

Fressingfield Parish Council Suffolk: Response to Government Consultation Changes to the Current Planning System September 2020.

Preamble	
<p>Fressingfield Parish Council welcomes the opportunity to respond to the government thinking.</p> <p>Our Context:</p> <p>Fressingfield is a small rural community on the border of Suffolk and Norfolk. It is a parish with a village centre of some 350 houses and outlying farms and homes amounting to some 1000 residents, and a total of 450 homes. There are 2 grade 1 listed buildings and 53 grade 2 listed. 54 houses have been approved for building which are within the current planning system and expected to be built. Fressingfield has been designated a hinterland village by Babergh Mid Suffolk District Council (BMSDC) in their draft local plan.</p> <p>The current infrastructure includes a medical centre, serving beyond the village; primary school; village shop; a public house and a restaurant. A number of small individual companies operate from within the parish. There is no bus service and reliance is on cars.</p> <p>It is primarily an agricultural community with a relatively high proportion of older residents, families and some single residents. There is a small demand for affordable housing which is currently lacking. We have a robust neighbourhood development plan (2018-2036) consulted on and endorsed by the vast majority of the parish.</p> <p>Government thinking.</p> <p>We question the need for building 300,000 homes annually. We think the calculations are flawed. The government is missing an opportunity to encourage developers to develop not just new homes but capitalise on the significant numbers of empty properties (every council has an empty property list), and change of use of properties; the latter being likely to increase given the changes in working practices as a result of the current pandemic. With the rising numbers of older people the demand for downsizing and 1-2 bedroom accommodation both in the ownership market and rental sectors is increasing. There is no mention of 'buy to rent' within this white paper, a serious missed opportunity, particularly as this market is strong and likely to increase.</p>	
Questions	Response
<p>Step 1.</p> <p>1. Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock</p>	<p>No.</p> <p>As a small rural community, the draft local plan from BMSDC gave clear figures for housing that each community would be expected to be support. These were reasonable and achievable and wouldn't destabilise the communities and were specific to each community.</p> <p>Para 21 suggests that household projections 'are still the most robust estimate of future growth' so remain with that. To introduce another metric of percentage of existing housing stock (0.5%) appears to be a desperate way of manipulating the housing figure purely for economic benefits and certainly not for local communities.</p> <p>If the percentage of housing stock was used as an alternative metric then</p>

<p>in each local authority area OR the latest household projections averaged over a 10-year period?</p>	<p>would that include all the housing in a borough, parish or town/city? To use Fressingfield as an example we enjoy a core urbanisation of about 350 dwellings which would suggest an increase of about 18 houses using the 0.5% figure. If we took all the dwellings in Fressingfield that lay further outside the core urban area (450) that figure would increase to 23 but those 23 houses would be expected to be borne entirely within the more concentrated housing and not spread across the entire parish. The impact of this would be felt more acutely in larger communities where the figures would be much higher.</p> <p>To project forward using the household growth for 10 years has always seemed a clunky metric. If projected 10 year growth was used to provide sufficient housing within the first 1 -2 years and the key employer for that area moved then there might be many houses built in the wrong area – see chicken factory in Weybread as an example or Dowdswells in Harleston. Agreed people will travel to work and so housing built on the doorstep is less crucial but if that is the case it begs the question ‘why use this formula for every community and not concentrate on those larger communities whose infrastructure can absorb larger development more readily’.</p> <p>Also household growth can change hugely over a 10 year period – to titrate housing growth steadily over that 10 year period to match the population growth is reasonable however, as we all know, housing development rarely follows that pattern and developments are usually of a larger size to make them viable and therefore don’t map to population growth particularly in small communities.</p> <p>Growth planning needs to be proportionate to the existing housing. Existing neighbourhood development plans should carry considerable weight.</p>
<p>2.In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why</p>	<p>No.</p> <p>As a small rural community we strongly urge that there should be a rural and urban calculation and not a one size fits all. This appears to be a calculation fit for urban communities.</p> <p>It makes sense to us that the metric should be applied to communities with a threshold of higher than a certain size. In small communities that maths can create inequalities due to the low numbers involved and therefore would be more relevant to larger communities. This concept is expanded in para 41 which is reassuring for smaller communities.</p>
<p>Step 2</p> <p>3.Do you agree that using the workplace-</p>	<p>No.</p> <p>This proposal rather assumes that people want to live near where they work. Whilst environmentally this makes sense the reality of people</p>

