

Ministry of Housing, Communities & Local Government

Consultation: Planning for the Future

St Helens Parish Council Response (draft)

The following responses refer to the unique location of the Isle of Wight, which has special requirements in relation to the economy and environment that cannot be catered for within a standard nationally set framework. Furthermore, the White Paper is significantly lacking in detail at this stage and it is extremely concerning that the proposals include fundamental change with limited depth of content.

Pillar One – Planning for Development

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

Secretive, Disengaged, Ineffective.

2(a). Do you get involved with planning decisions in your local area? [Yes / No]

Yes – Local Parish Council.

2(b). If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

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]

Through a variety of well publicised communication channels (multimedia) and formally to Local Councils who can assist with awareness in their area.

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]

Protection of the unique environment and landscape of the Isle of Wight

Provision of Affordable Housing for local people and those residing here in relatively low paid occupations.

Regeneration of Towns

5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

Yes - Local Plans should be simplified, but with greater focus and prioritisation towards local factors and requirements (environment, economy, social factors), with significant local consultation between the Local Authority and Local Councils.

The Local Plan should be the local planning strategy, particularly for special and unique locations such as the Isle of Wight. The Local Plan should form the basis for establishing localised planning requirements, such as housing development needs, including affordable housing (the 'demand'), and the development locations (e.g. priority towards brown field sites) and building capacity (the 'supply'); all based on key local criteria and definitely not based on assumptions stipulated from Central Government.

This requires detailed proactive engagement with Local Town and Parish Councils and Communities, particularly in the development of the landbank definition & classification, which simply does not happen today. The Local Plan needs to relate to local economic and social issues, environmental/landscape factors (e.g. AONB), together with public infrastructure and public service requirements.

Whilst the approach to defining the landbank into generic classifications is welcome, the definitions identified for large scale (growth), small scale(renewal) and protected areas should be refined and set / agreed with the Local Authority, thereby in keeping with their respective local factors and requirements. One set of specific definitions from Central Government cannot fit all areas of the Country.

The classification of the landbank must be consulted and agreed upon between the Local Authority and Local Councils as the public representative of the local community, replacing the Neighbourhood Plan which is totally ignored today!

As a strategy document, once established, the Local Plan should be updated at least every 5 years, taking no longer than 12-18 months to update with proactive community engagement. It should appropriately align to the Local Authority's over-arching Corporate Plan objectives.

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.]

Not Sure – possibly, provided the national development management policies defined are capable of amendment (dispensations granted) between Central Government and Local Authorities to address local factors and requirements. NB. There is a real danger that nationally defined policies will be limited on detail and too generic, leading to fundamental planning issues at a local level, particularly with the proposed planning acceptance by 'presumption in favour', which again, should be discouraged in favour of robust (but timely) consultation.

Neighbourhood Plans are totally ineffective today. Accordingly, it should be incumbent on the Local Authority to engage with Local Councils in establishing the Local Plan for their respective area, albeit within appropriately defined areas, which may combine several Local Councils. This would avoid a subsequent tier of planning criteria which is generally ignored, causing local community angst!

7(a). 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 revised test appears extremely weak in substance.

We do agree that ‘tests’, or rather the assessment for alignment with public infrastructure and services, should be made in the classification of the landbank.

The idea of a reserve bank should not be required, as once the Local Plan is established, then the strategic planning criteria should be clear to Developers upon which to base their development plans.

Furthermore, much time is wasted in the planning system on developments that are approved and then do not commence build. A greater emphasis should be placed on the developer’s commitment to deliverability (not less!), i.e. tangible commitment to build within a specific timeframe if approval granted in line with their requirements.

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

Not Applicable in an Island setting.

Although local cross-boundary (settlement boundaries) issues can be addressed in the preparation of the Local Plan through specific local area consultation.

8(a). 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 – absolutely definitely not! The proposed target mechanism based on a percentage of housing stock has no relevance to the current requirements of the Isle of Wight, with special local requirements influenced by the relatively low economic activity, combined with the existing strain on public services and public infrastructure and unique landscape, including Biosphere and AONB designation. The Island’s primary housing requirement is for growth in affordable homes for local people and employees in low paid roles which, adversely for the Island, it is proposed to relax the requirement to build on developments up to 50 units!

Housing requirements should be set by the Local Authority as a key input to the Local Plan, which sets the housing development demand based on local needs and defines the areas for development (supply) to meet the demand. This needs to include types of housing, e.g. affordable housing, which is the priority for the Isle of Wight.

