

Abbreviations

NPPF	National Planning Policy Framework
CPC	Compton Parish Council
GBC	Guildford Borough Council
OAN	Objectively Assessed Need
SHMA	Strategic Housing Market Assessment
CPRE	Campaign for the protection of Rural England
LA	Local Authority
SCC	Surrey County Council
PDL	Permitted Development Land
LNRS	Local Nature Recovery Strategy

NPPF Consultation Response

Compton Parish Council – Guildford - Surrey

Chapter 1 Introduction

Compton Parish Council supports some of the policies when seen in isolation but has real concerns about them when viewed as a whole, and the consequences of non-delivery.

The market remains developer led but with the provision of 50% affordable alongside the infrastructure and the desire for 'quality' housing, it is highly likely that developers will simply hold off building. Unless the buffers for non-delivery are removed, councils will be forced to find more land and the result could be an ever-increasing number of unbuilt consents (land banking).

Benchmarking land / setting pre-defined price bands, could work for land bought through CPO to some degree but only for council owned social housing. It would not be in developers interests to pull the rug from its own market or compete with itself elsewhere. Developers could use it to obtain land at a lower value and then wait for hope value to return. In essence, unless CPO were used, landowners are unlikely to sell without hope value.

Removal of 'right to buy' alongside an increase in authority-built housing would provide housing for those most in need.

Whilst it is understandable to include infrastructure connected to new builds as part of the build, the impact of new builds on surrounding infrastructure should also be considered when granting approval.

National authorities such as Highways, DEFRA and National England need to be able to comment on the accumulative impact as well as any specific development.

Compton Parish Council understands that Guildford Borough Council is not only meeting its housing targets but that, based on the previous standard method of calculation, exceeded the need (as identified by the OAN and SHMA).

The percentage uplift based on population size rewards areas that did not build and punishes areas that accepted growth. This rather fundamental method to establish uplift should be balanced alongside other factors and constraints. It should be advisory and not mandatory as proposed.

Uplifts are also added for affordability and apply to areas where housing is 4 x the annual salary. This equation is too low and will apply to almost everywhere. Without reducing the demand for housing from investors and second homeowners alongside the need for rental accommodation and those with alternative living arrangements, simply building more market-priced homes will not improve affordability, but will increase the number of empty homes.

2014 housing projections are outdated. They predate Brexit and the pandemic and changes to the way in which people work and live. If radical updates are to be made to the NPPF, as proposed, they cannot be based on figures that are ten years old.

The following statement raises a lot of questions. *'The new method aims to provide greater clarity on the starting point and to shift the focus of debate away from the "numbers" question and towards the "how" and "where" of building new homes.'*

The numbers should be in line with the need in any given area, and that need will include growth. To ignore the numbers and where they come from results in a 'build and they will come' mentality, which is unsustainable. The how and the where should follow but the numbers are crucial and should be advisory, not mandatory.

Definitions of brownfield, grey belt, and sustainability should not be open to debate by those with the deepest pockets. They need to be clearly defined. All new structures, whether homes, businesses, or services, should be built with solar panels or renewable energy alternatives.

CPC supports safeguards to ensure that poor quality housing does not result in areas where the 'presumption in favour' exists. Presumption in favour should not exist in protected areas, such as National Landscapes, SSIs, and greenbelts.

Chapter 2 Policy Objectives

We believe that a realistic, evidence based starting point is essential to policy success.

Some of the statements appear to be incorrect and some are not evidence based.

The evidence, if there is any, to support the need for 1.5m new homes should be clear along with policies to ensure the 1m plus outstanding planning permissions are built and efforts to address over quarter of a million long term empty homes are made.

Speed appears to be the driving force behind policy formation, and it is unclear why speed is of the essence when the number of planning permissions given over the last few years exceed the industry's ability to build?

It is difficult to understand how the three pillars, *stability, investment and reform* sit alongside one another, as the tone of the proposed changes suggests uncompromising levels of change whilst simultaneously supporting stability?

The directive is overly prescriptive, giving a lot of 'stick' and very little carrot. The Localism Act of 2011 has been reversed in all but name, with policies proposed that direct blanket housing and commercial targets for Local Authorities irrespective of whether they are in line with local evidence-based analysis. This is not something we would support.