<p>based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why</p>	<p>moving jobs regularly means they will often travel. Also the changes in working patterns following the pandemic have seen a huge increase in people working from home and will continue to do. Therefore the need for housing that people can afford near where they work will become less important.</p> <p>It is not just about workplace. Although workplace is a factor in choosing a home for those without children, those with often put schooling ahead of ease of access to workplace. (All property details will state nearest schools and the Ofsted ratings)</p> <p>A good school locally will put thousands on the price of a property. Catchment areas in some areas mean one side of street are more valuable than the other.</p> <p>Para 31 suggests high house prices directly indicates an imbalance between supply and demand of housing. Our argument is that we need to ensure a stock of social housing is available for rent only, within each community, together with starter homes with flexible/creative purchase opportunities and self-build schemes. Gerrymandering should not try and create a consistency for every community.</p> <p>Certain parts of the country however would benefit from an adjustment, particularly in those areas where second homes are attractive and make house buying for locals almost impossibility such as Cornwall and Norfolk/Suffolk coastal communities.</p> <p>Again emphasising that size does not fit all.</p>
<p>4.Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.</p>	<p>Yes</p> <p>However, reassurance should be obtained that this would be over a period of years to identify trends rather a snapshot which could create anomalies.</p> <p>Para 36 misleading as x4 earnings for a mortgage is not actually how it is calculated. It is x3 or 4 (dependant on disposable income) stress tested at 5%. (see my point in additional info)</p> <p>Maths not a government strong point! But, we agree a value based on disposable income to the value of 4 is used</p>
<p>5.Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.</p>	<p>No.</p> <p>It does not take into account the changes in the housing stock and cost due to changes in building methods or government legislation on zero carbon emissions etc which make the houses more expensive to convert and build.</p> <p>e.g. No property can now be rented out below an E rating and there are plans to get all rentals up to at least a B – removing at a stroke nearly all Victorian terraces.</p>

	<p>What geographical area is the weighting applied to? If it was used across the whole of for example greater London then it is meaningless, better to detail boroughs and similarly in Suffolk will it be assessed to a community level. In other words will it apply to specifically Fressingfield and be assessed separately for Weybread and Stradbroke?</p> <p>Unrelated to this question the issue of buy to rent and second home owners needs to be taken into account with any standard method changes with protection for local potential home owners and their accessibility of the housing market. Too late for many communities, such as Southwold, but surely this is a creeping malaise that needs addressing across the whole of country; not just rural England. The Welsh Assembly are well-down the track in addressing this imbalance, especially within their National Parks and those specific employment opportunities: house - purchase being linked to what 'skills' the purchaser brings.</p>
<p>Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:</p>	
<p>6. Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?</p>	<p>Yes.</p> <p>There has been considerable delay in BMSDC bringing their local plan to completion they need to get on with it.</p> <p>Para 41. Do we agree that 76% of local housing need should be nationally focused? Is that high enough? If not, is the formula wrong? If it means that 24% is to become locally focused, as opposed to already being that figure, does this bear any relation to the scope for local social housing requirement or simply a development regulation?</p> <p>We think 80% is correct and in action must be better than 100% right and not in action.</p>
<p>7. Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate?</p>	<p>Yes</p> <p>Planners need to be on top of this.</p> <p>For some local authorities, who have seen a churn in their planning department staff over the past 6 months during the pandemic, these time frames are going to be unachievable. It is essential that this scoping exercise is done accurately and is detailed and shouldn't be compromised due to unrealistic and unnecessarily tight timetables.</p>

