the Green Belt - an obligation that should be strengthened.

Q8b: *Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?*

Response: No. We fail to understand this obsession with affordability when the homes that are supposed to be affordable aren't affordable to the younger generation.

The emphasis should be changed to promote the construction of small new start up homes that the younger generation can afford to buy. This emphasis is opposite to the typical strategy followed in most developments.

We are aware of the Government's ongoing affordable building programme where the emphasis is on new build affordable housing but the bar is too high and although it will assist some through the various elements of the scheme it doesn't cater for those who are on lower incomes or in high cost areas such as the south east of England.

Local capacity should be used as a guide to the extent to which new development is feasible and not existing urbanisation which in many areas - including our own - is already being stretched too far.

The concept of capacity should be reintroduced as part of the equation. Capacity is an essential pillar of sustainable development.

Q9a: *Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?*

Response: No. Local Plans do not go into the detail that is covered by an outline planning consent nor do the public have the same ability to comment on the site details and influence events at the time that a Local Plan is being developed.

All this will do is to place more emphasis on the detailed site proposals in the Local Plan and this will be exceedingly difficult and will be submerged under the other key areas that need to be covered. For instance it is critically important that the infrastructure details are agreed at an early formative stage and well before the detailed planning stage.

Nothing is to be gained by removing the need for outline planning consent for large strategic sites.

Q9b: *Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?*

Response: Yes, they do seem reasonable assuming that full planning consent would still be necessary for all developments except where the permitted rights arrangements apply.

However protected sites must have a level of protection that ensures that developers do not have any wriggle room to circumvent the clear intentions of the regulations.

In particular the Green Belt and AONBs must be given the fullest protection possible.

Q9c: *Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?*

Response: No comment.

Q10: *Do you agree with our proposals to make decision-making faster and more certain?*

Response: No. The proposals would diminish the quality of decision making and take it further away from Local Authorities and the local democratic process.

Good decision making takes a considerable amount of time if there is to be meaningful public consultation since the results are practically irreversible.

Q11: *Do you agree with our proposals for accessible, web-based Local Plans?*

Response: Yes. We recognise the potential of moving to a web-based standard for planning documents. However we also recognise that planning documents must be available to all- including those who do not have full access to the internet so that everyone can participate in the decision-making process.

Data can very easily be selective or incomplete so it is essential to ensure that all data including comprehensive maps and illustrations are not omitted.

Processes should be streamlined but the quality of the process must never be diminished.

Q12: *Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?*

Response: Not sure. A tight timescale is reasonable but with full and proper public consultation and equally detailed consideration of the responses many authorities may find such a timescale extremely tight if they give full detailed consideration to the planning complexities in their area.

Q13a: *Do you agree that Neighbourhood Plans should be retained in the reformed planning system?*

Response: Yes. They have been shown to have value in the context of local democracy and to preserve the character of the areas covered by these Plans.

Q13b: *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?*

Response: Although we are in full support of the concept of Neighbourhood Plans we fail to see how the principles in this White Paper would improve the focus of Neighbourhood Plans or the quality of housing within these areas.

On the other hand we do support any initiative that makes it easier and less bureaucratic for new Neighbourhood Plans to be developed and to protect the character of areas covered by these plans. In particular it would be very helpful if those preparing a Neighbourhood Plan were able, as of right, to have access to all Local Authority documents relating to their area such as maps, planning applications and other planning documents.

Q14: *Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?*

Response: Yes. Developers should be encouraged to build developments faster since at the moment there appears to be too much land banking.

Q15: *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]*

Response: In the main new developments are satisfactory although in some cases homes are cramped and there is insufficient and unrealistic car parking provision.

Q16: *Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?*

Response: Energy efficiency
Open spaces
Retention of the Green Belt
Preservation of AONBs
Water conservation

Q17: *Do you agree with our proposals for improving the production and use of design guides and codes?*

Response: No. This will reduce the quality of new developments and is likely to produce more housing estates rather than attractive and unique housing developments.

Q18: *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?*

Response: Yes and no. If this proposal is progressed then there does need to be a body to support design but we don't agree that each Local Authority should have a chief officer for design. This is unnecessary interference from the centre as to how a Local Authority manages its own affairs.

Q19: *Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?*

Response: Not sure.

Q20: *Do you agree with our proposals for implementing a fast-track for beauty?*

Response: Not sure.

Q21: *When new development happens in your area, what is your priority for what comes with it?*

Response: More sustainable infrastructure including roads, transport, energy, water and sewage provision.
More green and recreational space.

Variety of home sizes to cater for different levels of occupancy-consciously designed for individuals, couples, young families, large families and senior citizens.

Q22a: *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?*

Response: Yes. This consolidation makes sense and is fairer than the present system.

Q22b: *Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?*

Response: It should be set at an area specific rate since the infrastructure requirements vary so much from area to area.

Q22c: *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?*

Response: The levy should aim to capture the same amount of value overall as the alternative would be an unwarranted tax on new developments where the local community would not benefit.

The levy shouldn't be seen as a general tax; it should be used for specific purposes in support of the development where it was raised.

Q22d: *Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?*

Response: Yes. This is necessary as the payment of the levy would not be due until development completion by which time the necessary infrastructure improvements should be in place.

Q23: *Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?*

Response: Yes - this seems both sensible and equitable.

Q24a: *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?*

Response: Please see answer to Q 8(b).

Q24b: *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?*

Response: Please see answer to Q 8(b).

Q24c: *If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?*

Response: Please see answer to Q 8(b).

Q24d: *If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?*

Response: Please see answer to Q 8(b).

Q25: **Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?**

Response: No. It is imperative that the majority of the levy is spent on infrastructure improvements and is not frittered away on vanity initiatives unrelated to the development from which it was raised.

Q25a: *If yes, should an affordable housing 'ring-fence' be developed?*

Response: n/a.

Q26: *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?*

Response: No.