

# Consultation on Proposed Changes to Current Planning System: Response by St Helens Parish Council (draft)

## Notes:

1. Proposed revisions to IWALC highlighted in blue.
2. NALC questions are reproduced in faint type.

## Topic 1: Changes to method of calculating housing need

We **strongly** disagree with the proposed new method of calculating housing numbers.

It would significantly increase housing targets on the Isle of Wight. The estimated number for the Island is 1,045 a year, which is 55% higher than the number required in the current local plan (668) and three times the average delivery over the last three years (348). This level of expansion would mean more building on greenfield sites, which would in turn further damage the Island's environment and attraction as a tourist destination and reduce agricultural land and thus self-sufficiency. It would also increase the pressure on already stretched infrastructure and services, including roads, schools and health and social services.

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. The Island's primary housing requirement is for affordable homes which, adversely for the Island, it is proposed to relax the requirement to build on developments up to 50 units!

Moreover, such targets are unrealistic. We cannot deliver our existing targets, due to a number of factors, including viability for developers and insufficient skilled construction workers on the Island, particularly in the short term.

We support our MP's efforts to reduce the targets and his argument that the island should be regarded as a special case. The Island has large areas of outstanding natural beauty (AONB) and has recently been declared a Biosphere Reserve. The basic and fundamental fact that we are a physical island surrounded by a fragile coastline, with no fixed link to the mainland, gives rise to many issues which are simply not recognised or addressed, nor have they ever been. A revision of the rules gives an opportunity for this fact to be formally and properly taken account of. At a basic level the fact we are an island increases vulnerability to overdevelopment and, as such, the proposals would work in an almost entirely negative way for the Isle of Wight.

The Isle of Wight is not the only local authority that would be adversely affected. The changes would result in significant anomalies between local authorities, with reductions in targets for many cities and increases in areas like the Isle of Wight, where additional housing would have the most negative impact on the economy, public services and the natural environment.

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 in each local authority area OR the latest household projections averaged over a 10 - year period?

1. No

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

2. No - There needs to be more local stock. Attention needs to be given to understanding local need and what is affordable for local people. More weight should be added to the local homes policy [and the planning for affordable housing requirements](#).

Do you agree that using the workplace - 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.

3. No – Isle of Wight house prices should reflect earnings on the Isle of Wight. [The valuation of housing on the Island is materially impacted by the retirement sector and also second home buyer market. The concept of affordability should relate to what those needing to purchase property can afford in each local area.](#)

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.

4. No – Affordability has not improved. Wages have not kept up with house prices – the gap has increased.

5. Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

5. No – Consideration has not been given to the low earning areas, including the Isle of Wight, where there is a high proportion of low paid seasonal workers, and due to an ageing demographic, a large number of people working as carers in a low paid care industry. [In determining affordability regard needs to be had to specific local considerations. As noted above the issues are exacerbated on an island.](#)

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:

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?

**6.Yes – Authorities need to be given time to properly assess the implications of the proposed changes and have time to agree special factors that impact their area. They also need to be given time to re-assess their respective housing and development strategies in the light of the long term impact of the Covid pandemic, such as High Street regeneration.**

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?

**7.Yes - Authorities need to be given time to properly assess the implications of the proposed changes and have time to agree special factors that impact their area. They also need to be given time to re-assess their respective housing and development strategies in the light of the long term impact of the Covid pandemic, such as High Street regeneration.**

## **Topic 2: Delivering first homes**

Securing of First Homes, sold at a discount to market price for first time buyers, including key workers, through developer contributions in the short term until the transition to a new system: The council would support schemes designed to help parishioners and young people moving into first homes.

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):

i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.

ii) Negotiation between a local authority and developer.

iii) Other (please specify)

8. We think that the mix of tenures provided in affordable housing should be determined in accordance with local plan policy (option 1), rather than through negotiation between the local authority and individual developers.

Local Authorities should be able to set targets for affordable housing requirements (including first time buyers) and also social housing targets commensurate with their local needs. Central Government need to support the provision of financial arrangements to support Local Authorities in delivering on their respective targets, such as the provision of Local Authority financial borrowing arrangements.

Local Authorities should proactively engage with local Town and Parish Councils on planning strategies in their specific areas and enable Town and Parish Councils to contribute to the Housing Needs List through the prioritisation of local people. This includes remaining minded of Settlement Boundaries which are at risk of being significantly diluted and the creation of urban sprawls.

Overall, a far greater role should be given to Town and Parish Councils. Again, this relates to the need to have regard to specific local circumstances. This consideration is particularly relevant to the Isle of Wight which is completely emparished.

With regards to current exemptions from delivery of affordable home ownership products: 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?

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**9. Yes**

10. Are any existing exemptions not required? If not, please set out which exemptions and why.

**10. Yes**

11. Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.