<p>If not, please explain why. Are there particular circumstances which need to be catered for?</p>	
<p>Delivering First Homes.</p>	
<p>8. The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):</p> <p>i. Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.</p> <p>ii. Negotiation between a local authority and</p>	<p>Option 2 Negotiation between local authority and developer</p> <p>The concept of using infrastructure levy (combination of s106 and CIL) to provide 25% houses as first homes is elegant. If a further (up to) 25% continues to be delivered to communities as currently with the existing CIL there must be questions asked of what the local authorities (LAs) currently do with the other 75% of CIL. If this is crucial to supporting other infrastructure within their jurisdiction then to have to divert this to first homes might impact on what the 75% is currently used for.</p> <p>However, taking away the possible negotiating between the LA and developer would undoubtedly speed up the process of getting spades in the ground. But, we all realise that developers will currently buy the land and then plead poverty over the number of affordable houses they have to build and try and force the LAs to reduce that number.</p> <p>Is there sufficient demand for the number of first homes generated by this scheme given the economic situation and nervousness of buyers to invest due to the pandemic uncertainty?</p> <p>Locally areas may be desperate not for first homes but more for downsizing for older residents or 1 person properties. One size does not fit all.</p>

<p>developer.</p> <p>iii. Other (please specify)</p>	
<p>9.Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?</p>	<p>Yes</p> <p>Small developments will not have the scope for every sort of housing product so first homes then become the affordable housing. These then need tailoring to the specific needs of the local community e.g. homes for older people, homes for single people, homes for families as required.</p>
<p>10.Are any existing exemptions not required? If not, please set out which exemptions and why.</p>	<p>No.</p> <p>It is important to encourage social-housing, build to rent and first homes building.</p>
<p>11.Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.</p>	<p>Yes.</p> <p>Where landowners have donated for community usage (such as Charrington at Layer Marney in Essex) then they have already lost the original use of the land and have no financial income from the build other than rents, either in perpetuity or for several generations.</p>
<p>12. Do you agree with the proposed approach to transitional arrangements set out above?</p>	<p>Yes.</p> <p>We endorse the transitional plans particularly relating to those NDPs which are well advanced and in place. If we don't accept these transitional plans then early stage NDPs will need to be started again – and therefore given the cost restraints, many won't. see para 57</p> <p>We agree that advanced plans for developments should be permitted to go through to completion without implementing this new planning initiative.</p>
<p>13Do you agree with the proposed approach to different levels of discount?</p>	<p>Yes.</p> <p>The price for any property being sold via a government discount scheme is not set by the developer.</p> <p>At all times, the banks and financiers will have independent surveyors appointed by them (often a company locally known to be conservative) to decide the open market value.</p> <p>When the purchaser starts the mortgage process, no surveyor or company that has previously valued the property are allowed to be used, as this is fraud under the Mortgage Act.</p> <p>The discount specified here is beneficial to the buyer, not the developer.</p>