Chapter 3 – Planning for the homes we need

1 Do you agree that we should reverse the December 2023 changes made to paragraph 61?

No

The presumption in favour of sustainable development along with exceptional circumstances needed for development on protected landscape, have resulted in many court cases based around the interpretation of the terminology. Both lead to circular arguments, where unsustainable development (without supporting infrastructure that would result in increased traffic) has been permitted on the basis that the need for housing supersedes sustainability. Likewise, large planning applications such as Blackwell Farm near Guildford were permitted for similar reasons. The 'need' for housing trumped the need for exceptional circumstances even though the authority had met targets and had set a new target including greenbelt that far exceeded the target set.

The focus on speed and targets without clear evidence as to their origin, alongside a presumption in favour, is likely to result in further land banking and the permanent loss of some of our most valued land. It also does nothing to encourage the regeneration of brownfield land.

Question 2

Comment

The principals underpinning the need for change are highly questionable. Build out levels are outside the control of planning authorities, who merely give approval. Developers will not build if conditions are unfavourable, if profits are not optimal, if the targets exceed their bandwidth in terms of builders and supplies. Likewise, watering down protection of greenbelt land will do nothing to encourage a brownfield first approach.

Policies to increase levels of affordable housing are agreeable in principal but in practice are likely to result in land banking and delays, as has already been seen by Barratts who have shelved four large developments stating that 50% affordable housing is unviable.

We support high levels of affordable housing but buffers for non delivery should be removed as build out rates are outside the council's authority. Levels should be higher on greenbelt land than brownfield, to encourage a brownfield first approach.

It is disheartening to see that government has not taken this opportunity to directly address the lack of affordable housing by building it.

Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

No

The standard method if used should not be based on 2014 ONS data. This pre-dates Brexit and changes in work practices as a result of the pandemic and the continued use of these out-of-date figures offers no reassurance that the targets set are in any way realistic or achievable.

Flexibility needs to account for local constraints and community needs. Currently consultations involve the community but then override their views. The use of the term 'NIMBY' for those who disagree with government trajectory, sets the wrong tone for what is supposed to be a reasonable and balanced exercise. Whilst the term is not used in the formal document it is used by senior ministers when discussing planning.

Areas across Britain vary enormously in both their make-up and desired levels of growth. Imposed growth without evidence of real need is unlikely to ever be supported. A one method suits all approach did not work before the changes and will not work if reverted to again.

Where urban uplift has been difficult to implement due to strength of opinion from residents (urban areas having a higher concentration of voters) or negative impact on character, extension of 'urban boundaries' has solved the problem for planners aiming to meet targets. This is in direct opposition to one of the core purposes of the greenbelt, that is, to prevent urban sprawl.

The need to work with neighbouring authorities as a means of providing a regional growth strategy is sensible but this should not be based on speed but on strategy. It makes no sense for the authority who completes their Local Plan last to be given unmet housing need from the remaining authorities as this often remains unmet.

3 Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

No

Infrastructure is largely based in towns and cities and brownfield registers show significant opportunities for regeneration in areas where infrastructure already exists, that being in urban areas. Policy should ensure that brownfield first is adhered to. Appropriate levels of infrastructure must accompany new growth and be installed ahead or alongside it.

4 Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

Authorities' ability to influence style / character is limited and terms such as 'high quality' are open to interpretation. Whilst agreeing that increasing density in urban areas where density is low, is needed to accommodate growth in the right places, this should not result in urban areas losing their character.

It is possible to build characterful, higher density housing and authorities should have the ability to refuse designs that do not meet local requirements. Authorities should not have to accept poor design in order to meet targets that have been forced upon them.

5 Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes

Spatial visions should however be consulted on and large new communities must not be built without supporting infrastructure. A full accumulative impact assessment should also accompany new development to ensure that it does not adversely affect existing communities.

6 Do you agree that the presumption in favour of sustainable development should be amended as proposed?

No

Please explain your answer:

It was amended because it led to unplanned sprawl and favoured development over strategic planning. The presumption in favour of development is simply a developers' charter. It is certainly not sustainable.

The new methodology and top down targets have reduced development in London and pushed it out into surrounding towns and cities (most of which are in greenbelt). Little weight has been given to the need to retain much needed agricultural land and our beautiful landscape. The use of percentage growth increase based on existing population figures, punishes towns that previously adopted a high growth plan and favours those that didn't. Broad brush strokes seldom work strategically, and flexibility must be incorporated.