The White Paper does not address the fundamental Country wide issue on how to meet the demand for affordable housing, which developers (in our experience) are not keen to build due to the economics. The Government must consider funding arrangements to support Local Authorities (in conjunction with Housing Authorities) to build the right types of houses that are required locally. This will significantly support increased housing development of the right houses!

8(b). 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 – not from the basis of setting a Central Government driven target for an area. The White Paper fundamentally lacks content on addressing the economics of anyone building affordable housing (with the exception of utilising the proposed Levy).

The Isle of Wight is desperate for affordable housing, but very few are being built due to the economics. See previous comment on providing greater borrowing capacity to Local Authorities to support investment (in conjunction with housing associations) in the provision of affordable housing – this will create the greater supply of affordable housing than any other policy change highlighted in the White Paper!

However, affordability and urban areas (e.g. brown field sites) will naturally be fundamental inputs for the completion of Local Plans i.e. how can Local Authorities;

- build sufficient and appropriate affordable housing stock for locals?
- prioritise brown field sites to protect the environment / landscape?

9(a). 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.]

No – definitely not. The Local Plan should be a high level planning strategy, with the area development classifications designated to meet local requirements, rather than centrally defined. Once established as a potential substantial development in an area defined for 'growth', then appropriate resources should be assigned in support of the planning process, including the need to gain outline planning consent, with appropriate local consultation.

The proposed National Planning Policy Framework, if introduced, will need aspects for dispensation to address special local area requirements.

NB. Greater emphasis should be placed on deliverability commitments (not less!) post approval, as many materially sized developments consume planning system/process resources with no subsequent build commitment upon approval. Too many Developers are pursuing totally speculative developments!

Priority should be given to assigning resources to address growth area developments, but the planning process should still be adhered to in order for appropriate scrutiny and governance. This revised approach, coupled with the Developers early commitment to deliverability at the outline planning approval phase, would significantly increase the time to build phase from the outset of the planning process.

The planning system, including documentation requirements, can be simplified, but this should not be at the expense of local consultation.

9(b). 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 Local Plan is a high level strategy for planning, with the classified development areas including definitions that address special local requirements, agreed with appropriate local engagement.

Neighbourhood Plans should be scrapped, as they are currently ignored! They should be replaced by proactive engagement and consultation in the preparation of the Local Plan between the Local Authority and Local Councils.

The proposed National Planning Policy Framework, if introduced, will need aspects to be refined with dispensations agreed between Central Government and Local Authorities. as set out and agreed within the Local Plan to address special local area requirements.

There should not be a presumption in favour for developments in the ‘renewal’ classification, as the planning system (including gaining outline planning approval) should be followed in all cases. The planning system, including documentation requirements, can be simplified, but this should not be at the expense of local consultation.

9(c). 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 – subject to in-depth consultation with local stakeholders and with outline planning in principle agreement with the respective Local Authority. Dedicated resources should be established to address significant developments, potentially recovered as part of the cost of the development.

10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]

Yes – the process should be streamlined with stringent timelines. However, this should NOT be at the expense of removing elements of the process (e.g. outline planning permission) or removing proactive consultation, which should be enhanced.

There should be greater emphasis on transparency during the process particularly during consultation phases – the current lack of transparency creates community mistrust in the planning system.

Furthermore, greater commitment on deliverability should be placed on Developers to commence and complete the build phase post approval in an agreed timeline; otherwise financial penalties should be enforced.

11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

Yes – however, much greater emphasis should be placed on local consultation in conjunction with the web-based plans as highlighted in earlier responses.

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.]

Yes – for the initial version of the Local Plan

However, the content of the timeline is drastically limited on local consultation on the Local Plan, which is absolutely essential in order to build greater public trust and support in the planning system. The Local Plan will require significant local engagement, consultation and agreement, e.g. in setting the classification of the landbank and on any specific local planning development management aspects that require dispensation from the National Planning Policy Framework.

Thereafter, the Plan should be updated every five years within a 12-18 month timeframe, considering actual results achieved and addressing material changes in local factors.

The same level of local consultation suggested for local design codes should be incorporated for the completion of the Local Plan.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]

No – provided the Local Plan is proactively consulted and agreed upon between the Local Authority and Local Town and Parish Councils. This may include consultation and assessment within larger boundary areas to address settlement boundary issues.

This would avoid a third tier of planning policy which is costly and currently ignored!

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?

Utilise the development of the Local Plan to include local area planning policy, thereby ensuring proactive local consultation and also the development of defined local planning strategy.

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.]

Consultation should encourage potential partner engagement to endeavour to support significant developments in 'growth' areas, including development of brown field sites.