	<p>The price is fixed anyway and would be selling on the open market. All homes available under government finance schemes are open to all purchasers. However, not all purchasers are eligible to use a scheme to finance their purchase.</p> <p>A discount will be effective in areas with very high values, e.g. London and coastal areas but it would be essential to put in checks and balances to avoid profiteering on behalf of the developers</p>
<p>14. Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?</p>	<p>Yes</p> <p>What is the definition of a “small proportion”? Is it applicable to major conversion schemes on existing high-quality buildings or specific complexes, such as villages for the over sixties?</p> <p>Traditionally, social housing is last to be built on site, as it does not generate enough cash flow to drive the build forward. Site funding is not for 100% of the build. Sites are divided into sub sections and the profit generated then funds the next chunk. By building properties that can be sold under the discount scheme first, it allows the developer to know what the funding is there for the next phase. Financially it makes no difference who buys, as long as someone does.</p> <p>Make the First Homes scheme fundamentally attractive and developers won’t need the ‘sweetener’ of the more lucrative market homes to build.</p>
<p>15. Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?</p>	<p>Yes</p> <p>In some areas this might assist with first time buyers accessing the market if affordable housing is limited</p> <p>Assuming this does not affect rural areas that come under the Rural Exemption sites, but is for areas such as small towns (e.g. Harleston and Attleborough) where demand is so great that all properties on a site could be sold at full market price, or when market devaluation means that the full number of planned properties can no longer be built.</p>
<p>16. Do you agree that the First Homes exception sites policy should not apply in designated rural areas?</p>	<p>Yes</p> <p>We understand that it is protected under the Rural Exclusion policy, Point 64.</p>
<p>Supporting small and medium sized developers.</p>	<p>We have contrary views about support for SMEs because of local experiences. If all this is intended to provide is a protection for SME builders to not go out of business then we have the tail wagging the dog. To offer sweeteners to make their involvement in building out small and medium developments to the detriment of communities just doesn’t feel</p>

right. Examples of SME support already in place are para 71 – deferring CIL payments, para 72 – reduce the burden of contributions on SMEs for more sites for a time limited period and para 95 – SMEs benefit from Home Builders Fund. The economic impact on any business, including SME builders in this country may be relatively short lived but poor planning policy to assist them financially will be felt for generations by the communities.

However, we recognise that at the moment, the bulk of all discounted houses under government schemes are through the major players, the paperwork is hideous and SME may not have the legal staff etc. to deal with it all.

The large players are not interested in small builds – they are uneconomic as too much of infrastructure and middle management is involved. Therefore they will want to ensure all sites are “chunky” cost effective ones.

SME’s do not have the clout of the big players to steam roller the planning system and the bulk are delivering the quick small sites under 20 houses per site.

SME’s cannot sit on land or land bank, thus their sites build out or go back into planning faster.

Local people can have more input into SME builds, as frankly the big players do not even worry about local objections as they are thinking nationally.

Supporting the SME is the only way to keep things local and with local character.

Hopkins Homes (Suffolk), are a very good example of small is beautiful in that they delivered very small sites and they have built a cash reserve that allows them to buy into multiple sites across East Anglia. They are one of the few that were able to keep going during the recession, partly because they were offering a product that has now become normal, and they were not over leveraged. They are a rarity, in twenty years only a handful of new build builders are still in business. As they have been successful, they are now in the middle bracket and are no longer a SME. SME’s need supporting as they are acting as the main employers of tiny subcontractors and independent trades. Due to the CIS scheme, they also act as unofficial tax collectors and the burden of paperwork has increased both in cost and in volume.

SME’s do not have a permanent work forces, it is all done on a contractual basis due to recent tax, pension and workplace requirements.

Without the SME’s the big players will dictate the price of labour and trade – this will not alter their products price!

CIL is going to change regardless of what happens to SME’s – as indicated in the other associated white papers.

