

The Purbeck Society – response to Planning White Paper Consultation by 29th Oct 2020

Q No.	Question	Draft Response for Discussion
1	What three words do you associate most with the planning system in England?	Developer led, mis-leadingly legalistic/imposed and top down.
2 2a	Do you get involved with planning decisions in your local area? 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.
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]	It would be wise to embrace all methods of communication.
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]	Increase the affordability of houses; the environment and action on climate change; support for the local economy.
5	Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]	No. The zones are development orientated; even the protected status can allow development to take place under planning applications. Multi authority or regional planning for infrastructure such as rail, roads, employment is also essential.
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. National policies are too general and that they do not fit the context of the locality. Policies for Dorset that fully reflect the environment, wildlife, heritage and the local needs should all be the key drivers. Heritage is not given a high profile locally in terms of maintaining and enhancing Conservation Areas.
7a 7b	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.]	No. The proposals would reduce the strength of sustainable assessments. Meaningful applications of sustainability locally to be applied to employment, housing, infrastructure and the environment. Examining and revisiting spatial planning over a large area.

	How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?	
8a	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.]	No. The standard method is unreliable and flawed. Opinion Research Services (ORS) was commissioned by Dorset CPRE to establish a robust and independent evidence base on housing need in Dorset. The June 2020 report found that Central government's housing targets, using 2014 projections, are 47% higher than the existing Local Plans in Dorset. The government's housing targets are way in excess of any sensible forecast of local housing need. The research from Lichfields also produces an excessive number of houses well above local housing needs.
8b	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.]	No. Affordability cannot easily be addressed in rural areas without subsidies from government, as it impacts on viability. Economies of scale work in urban areas, but not in rural locations.
9a	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.]	Absolutely not. Outline planning eliminates public consultation. Details of developments should be subject to public scrutiny and public engagement at all stages.
9b	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. The proposals compromise adequate scrutiny.
9c	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.]	Yes. This would aid coherent development.
10	Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]	No. Decision making should be thorough, considered and evidence based. Faster decisions are not always better decisions.
11	Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]	No. Digital civic engagement tools should not be the sole service of demonstrating proposals. There are issues of access and equity with such tools.
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.]	No. The period is too short for effective engagement and research given the current resourcing of local planning authorities.

		The proposals don't allow for considering alternatives which is essential for optimal outcomes.
13a	Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]	Yes. They enable community inputs into local plans.
13b	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. We do not agree with your objectives. Neighbourhood Plans should fully reflect the aspirations of local communities rather than the dictates and policies of the local plan.
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.]	No. Developer driven proposals may imbalance tenure types. A punitive charge to the developer would ensure development goes ahead.
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]	There is tension between the number of properties and the quality of design -design should be dominant. There have been examples of poor-quality building by developers and visually intrusive buildings approved in the AONB. In Purbeck the AONB has not been properly resourced. Several planning permissions granted in the AONB demonstrate harm.
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]	High yet genuine sustainability impacts and limits development in rural areas. This must include a whole range of measures including affordability, infrastructure and employment leading to sustainable communities.
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.]	No. Design guides and codes require greater legislative force.
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.]	No. Each local authority has a planning team whom should be allowed to have a role in design and place making to reflect local community wishes.
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. Increased emphasis on high quality design is needed.
20	Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]	No. Fast-track compromises thorough assessments.
21	When new development happens in your area, what is your priority for what comes with it?	More affordable housing; better infrastructure and an ability by the local authority to enforce these facilities.

	[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]	
22a	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.]	No. Clarity is required over payment of levies and the beneficiaries.
22b	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]	No. One size does not fit all, appropriately set to the locality.
22c	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.]	Any reform of Community Infrastructure Levy should aim to increase the contribution to community resourcing.
22d	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.]	No. This is unreliable and variable.
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.]	No Comment
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? [Yes / No / Not sure. Please provide supporting statement.]	No. Aim to secure more genuinely affordable housing.
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? [Yes / No / Not sure. Please provide supporting statement.]	No. Other ways should be employed.
24c	If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]	No. Avoidance is preferred to mitigation.
24d		No Comment

	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.]	
25	Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]	Yes. Local authorities should have more freedom within the application of the relevant policies.
25a	If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]	Yes. In the case of supporting the development of affordable housing ring-fencing is recommended. The effects of ring-fencing need to be reviewed in terms of their contracts.
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?	Reliance on digital communications and engagement may discriminate against the elderly and those without adequate IT access.

We have responded to the earlier consultation on Changes to the Planning System submitted on 1st October. We will submit the following comments via email to planningforthefuture@communities.gov.uk:

Housing Needs Evidence for England

A Review of the National Housing Need for England, produced by Opinion Research Services in July 2020 for CPRE Devon, reports the following:

Figures evidenced in this report show that to meet the projected household growth, together with the identified 'backlog', would require approximately 2.30 million additional dwellings over the 10-year period 2016-26. Given that 681k dwellings have already been delivered between 2016-2019, this means a further 2.30 million homes would be needed over the ten years to 2030 - **an average of 230k per annum**. From **2030-2035 no more than 157k homes a year would need to be built**, and even fewer - around 146k a year - from 2035 to 2040.

In light of these findings, we believe there needs to be an urgent review of national housing building targets and policies which currently force metrocentric housing targets into rural areas. **These targets fail to deliver for local people** by deliberately encouraging private developers to build thousands of unsuitable, unsustainable and unaffordable houses all over our countryside.

Housing Needs Evidence for Dorset

Opinion Research Services (ORS) was also commissioned by Dorset CPRE to establish a robust and independent [evidence base on housing need in Dorset](#). The June 2020 report found that Central government's housing targets, using 2014 projections, are 47% higher than the existing Local Plans in Dorset. The government's housing targets **are way in excess of any sensible forecast of local housing need**.

Any future planning system must make appropriate provision:

a) for Dorset's environment, wildlife and heritage to be suitably safeguarded (Dorset County Council having identified these as the county's greatest economic asset), and

b) for an adequate supply of genuinely and sustainably affordable homes for local people, where these are needed in our local communities.

Our further, very serious concern, is that the planning system should be more, not less, democratic and responsive to local people, and that any proposals do not weaken or reduce communities' say in planning their future.

The Purbeck Society has long campaigned for the right number of homes to be built in the right locations including genuinely affordable homes for local people, and prioritising the use of brownfield first.

We hope you will take the above points into consideration when reviewing responses to this consultation.