

**Formal response by Foxton Parish Council (Cambridgeshire) to the
government Planning White Paper August 2020**

White Paper published 6th August 2020

1. The overall impression of this white paper is that it amounts to a developers charter to do what they like and this is not a satisfactory way to control planning policy.
2. The white paper seems to want to take away any local control over planning and centralise it. Our voice and that of the villagers will not be listened to.
3. Central government will dictate how many houses are built in each area.
The Local Authority will be told how much housing it must deliver, and Whitehall will say what is a realistic target. More expensive areas will get higher targets (ie us!). No detail of what sanctions could be levied if these targets are not met as yet. The Local Plan must identify housing needs for 10 years. The standard requirement will be to drive land release. The local authority should have the say as to where land is released.
4. Councils will not have to follow the duty to co-operate so high target councils will not find it easy to make deals with neighbouring areas to take over some extra development.
5. If communities don't like the target numbers they can only complain to central government.
6. We are concerned with the proposed zonal planning system and land categorization.
 - a) Firstly, this will make the 5-year housing supply figure will be obsolete.
 - b) We are concerned at the lack of protection against over development with all 3 of the zonal planning categories.
7. Protected Zones are Green Belt/Areas of Outstanding Beauty, Conservation Areas and important Green Spaces. Planning applications will be judged against the National Planning Policy Framework (NPPF) and therefore no local control or input to protecting these areas.
8. Renewal Zones are infill residential areas, town centre development and small sites on the edges of villages. Garden development will be resisted. There will be presumption in favour of development if it is in the Local Plan via either automatic consent if the scheme meets the design codes and prior approval regulations for re-development of the site, via Local Plan or Neighbourhood Plan policies or via other faster planning policies in the Local Plan. Local authorities will decide the density and design for Renewal areas,

and this will be controversial. Call ins by the Secretary of State and appeals will still be the same.

9. Growth Zones are large scale new settlements, urban industrial regeneration, custom and self- build. Developers get AUTOMATIC OUTLINE PLANNING PERMISSION! Final planning permission will come either via Reserved Matters applications, Local Development Order from the local authority or Development Consent Order for large sites. This represents total loss of any local control.

10. Local Plans.

a) Central government want to scale back and streamline how local authorities decide how much housing will be built in their area and where it will go via the Protected, Renewal and Growth parameters. Local plans will be 2/3 shorter with no policies and only core standards and requirements for development.

b) Local plans to be a vehicle for community engagement with planning policies and development. **At the moment residents can comment on planning applications but instead of this, all comments will have to be made at the Local Plan stage!** How on earth will local people cope with that?

c) Local plan 'soundness' test will be removed – updated 'requirements for assessment e.g. environmental. No mention of how this is to be done.

d) Local Plans will have to be made in 2.5 years –not the current average of 7 years. Perhaps a good idea but where do the resource come from to get this work done in such a short timeframe?

e) The National Planning Policy Framework will target climate change, improve energy efficiency and target 'beauty' in design but no mention of how this will be done.

f) Neighbourhood Plans will still be valid, but they will have to reflect the Local Plan more closely.

11. Design Codes.

a) Local authorities will have to decide what they want from transport links to housing design to energy efficiency and everything else! The idea is that good design will drive good quality, but will developers stick to this?

b) Are the local authority design teams capable of such a major factor? Will they drive standards up or down to a minimum? The codes will have to be very specific to avoid conflict over details of designs.

c) National and Model Design codes will carry the danger of 'one size fits all' No mention of sustainability/eco housing/energy efficiency/ linking housing to climate change issues.

d) A 'fast track for beauty' will grant automatic permits for proposals for high quality developments where they reflect 'local character and preferences'. Developments that comply with local design codes would be granted faster planning permissions. 'Pattern books' in the form of style guides for 'popular and replicable designs' could be used for permitted developments and schemes in land designated for renewal but will this mean that all developments look the same throughout the whole country?

12. Developer contributions to affordable housing and infrastructure.

a) S106 and CIL (Community Infrastructure Levy) will be scrapped. A new flat rate Infrastructure Levy will take their place. **This cannot be used to build affordable housing!** It will be based on final development values i.e. a land capture approach. It would be paid on the final value of the scheme once it is fully occupied and there would be sanctions on developers caught preventing occupation to avoid the charge. Much more detail is required to be able to work out if this is better or worse than what we currently have.

b) The Local Authority will determine how the levy is used and it depends who and how land values are assessed. Also the new levy will have to supply infrastructure, schools, healthcare etc etc. Will it be enough? No mention anywhere of the need for rental property.

c) Local Authorities will be able to borrow funds against their Infrastructure Levy revenue to fund projects. There will be a threshold below which Infrastructure Levy is not charged at all. There is a proposal that developers who build affordable homes will be given a discount on the Infrastructure Levy. Once again much more detail needed to make sure that developers cannot get out of the charge by only building a small number of houses.

d) The Infrastructure Levy will be set nationally at either a single or area-specific rate. We would support an area specific rate.

13. Digitalisation.

a) The whole planning system will be digitalised! The vision is that it will be much easier to raise comments and see emerging proposals. This will depend heavily on whether the local authorities have the IT and technologies up to speed!

b) Residents would only be able to see the applications and respond on-line. This totally ignores those people that are not online.

c) Speeding up of planning approval will need new legislation but the aim is that the local authorities and planning inspectorate must get projects through in under 20 months or be sanctioned. Is this actually practical?