The need for affordable development is key in many areas and in some more than others, This needs addressing directly. If presumption in favour is granted it should only be geared towards affordable housing delivery.

Permitting local authorities, the power to buy land allocated for large developments might also ensure a greater delivery of low cost/social housing, as was suggested in the 2018 report by Sir Oliver Letwin. Using CPO for affordable housing is unlikely to work in Guildford or Surrey on greenfield sites because those who are on low or even average incomes could never afford property even if it were discounted.

7 Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

No

The current focus on meeting targets results in inappropriate development. Authorities can only grant permission, they do not build the houses and, using the stick and carrot analogy, whilst there are plenty of sticks applied if local authorities do not present a 5 year rolling plan, there are none for developers when they do not build.

It is in the developers interests to hold out on building as this creates a greater need by the authority to fulfil the targets, which results in approving development that might otherwise not be approved. If a rolling target is set, it must follow suit that developers lose the approval automatically if they do not build within an agreed time frame.

8 Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Yes

Buffers used as punishment for not meeting targets are harmful to the planning system, particularly when shortfalls are beyond the control of the authority. The presence of buffers leads to land banking ie. Developers do not build, targets are not met, buffers are increased and Authorities have to seek more land to meet the 5 year supply.

9 Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

No

Developers will never build more than they can sell. Adding any form of buffer, results in land banking and this could reduce the buildout rate even further if developers are leading the planning process.

10 If Yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

Not answered

11 Do you agree with the removal of policy on Annual Position Statements?

N/A

12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

At a top line level to ensure adequate infrastructure, but not to enable a game of 'first past the post' for housing targets, with unmet need being passed around from area to area.

13 Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Yes

For plans and large-scale plans, to be considered sound they must be evidence based and this should include ALL the evidence. In Guildford evidence was omitted and this is apparently OK, as it is currently up to the authority to decide what to include and exclude. If independent surveys are submitted as evidence (by Parish Councils or other recognised organisations) they do not have to be considered alongside the main body of evidence. It seems that evidence is based on what is included and not excluded. This is clearly wrong and needs addressing.

14 Do you have any other suggestions relating to the proposals in this chapter?

Government needs to do more than issue targets and it needs to move away from the simple supply and demand theory that building more houses than are needed will decrease prices. This is because developers control the market, and they will never build more than are needed at any given time. Relying on developers to build infrastructure and affordable housing is the reason that they control the system. Buying land and building infrastructure / affordable housing would alter the balance of control and help to reduce prices from the bottom upwards. There are many factors at play that affect prices and the ability to pay, and stability of the market are amongst them. There is a very clear need for truly 'affordable' housing with the small percentage reduction remaining in perpetuity. The discount should be less in brownfield areas to incentivise a brownfield first approach.

Policies suggested are in line with providing a never-ending demand for housing, allowing them to be built as investments and second homes. Building ad infinitum is what has led to the problems we face today. Moving development away from London to the suburbs because London is saturated, does not deal with the problem, it feeds the problem.

Home ownership is only one branch of planning, and a great deal more needs to be done to create quality homes / retirement villages which would create some movement in the market. Likewise, consideration of policies that impact the rental market would help those needing rental accommodation and improve mobility of the work force.

Use of 2014 data is a major flaw in any attempts to improve the system.

Real evidence must be used every step of the way. The 'housing crisis' is often interpreted as a general housing shortage but the 'crisis' is multifactorial, and many aspects will not be solved by just building more expensive, low density, executive homes here, there and everywhere.

Expanding the criteria for mortgages and reducing the cost of selling a property will help create a more mobile work force.

Chapter 4 – A new Standard Method for assessing housing needs

15 Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No The housing stock method rewards authorities that refused past growth and punishes authorities that accepted it. The multiplier is too high as it results in a figure that exceeds ONS projections and there is no clear evidence to support the new method, other than a pre-determined figure of 1.5m need.

Some areas have less growth plans than others for good reasons (decline in local industry/jobs, impact of automation etc.), and others have more positive growth plans. The level of growth is not always in the hands of local authorities, it can be driven by national infrastructure plans, university success, proximity to places of employment etc.

In rural areas, where villages have low housing stock they are grouped together in districts at planning level. This can then result in very large developments that completely alter the size of a small area.

16 Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3-year period for which data is available to adjust the standard method's baseline, is appropriate?

If this question refers to the degree of uplift added for affordability, then no. When the bank of England increased interest rates, prices came down. When stamp duty was lifted, the demand increased, and prices went up. As has been said before, there are several factors that affect ability to pay.

