

**BROXTED PARISH COUNCIL RESPONSE TO PC11-20 WHITE PAPER - PLANNING FOR THE FUTURE  
RESPONSE TO NALC CONSULTATION QUESTIONS.**

***1 What three words do we associate most with the planning system in England?***

Slow, confusing, inconsistent.

***2 Do we get involved with planning decisions in our local area?*** - 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?***

We dispute that the proposals will make it much easier to access plans etc. This is currently not difficult. The White Paper talks of putting a new emphasis on engagement at the planning stage but it is notoriously difficult to engage the public at the early planning stage. It goes on to say that it wishes to “streamline the opportunity for consultation” ie to reduce it as “this adds delay to the process and allows a small minority of voices ... some from the local area ... to shape outcomes.” This looks to us like an attempt to limit consultation.

To answer the question directly, so that a lay person can easily find out about plans all media would have to be used - social media, post, newspaper etc.

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

Protection of existing heritage and green spaces.

The environment, biodiversity and action on climate change.

Increasing the affordability of housing - ie not building largish, largely unaffordable estates which fill up with commuters with little investment in the local area.

***5 Do you agree that local plans should be simplified in line with our proposals?***

We believe that decision making should be speeded up but not necessarily at the plan formation stage. In our experience the most significant delays have not been at the consultation stage but at the decision making one. Both local planning departments and the government inspectorate are at fault here. It would limit consultation and exclude certain stakeholders if the initial planning stage was too hasty.

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

Not if they are decided by algorithms! Local expertise and knowledge should not be downgraded. The White Paper states that “development management policies will be designed nationally with a more focused role for local plans in identifying site and area specific requirements” which reads as if the only role for local government will be to mitigate against wrong decisions by central government.

***7 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?***

We would need to see far more information in order to answer this. Unfortunately we have all become more cynical about what constitutes “sustainable development.”

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

This sounds like common sense until one reads about the possible repercussions of the method suggested (rural areas to have a 59% increase in housebuilding, urban areas to have a 20% reduction according to analysis reported in the Times).

**8b Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?**

We do not agree with this statement as it relates to affordability. It is too simplistic. It would necessarily lead to currently more expensive areas receiving more housing when other factors might suggest that this was not a good idea. To carry the affordability argument to its logical conclusion, attractive rural areas would receive so many new houses that they would no longer be such which looks like levelling down rather than the Government's much vaunted levelling up.

A related point is that house prices will never fall ie become more affordable whilst private developers hold the reins. They do not build if doing so leads to price falls. The government's report states that "construction rates are at a 30 year high in 2019." If this is so why are house prices not falling? It is not clear in the White Paper how affordable housing would be delivered any more successfully than currently.

We cannot comment on the "urban areas" aspect of the question as Broxted is a small rural parish.

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

These would have to come with accompanying safeguards against developers land banking rather than building. The White Paper states that "more good quality, attractive and affordable homes can be built faster" but is not clear how. Growth areas may end up suffering from poor quality too lightly regulated housing (the slums of the future) unless stringent rules are applied.

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

We are concerned at the lack of nuance for example Broxted is in the Countryside Protection Zone for Stansted Airport which theoretically discourages new buildings and yet we would welcome small scale affordable and attractive development. We believe that there is a danger that Protected areas would become fossilised and unwelcoming.

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

We would have to be persuaded. The NSIP regime has not had a happy history and we foresee great difficulties in gaining agreement from all interested parties.

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

If they can be achieved, then we do agree. However, we would not welcome a faster early stage process as all local stakeholders need time to study any proposals. As a council we have been given unrealistic consultation deadlines (eg a month during August in pre-covid days) which we would hope would not continue; however once all interested parties have had a chance to comment the process definitely needs speeding up. Developers should not be expected to wait months or years for a council to make its decision.

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

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

LPs currently seem to take an interminable time to produce but we do not feel able to fully comment, never having been involved in producing one. We would be concerned that corners would be cut especially on environmental aspects.

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

Absolutely as they represent Localism at its best. The White Paper states ominously “we will want to consider whether their content should become more focussed to reflect our proposals for local plans” which does not inspire us with confidence.

**13b How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and community preferences about design?**

Having read various neighbourhood plans we conclude that digital tools are already in fairly widespread use. Community preferences about design would clearly require meetings with developers in order to find a compromise. It is optimistic to suppose that this process would be quick.

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

Of course! Developers should build out one site before starting on others locally.

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

Formulaic, ugly, not in character with the area, lacking inspiration. Total lack of consideration for the impact on adjacent areas, transportation, schooling and employment opportunities. Effectively leading to a potential dormitory town for nearest city.

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

We are a rural hamlet/village with no mains drainage or gas and a limited bus service. It is naïve to assume anything but continued reliance on private vehicles. Our priorities are therefore for energy efficiency in new buildings (heat pumps etc to mitigate dependency on oil fired central heating) and the maintenance or even expansion of public open space. We support the inspirational idea for nearby Easton Park which is rather than building a new town on the site to create a country park. This would take the pressure off nearby internationally significant Hatfield Forest which has suffered severe and continuing degradation thanks to nearby housing developments built with not enough green space.

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

If these were of international levels of excellence. It's a long shot ... We are not sure what the White Paper means when it says that these codes will be prepared locally “based on genuine community involvement rather than meaningless consultation” as surely community involvement can only start with consultation? They will presumably depend on the quality of council design teams which at a

time when the brightest and best can earn far more in the private sector is a possibly terrifying prospect.

**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. We are pleased that this would be a role in each authority, not a central diktat (but see above). There should also be a strict set of rules and guidelines to ensure that the criteria that control the decision making process are agreed at the local level by residents and local government rather than developers and investors.

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

Wholeheartedly. This should incorporate sustainability and is a chance to ensure that new homes are indeed “zero carbon ready” as the White Paper suggests.

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

In principle yes. In practice this may be harder. After all, “beauty is in the eye of the beholder” and there is a danger that fat cats with influence will be able to build monstrosities. A palace is “beautiful.” A couple of sustainable affordable houses may be far more relevant to the needs of the local community.

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

This is a hypothetical answer thinking of development close to but beyond our immediate area - more affordable housing, necessary infrastructure of which green space should be an essential part, not an add-on. The ability to live, work and be educated and entertained locally without having to drive long distances to achieve any of the above.

**22-26 Questions on infrastructure levies and on people with protected characteristics** - we are not qualified to comment. However, monies acquired this way should be spent locally so that communities which are impacted see some benefit, not at the other end of the authority which is sometimes many miles away.

In conclusion, we agree that the planning process needs streamlining and that decisions currently take too long. However we are concerned at the seeming disappearance of local autonomy outlined in the White Paper and hope that the government will reconsider the proposed use of an algorithm in deciding how many house to allocate where. This is too blunt an instrument for too complicated an issue. It hands developers yet another tool to bully and attempt to overrule the wishes of the local community through the courts.