<p>17. Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?</p>	<p>No</p> <p>50 properties in one location is a good-sized site and is not small. Local small-scale sites make for more interesting layouts and variation in properties.</p> <p>Para 79 suggests this raising of the threshold would be for 18 months (presumably to stimulate the economy) but the impact will be felt for well beyond that. Will there be a 'cliff edge' after 18 months?</p>
<p>18. What is the appropriate level of small sites threshold? i) Up to 40 homes ii) Up to 50 homes iii) Other (please specify)</p>	<p>i.) 20 homes on one site, or within a linked site. (Linked being 20 houses on one site owned by X, and 20 on the next site owned by Y. Total in the planned development therefore being on or below 20. Thus a 15, a 15 and a 15 linked group of houses that only work due to one section being built could not be approved and delivered all at once.</p>
<p>19. Do you agree with the proposed approach to the site size threshold?</p>	<p>Yes. As a small rural community we advocate small sites for us. Most developments are large, we have to encourage small!</p>
<p>20. Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?</p>	<p>No</p> <p>18 months is too short – it could only apply to already approved works Are we to assume that in 18 months time we will be out of this economic jam? It was at least 5 years before building got really underway again after the crash!</p> <p>How would 'economic recovery' be defined? If this concept of site thresholds is set against economic recovery then this policy could be in place in perpetuity.</p>
<p>21. Do you agree with the proposed approach to minimising threshold effects?</p>	<p>No</p> <p>There is a risk with any threshold change that developers will build out to that threshold and stop the development. Then return at a later stage to take advantage of that threshold allowance a second time rather than build a large site out all at once with an associated financial impact. In other businesses this is known as 'gaming the system' which is no doubt present in the building industry.</p> <p>A site is defined clearly by its infrastructure layouts, for example a Part 1/ Part 2 build. Therefore even though the second part has not gone to detailed planning the inference is that it is there.</p> <p>Therefore the site is to be taken on as a full site not the bit being underway at the moment.</p> <p>If a site does then have a link up later (this is not always a bad thing) then the increased costs will be incurred for the extra profit and CIL.</p>

	If it does not fit the small criteria – tough!
22. Do you agree with the Government's proposed approach to setting thresholds in rural areas?	<p>Yes</p> <p>Agree to the status quo however it would be helpful to have a definition of 'rural'. We are defined currently as hinterland with rural businesses etc. and having just completed a very thorough NDP. Will that remain? In our view it should.</p> <p>Need to maintain the distinction for rural communities.</p> <p>As proved, SMEs are mostly building out these sites and they are most vulnerable to local objections. Therefore a greater proportion of affordable etc do get delivered.</p>
23. Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?	<p>Yes.</p> <p>Support of SME builders should be provided by government in much the same way as for all other sectors of business that are equally being impacted by the economic situation.</p> <p>And a suggestion to be more creative with capitalising on existing opportunity: This is a National problem, not a local problem. The parish is not affected in the way that the inner cities are, and without the same sort of push start that builders had after the war we will not be able to prevent full scale social upheaval. The rural poor live amongst us, their needs are different to urban communities; the urban poor are being sent to live on the end of a railway commute. It is thought that a high proportion of empty and uninhabitable houses are not being brought back into use. There are incentives – 5% VAT on the refurbishment rather than 20%. The capital allowances are claimable if it has been empty for so many years. Grants are available to owners if they let them back to the council for a minimum of years (calculated on a payback time of the grant). WHAT IF? The government paid the cost of the build for the designated properties earmarked for affordable and first homes as they will be paying the discount at the back end. This will release further funds by the builder to get the rest of the development done, thus creating profit and revenue for HMG. The cost of the land will have been covered as part of the site purchase. These properties would come out of the CIL or new system equivalent. These properties would come on stream faster and be assured of delivery. Adherence to rules would be administered by an independent surveyor – they are already visiting site etc and any rule breaking would leave them open to claims against their PPI insurance. Councils not being able to do this would be highlighted quickly that they were not delivering on a Key Homes Delivery Policy.</p>