One would expect land to be cheaper in areas where housing is cheaper, and salaries are less. Affordable housing based on a percentage of the market rate already exists.

17 Do you agree that affordability is given an appropriate weighting within the proposed standard method?

N/A Has building more houses in London brought the price down? No. It is a red herring that simply feeds demand rather than fulfilling need, especially when the demand is endless. Policies to reduce demand however might help. These need to be aimed at investor portfolios.

18 Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

No

Policies to date have adversely affected landlords, many have sold, and this has in turn caused a shortage of rental accommodation. Policies must be aligned and allow for adequate supplies of decent rental property where the rights of both landlord and tenant are respected in equal measure. The criteria for inclusion on a housing list should be reviewed and regularly updated and closely monitored to be a useful tool for measuring need. As it stands it is of minimal value.

19 Do you have any additional comments on the proposed method for assessing housing needs?

Please provide any additional comments on the proposed method for assessing housing needs.:

Remove the buffers they artificially inflate plans above and beyond what is needed and result in land banking. Separate need from demand and use up to date figures, not 2014 baseline projections.

Overreaching creates an environment where targets can never be achieved, and the result is failure.

Chapter 5 – Brownfield, grey belt and the Green Belt

20 Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Agree that local authorities should keep a comprehensive, publicly available, brownfield register. The register should include all council owned PDL and should give reasons why land has or hasn't been put forward for development. Council owned land that is 'not available' or 'unsuitable' should state why. It must be clear that brownfield sites have been thoroughly investigated for inclusion and built out before encroaching on agricultural/ greenbelt land.

Brownfield land must be developed first. This will not happen whilst councils have impossible targets and developers have banked consents elsewhere.

Brownfield sites within greenbelt are PDL in the eyes of most planning authorities and are already included in many authorities' plans. Including land that is not PDL but a bit scruffy or not strongly in line with the 5 principals of greenbelt and calling it grey belt, is stretching the boundaries and is totally subjective. The countryside is not a park, some areas are a bit scruffy. Areas of scrub can exist for very good reasons, as a home for wildlife and to protect trees, ponds etc from members of the public.

Grey belt under the proposed new policy can be created by sheer negligence and bad planning. Creating it so that government can quickly meet targets is destructive. Grading Greenbelt is again subjective. Rather than removing Greenbelt that is not performing its functions well, perhaps constraints should be applied to protect and enable it? With a quarter of a million long term vacant houses (700,000 if all empty houses are included) and 1 million outstanding unbuilt planning consents, the attack on the Greenbelt seems unjustified.

If Greenbelt does not perform any of the criteria set (and this assessment must be carried out by an independent body) then reassessment would seem fair. However, if it performs one area

particularly strongly, then it is fulfilling a purpose. Once removed or developed, it can NEVER be replaced and decisions concerning its longevity should not be taken lightly or for political reasons.

124c does not exist in the NPPF document

21 Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Greenbelt?

NO.

Please explain your answer:

Special circumstances permit development on Greenbelt, but definition is needed. If housing need is defined as a special circumstance, then by default, the NPPF is meaningless.

If an authority has a target they cannot meet, they incur a buffer which only increases the chances of failure. Such authorities can then be made to use Greenbelt land for development. This is development by stealth. It would permit development in inappropriate areas to meet a need that includes unsustainable growth. This policy is not strategic or even realistic.

Where PDL exists within Greenbelt, development should remain on the PDL and not encroach beyond it. Where PDL was issued as a temporary measure, it should be revoked after the period has expired, otherwise temporary development will always be refused fearing the long-term possibility that the land will be reclassified. The sustainability of a development can once again be overridden by the greater housing need because the definition is open to interpretation. Wisley is an example of this (and the temporary PDL factor) and results in development within Greenbelt but in an unsustainable location. Previously it had been refused because it does not meet sustainability criteria and then approved, to meet targets.

Planning guidance should include reference to a height limit on development (such as warehousing, for example) which may not be consistent with the local landscape character assessment.

22 Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Re classifying some PDL as temporary PDL would garner greater support for projects that support farming/ environment providing the classification does not lead to reclassification. Any hard landscape can warrant an area as PDL, which makes little sense.