This should include the potential for Local Authority proactive engagement and involvement as a partner (in addition to local housing associations) within the build 'out of developments', particularly to support affordable and social housing needs.

Pillar Two – Planning for Beautiful and Sustainable Places

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]

The larger developments built on the Island have generally created an urban sprawl, with limited green space and limited car parking capacity. Furthermore, extremely few affordable houses are being built, which is the absolute priority for local people and the community. The current policy which encourages the development of large housing projects (most of which are not required) that stimulate a relatively low volume of affordable housing is fundamentally flawed as a strategy to meet the Island's needs and destructive to the Island. This is what the Local Plan needs to fundamentally address!

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]

Protection of the local environment and landscape (which also supports the economy through tourism) and the building of affordable houses for local people are fundamental strategic planning requirements. The regeneration of our Towns to places people want to visit is also super critical, requiring the redefinition of purpose as favourable places for social gathering post Covid. The Island should also become energy self-sufficient on renewable energy and greater use of public transport should be encouraged.

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.]

Yes – particularly on the level of local consultation.

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.]

Yes

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

20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

No – there shouldn't be a fast track. There is a material risk of abuse of any fast-track approach.

Put in place the economic stimuli to encourage the building of affordable houses, simplify the planning system (including documentation and timetable), make resources available to manage the planning system (ensuring appropriate consultation), ensure deliverability commitments and then more houses (that are actually required) will get built !!!

Pillar Three – Planning for Infrastructure and Connected Places

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

Too often the obligations for affordable housing appear to be removed or reduced. Unfortunately, due to economic reasons, Developers want to build 3,4,5 bedroom houses, which are generally for retirees or second home owners wishing to locate to the Island. However, no provision is made for additional capacity in public services, particularly health care. Whereas the overriding requirement is for affordable housing for local people and those locating to the Island into low income roles, such as tourism or social care.

Concerns are often raised over public services and infrastructure to support planning developments, but it regularly feels as if these fundamental requirements are ignored.

Parking is a material local issue, as most Towns and Villages never envisaged the level of motor vehicles (some probably never even considered their arrival!). New developments are frequently built with limited parking capacity with cars subsequently sprawled across pavement areas.

22(a). 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.]

Not sure, but whatever levy structure is chosen, it should be aligned to local needs (agreed as part of the Local Plan), not a generic national level which simply will not work!

And there should be much greater transparency, consultation and timeliness on the Section 106 obligations, which appear completely opaque with 'behind closed door' discussions going on forever!

22(b). 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]

Locally

22(c). 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.]

It would be too simple to say increase the levy to provide additional funds for local needs, such as affordable housing, public infrastructure etc. Developments need to be considered on a case by case basis within a levy framework set and agreed in the Local Plan for transparency.

However, the Whist Paper needs to go further in consulting with Local Authorities, Housing Associations and Developers on the necessary stimuli to encourage the building of affordable housing. This cannot be left to the private sector alone, as the required level of affordable houses did not get built in recent times, with a relatively buoyant economic scenario pre Covid!

Furthermore, this provides an excellent opportunity for job training and the creation of new jobs to provide the building capacity.

What about utilising Stamp Duty income to support the building of affordable housing?

22(d). 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.]

Yes – although Local Authority borrowing capacity should be further enhanced to support investment in affordable housing developments in conjunction with Housing Associations, Financiers and Developers.

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.]

Yes

24(a). 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 – we need significantly increased levels of affordable housing!

Hence, the comments made earlier regarding the provision of increased lending capacity made available to Local Authorities to support the stimuli of the development priority towards affordable housing developments, including the use of brown field sites and support to the regeneration of our Towns.

24(b). 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.]

Not Sure – a range of options should be considered to encourage the development of affordable housing.

There is a risk that the value of 'in-kind' payments will be misinterpreted and incorrectly valued.

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]

Yes – there are examples of Local Authorities 'branching in to 'non-core' services at terrible economic impact. Particularly, when public finances are so stretched to provide the fundamental basic public social services.

However, consideration should be given to the 'housing entity' potentially involving the Local Authority (as an investor or at least as a borrowing guarantor) with Housing Associations, Financiers and Developers, to establish finance vehicles for the development and build of affordable housing, either as part of a larger development or as a focussed affordable housing development.

24(d). 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.]

Housing quality requirements (particularly minimum standards) should be set in the National Planning Policy Framework as amended for local requirements and agreed within the Local Plan.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

No – it must be linked to the planning strategy as set and agreed in the Local Plan. Local Authorities are under immense financial pressure so the danger is the Levy will be redirected and used to fund priority social services.

25(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

Yes – The affordable housing requirements should be established in the Local Plan.

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