	<p>Deliver a variation on the alms house principle? Philanthropic buyouts? Allow tax breaks for philanthropic individuals to be able to buy off plan affordable housing that would be put into ring fenced trust companies with accompanying funds to fund perpetuity? Thus paying upfront for a property and releasing funds for the rest of the build and ensuring there are sums available for CIL or equivalent.</p> <p>A modern version of the Cadbury, Peabody etc idea.</p>
<p>Extension of the Permission in Principle (PiP) consent regime.</p>	<p>We are unclear if PiP is considered the same as outline planning. If not will it replace outline planning?</p> <p>Para 89 is of concern. Again there is reference to supporting economic recovery by making it easier for landowners and developers to have certainty of the principal of outline planning by PiP. For us this is of concern:</p> <p>‘This is particularly important for smaller sites which have been allocated in local plans and where there is now, due to the rapidly changing economic circumstances, a desire by landowners to release land for housing’.</p> <p>The concept of simply ‘rubber stamping’ applications doesn’t feel right. The reason that obtaining outline planning (or the current PiP) is a time consuming process is principally because many checks and consultations are needed and secondly because there is a dearth of experienced planning staff. To sweep this away to ‘make the whole process easier to support the economic situation’ is simply wrong. See para 93 second sentence supports this concern. The first sentence does suggest real concerns over the government’s opinion of local planning authorities with the suggestion that they are the cause of delays in planning and should be more proactive. Give them the tools to be proactive rather than change the system to avoid their involvement.</p> <p>We are also concerned that planners do not listen to and take sufficient evidence from outside authorities: heritage and historical bodies, conservancy agencies and environmental experts. Sweeping away cautions to ease these undoubted financial considerations makes it feel as if we now have a massive landowner-developer lobby.</p> <p>We think the PiP should only be granted if a very clear set of detailed criteria is met. Parish councils have a significant role here to ensure this is done at the local level.</p>
<p>24. Do you agree that the new Permission in Principle should remove the restriction</p>	<p>No for rural communities.</p> <p>This appears to apply to urban rather than small rural communities it is not for rural communities or for green belt, agricultural or small-scale</p>

<p>on major development?</p>	<p>sites, nor for any proposed new towns.</p> <p>Is there a definition of major development?</p> <p>As a small rural community we have no large scale redundant industry.</p> <p>It would remove the right for small rural areas to prevent themselves being over developed. This would make a mockery and redundancy of the NDP.</p> <p>Where permitted development has been used due to the formation of a property, shop's floor space has been radically reduced, leaving the rear to be incorporated in living space above shops in varying sized dwellings. In areas that have embraced this, the new living accommodation has proved extremely popular with the end user, the landlord and the government.</p> <p>Business rates are being generated, council tax is being paid on an increasing number of properties, and no extra land has been used to create housing.</p> <p>Smaller dwelling units are being generated, which are proving popular with all age groups.</p>
<p>25. Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.</p>	<p>Yes</p> <p>Agree that commercial floor-space might augment housing development e.g. flats above shops etc.</p> <p>Not just commercial either. What might it take to provide many of these vast housing schemes you see on outskirts of for example, Ipswich, with meeting-places such as cultural opportunities and parks and new schools?</p> <p>Commercial development leads to jobs and community spaces. This is a housing-led development already in action.</p> <p>Old fashioned historical settlements grew around the work. If more work was nearby then we would all be less dependent on cars. Traditionally agricultural labour was close to the workplace</p> <p>With homeworking, people need spaces with communal integration for accessing the internet or just old fashioned speaking to another human being.</p> <p>As part of our NDP communal workspace has been identified as a future project.</p> <p>Families need communal space for doctors, dentists, small shops (not huge ones), early years provision, not to mention sports and social areas</p>
<p>26. Do you agree with our proposal that information requirements for</p>	<p>Yes</p> <p>Para 100 gives a timeframe for granting PiP. Is this really feasible given that it could extend to developments of up to 150 houses. 14 day</p>

