**Planning for the Future**

**Consolidated response**

Town Forum and Civic Society

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

Complicated, under-resourced, passive

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?

i) Social media

ii) Direct online communication

iii) Site notices explaining where details can be seen.

 *Don’t feel there is much value now in local newspaper advertising*

4. What are your top three priorities for planning in your local area?

i) Environment etc

 ii) Infrastructure

 iii) relating development to local needs eg. location, amenities, density etc

 *Affordability dealt with later in responses*

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

TBA

 *Don’t believe permission in principle is compatible with proper assessment*

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

TBA

*Local Plans should cover much more than building lines etc to provide context for decisions and guidance to developers.*

7a) 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.

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

 Co-operation within a regional planning framework.

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

TBA

*i) Basic problem is supremacy of national target of 300,000 pa. This is not based on any assessment of capacity of sites, development industry or local market. Any such calculation should be only a guide. Its application to a local area should be based on the constraints and opportunities of that area assessed locally.*

*ii) As a guide approach is flawed by dominance of `stock` figure set too low and resulting in large adjustment for `workplace affordability` (making TW very unaffordable). Resulting figure a nonsense (1.2% pa increase nationally and 1.8% for TW).*

9a) Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?

Not sure. It requires a fool-proof mechanism for ensuring all important matters are decided at outline stage. This implies the consent would be less than `automatic`.

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

It is already the position in effect that consent in principle is given by the inclusion of a site in the Local Plan. But nearly all development in Renewal and Restraint areas takes place on sites not identified in the Local Plan.

9c) Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

No. Especially with ending of Duty to Co-operate, new settlements and major extensions should be brought within a regional planning framework.

10. Do you agree with our proposals to make decision-making faster and more certain

Not sure. It’s not wholly clear what is proposed. Shorter development statements welcome but scope to define and standardise technical information limited. Specialist case-by-case knowledge is required to ensure all necessary information provided at validation stage, beyond limitations of checklist. `Modular software landscape` is not understood.

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

Not sure. The objective is fine but requires careful definition of digital methods to ensure local plans are comprehensive, flexible, and suitable for wider participation. Are instantaneous updates compatible with democratic decision-taking?

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

Not sure. This seems too short without seriously eroding opportunities for public involvement.

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

 Yes. Needs supplementing with a mechanism for assessing community views more quickly and more suited to urban areas. This should recognise the divergence of views and enshrine the role of decision-taking by local representatives.

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?

Digital tools (as opposed to communications, mapping etc) do not appear to have a role in Neighbourhood Planning. There would be a role for successful case studies, templates and documentation to aid production of Neighbourhood Plans by local communities.

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?

In principle prompt completion is desirable, and division of larger projects into sub-areas for realisation by separate developers also desirable, to bring in the inventiveness and architectural diversity often missing from larger projects, and promote participation by SME developers. This requires a master-plan.

However, this doesn’t facilitate prompt completion, which seems to require either penalties for late delivery or independent control of the masterplan and the infrastructure.

With a wholly private sector project the main developer would have to cede or sell parts to sub-developers. He would thereby lose control of timing, and face reduced activity, a loss of profit, and competition for construction materials and services and in achieving sales. He would probably need to assume responsibility for overall infrastructure to ensure timely delivery. Achieving this by contract would be possible but be an unwieldy and complex means of procuring development.

An alternative approach would see an independent body or contractor acting as developer under a masterplan, responsible for planning approvals, the design and execution of the common infrastructure, and maintaining an overview of the separate development elements. This would provide a way to set up and initiate the overall project and give an unimpeded run for the individual developers. The independent body could be private or public/private or public. A publicly funded element could allow more certainty about the funding and starting of the project including its main infrastructure. Thereafter, penalties could ensure timely completion of the sub areas.

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

The design of recent development in the borough has been of mixed quality, especially in house-extensions, with some recent larger developments notably poor in materials and specification. The present planning system does not facilitate engagement with poorly conceived proposals for external materials and detailing. There needs to be an ability to query and ascertain suitable and locally appropriate design and specification.

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

Sustainability requires a variety of responses reflecting local circumstances. The main priorities involve:

i) reducing car dependency through dissuasion and better public transport provision, and

ii) appropriately intensifying development to improve access to facilities, and make public transport more viable, and

iii) more green and open spaces, sustainable urban drainage etc.

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

Yes. Design guides etc welcome but their usefulness is quite limited. Danger in making them mandatory.

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?

Not sure. No need for new national body but chief planners should have specific role and powers for design and place-making.

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

Yes as far as it goes, but dangers in separating `beauty` from functional issues (in fact beauty on its own doesn’t mean very much).

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

Not sure. Strengthening the NPPF is welcome, but

i) Most developers seek the earliest possible planning consent to secure and improve the value of their initial investment. Any formal obligation to conform to a centrally defined standard of `beauty` would increase the incentive to limit the design effort and time committed. It would lead to bland uniformity and a lack of proper consideration in the development of designs.

ii) Regarding the second proposed measure, it is not clear how design codes could be made to respond to the whole variety of local situations, and any obligation to conform to them carries a similar risk of the developer being tempted into the same design conformity.

iii) The third measure could help allow smaller projects to progress easily and support prefabrication. However the detail of the proposal would have to be carefully defined to ensure that the desirable differences of regions and locations would be fully expressed in the results.

21. When new development happens in your area, what is your priority for what comes with it?

Each site presents different opportunities and demands and a general answer is not possible.

22. 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?

TBA

 *Feel it’s urgent to replace s.106 with a generally understood charge which is unavoidable, applies uniformly, captures the value from all sorts of development including change of use and Permitted Development, and allows the local authority discretion to apply the proceeds.*

22d) Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

TBA

 *The problem with CIL (and s.106) is that they are levied retrospectively but infrastructure is required from the outset – this can lead to a gap of up to five years. Something is needed to avoid forcing local authorities to borrow for this time.*

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

TBA. See above.

*There may be operational difficulties.*

24a) 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?

Affordable housing obligations have been widely avoided in this area and much more is needed.

24b) 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?

In-kind preferred but most important objective would be to maximise delivery of affordable housing with local authority determining size, location, tenure etc.

24c) If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

Not sure.

24d) If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

Normal planning and building regulation processes should ensure this.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

Yes.

25a) If yes, should an affordable housing ‘ring-fence’ be developed?

Not sure.

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.

ART/RTWCS/Consultation/Govt consultations/Planning for the Future draft response 201020