**11. Yes – Every development should be considered on its own merits, and exemptions applied if needed.**

12. Do you agree with the proposed approach to transitional arrangements set out above?

12. No – the waiving of affordable housing targets on developments below 40-50 units to encourage SME building is totally inappropriate in an area such as the Island where the primary demand requirement is for affordable housing.

13. Do you agree with the proposed approach to different levels of discount?

13. No – The quantity and market value / discounts applied for both affordable and first time housing should be based on local needs as defined in the respective local planning strategies. Caveats need to be in place to prevent short to mid term material gain, potentially through some form of clawback arrangement.

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?

14. Yes – provided this is not detrimental to meeting the affordable and first time housing requirement targets and should only occur if and once these targets are met.

15.

Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?

15. No

16. Do you agree that the First Homes exception sites policy should not apply in designated rural areas?

16. No – we need rural homes, there should be no exceptions

### **Topic 3: Supporting small and medium sized developers**

17.

Do you agree with the proposed approach to raise the small sites threshold for a time - limited period?

17. We disagree with the proposal that the threshold for delivering affordable housing should be raised to exempt developments of up to 40 or 50 homes. Our main need on the Island is for affordable homes and, in particular, social (rented) housing. This proposal would result in an increase in homes that could have a negative impact on the environment without the compensation of any affordable housing. This will almost certainly result in a reduction in the much needed supply of affordable/social housing. It will lead to a further influx of those retiring to the Island or purchasing second homes, without the balance of housing for young people and families who constitute the bulk of the workforce, especially with the historic low-wage economy. There is a material imbalance in the population age range without exacerbating it further, with public infrastructure and services under significant strain. The impact on rural areas, which make up the vast majority of the island, will be particularly adverse.

18. What is the appropriate level of small sites threshold? i) Up to 40 homes ii) Up to 50 homes iii) Other (please specify)

18 This should refer to the Neighbourhood Plan, [where such exists](#), which reflects local need and has been consulted on with the public. [In other areas on the Island no threshold should be set until studies equivalent to those in such plans have been undertaken and published.](#)

19. Do you agree with the proposed approach to the site size threshold?

19. No

20. Do you agree with linking the time - limited period to economic recovery and raising the threshold for an initial period of 18 months?

20. No

21. Do you agree with the proposed approach to minimising threshold effects?

21. No – Consideration needs to be given to the infrastructure [and public services.](#)

22.

Do you agree with the Government's proposed approach to setting thresholds in rural areas?

22. No

23. Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?

23. Yes – offer incentives, support local employment.

[Enable Local Authorities to support funding of affordable housing through proactive engagement in development schemes through increased borrowing requirements and greater flexibility to partner the private sector in affordable and social housing schemes.](#)

#### **Topic 4: Extending 'permission in principle' scheme**

24. Do you agree that the new Permission in Principle should remove the restriction on major development?

24. No – developments need proper scrutiny and consultation. Greater stipulation should be made on the timeliness of development construction post approval. Too many developments consume planning resources in the approvals process with no subsequent build commitment post approval.

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.

**25. No – we need commercial development to support the community. Further consideration required towards the development of ‘mobile’ home parks, particularly the development of existing sites.**

Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

**26. No – it needs to address the infrastructure and also requirements on public services**

27. Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.

**27. Yes. Regard must be had to the environment, in particular where local designations such as AONB and Biosphere are in place due to the quality of views and the natural environment.**

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: i) required to publish a notice in a local newspaper? ii) subject to a general requirement to publicise the application or iii) both? iv) Disagree

**28 Yes – the larger the development the more it should be publicised, using social media and other mechanisms to ensure that it gets out to a wide audience as possible. There should be engagement with the respective local Town or Parish Council which should be guided to support the awareness with the local community. Publication in a local newspaper alone will often fail to provide sufficient notice of developments so wider measures need to be employed.**

29.

Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?

**29. No – a small development can't charge a flat fee – different structures for different developers.**

30. What level of flat fee do you consider appropriate, and why?

**30. We do not consider any is appropriate.**

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.

**31. Yes**

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.

**32 Consider public opinion, local plans, neighbourhood plan, local needs and infrastructure and public services. Where Town and Parish Councils have not created a formal Neighbourhood Plan, there should be regard to whatever documents and plans they have created. Often there will be resource issues which limit what such bodies can produce so they should not be prejudiced in such circumstances.**

33.

What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?

**33. There is a material risk of greater public mistrust in the planning system due to the reduced level of awareness and scrutiny. Couple this with fewer people being involved in the process will inevitably culminate in a greater risk of malfeasance and corruption. Public perceptions of mistrust in the planning system already exist and further changes, such as those proposed, will significantly increase the problem. Accordingly, the system should aim to improve local engagement rather than undermine it. Greater engagement will give greater chances of the actual local need being met.**

**In summary, the changes proposed will be a social, economic and environmental disaster for the Isle of Wight.**

34. To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.

**34 This needs to be directed at local small and medium sized businesses, and developers to get their views**

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?

**35 No – Everyone should have equal opportunity**