<p>Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?</p>	<p>consultation period and 5 weeks to determination?</p> <p>It gives local people time to understand what is going on and to protest if they wish to. The right to object is not being taken away.</p>
<p>27. Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.</p>	<p>Yes.</p> <p>The control of the height of developments has to work with the local community structure – a 3 storey building in the centre of Fressingfield would be overpowering. Even a two storey house with loft conversion and a high pitched roof build close to a small road can be totally inappropriate. It is all about abiding by the historical vernacular and retention of human scale. For example, at the second hearing of a local application there was fury when the height of its high ridge appeared to play no part in granting of permission. Clearly the Government has high-rise in mind when, strangely, all the evidence points to greater well-being, human interaction and community-cohesion being derived from small-scale dwellings.</p> <p>It gives some protection against the modern narrow town house that are getting higher by the year!</p>
<p>28. Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:</p> <p>i. required to publish a notice in a local newspaper?</p> <p>ii. subject to a general requirement to publicise the application or</p> <p>iii. both?</p>	<p>Option iii. Together with social media and direct mailing.</p> <p>Para 108 suggests that local communities should have the opportunity to make representation on major developments that might affect them. What is defined as a ‘major development’ and can the government really be serious on the 14 day consultation process to allow representation to be made? Any proposed development should be actively highlighted to the local community and not rely simply on a newspaper advert in a weekly paper or a sign stuck to a gatepost. We are in the 21 century!</p> <p>Local planning department planning portals should be easily accessible and navigable. Currently they are bewildering to any but the most computer savvy and many applications and appeals are only found by accident. This should not be allowed to happen in this day of transparency and accountability.</p> <p>Applications ought to be relayed to all members of all tiers of local government as a matter of course; in other words, we would automatically get them sent to us, so we can keep an eye on what is happening locally. Forget newspaper and paperwork in the post to those affected, put all on-line with easier processes and room for comment. Not</p>

<p>iv. Disagree</p>	<p>sure what will happen to representative statements on behalf of the wider public at planning meetings? Are representatives to be limited to planners and developers? Where would our collective voice go?</p>
<p>29. Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?</p>	<p>Yes This begs the question, 'what is the purpose of the fees'? If it is to be used as deterrent for applications of PiP, then this needs to be clear and changes to the fee structure are unnecessary. If they are to cover administration costs then this can be easily factored in and can be proportionate to the additional work required for larger developments. Or are the fees simply to generate revenue?</p>
<p>30. What level of flat fee do you consider appropriate, and why?</p>	<p>The fee structure should be based on the work involved for an application and not a pro rata based on hectares. Acreage has no say in how difficult or how much work an applicant or council has had to do, and the better the application, the more the council will have been involved prior to it being sent in.</p>
<p>31. Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.</p>	<p>Yes Any site that could work as a site should go on a register.</p>
<p>32. What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.</p>	<p>Unless the PiP is stringent then flaws will become evident at detailed and technical planning stage. If it is rejected at that point then the fees for PiP will be potentially lost to the developer or landowner and an appeal will almost certainly follow.</p> <p>An appeal within a flawed system will extend the process far more than if it were a better more rigorous and detailed process.</p> <p>A question to probe is about the frequency with which any appeal is eventually granted.</p> <p>If however, rulings were more stringent in the first place then we would not be wringing our hands over lack of reciprocal woodland/ bat boxes and owl roosts etc. 'Conditions' would be one of the major areas of guidance that needed greater clarification and control on all sides.</p> <p>Robust understanding and knowledge of local demand and need at NDP level is required, combined with how to consult constructively with a local community</p>

<p>33. What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?</p>	<ul style="list-style-type: none"> • See response to Q32 <p>Wider considerations of living and working needs. – If towns / city grows then a realisation that outer areas will grow – the neighbourhood development plans should be aligned to only benefit from growth and not to feed individual wants and must be proportionate to the size of the area.</p> <p>Council staff need to acquire a full working knowledge of the area they are serving. Staff need training!</p>
<p>34. To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.</p>	<p>If there is already a Yes in place in principle for a scheme a rough guide to cost ratios can be obtained to see if it is fundable and desirable. However, a wonderful scheme may not actually be achievable within time spans or be able to get funding given that EU funding options will no longer be available</p>
<p>35. In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty?</p>	<p>No Comment</p> <p>This is for Councils to be clear about.</p>