23 Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

No

There is no need for a third definition. This is simply a way of releasing Greenbelt for development purposes and would result in erosion of the Greenbelt over time. As with many aspects of planning, what is and isn't grey belt is very much open to interpretation. In Guildford we have seen

developer's surveyors refer to lack of openness to justify planning applications and on investigation the 'structures' reducing openness were in fact, trees.

The NPPF should also make it clear that ALL evidence be included when making planning decisions, especially for large applications. Presently council/developer evidence is submitted with the application, but other independent evidence commissioned by Parish Councils/ others, is not. When an assessment is considering 'quality' as a measure, it cannot be fairly assessed by parties who will profit from a 'poor quality' status being given. If grey belt becomes policy, then the assessment must be carried out by a body that is truly independent.

Land that prevents coalescence maybe small and 'only just' fulfilling its role. It is vital that such land remains and is not weakened by this policy. Food security is also a serious issue for the UK and agricultural land of any quality should be retained.

Councils already have the power to approve development on greenbelt as part of the plan process and in Guildford's case, did so even when targets were met and exceeded.

The greenbelt is there for a purpose, and it should be upheld not weakened. If Greenbelt does not perform any of the criteria set (and this assessment must be carried out by an independent body) then reassessment would seem fair. However, if it performs one area particularly strongly, then it is fulfilling a purpose. Once removed or developed, it can NEVER be replaced and decisions concerning its longevity should not be taken lightly or for political reasons.

Question 25

Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

YES – If this policy is included, additional guidance is needed. It is however also important to include surveys other than those produced by developers, to get an all-round view.

We would however prefer not to see this definition included at all.

If Greenbelt does not perform any of the criteria set (and this assessment must be carried out by an independent body) then reassessment would seem fair. However, if it performs one area particularly strongly, then it is fulfilling a purpose. Once removed or developed, it can NEVER be replaced and decisions concerning its longevity should not be taken lightly or for political reasons.

Question 26

Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Greenbelt should not have to strongly fulfil all five criteria. If it serves some, it is fulfilling an important role.

Question 27

Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

LNRS's should be given maximum support and protection. This policy should include urban greenspaces and undesignated countryside.

28 Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

No

Please explain your answer:

The sequential test must be part of the NPPF and followed. Brownfield / PDL will never be regenerated whilst developers have a choice between that or finding Greenbelt that might be reclassified for the purposes of development and profit.

Urban densities and sustainable transport measures should be addressed first before urban sprawl is permitted.

Accumulative impact must also be included. As it is, developers must provide infrastructure to enable their development, but large developments can and often do, make the difference between a junction beyond it, working or not. The accumulative impact on water/sewage systems, schools, hospitals, medical centres etc. should all be accounted for by the council responsible for approving the application, with funds made available by the developers. The NPPF needs to ensure this happens.

The accumulative impact should include impact on the environment. All new development should include renewable energy sources as part of their build, on site.

Policies relating to Achieving Appropriate Densities criteria on Brownfield sites, have not been strengthened.

29 Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes

Please explain your answer:

The term "across the area of the plan as a whole" must not undermine the function of the local Green Belt between boroughs or the strategic Green Belt surrounding a region.

31 Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Yes

Authorities must show evidence of optimal levels of Brownfield development by increased densities first.

There should be an 'infrastructure first' policy. The Brownfield register should offer greater detail and include brownfield land that is not fulfilling a function but has not been put forward so that LA's can see which has been voluntarily added for development and whether any is outstanding that might come forward in the future.

32 Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

The sequential test should apply to all. Development including traveller sites should begin with a fully evidenced brownfield first approach.

33 Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

Yes

The purposes of Greenbelt would be undermined by development of any nature, including traveller sites.

Question 34

Do you agree with our proposed approach to the affordable housing tenure mix?

Question 35

Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

Yes

There must be an incentive for developers to look towards brownfield / PDL before developing Greenbelt land (in whatever format) and a compulsory, non-negotiable, 50% affordable housing scheme on Greenbelt would probably do that.

The issue with relying on developers for affordable housing (rather than councils providing it) is that they will always argue that the agreed percentage isn't viable after infrastructure has been included or they may postpone the project (as has happened with Barratt). There is also the question of appropriate infrastructure versus cutting corners, if it is developer led.

Greenbelt properties (including brownfield within greenbelt) are amongst the most expensive on offer. Applying a higher target on Greenbelt might help developers focus on Brownfield sites, if the target for Brownfield is lower.

We would prefer to see government building social housing and infrastructure and having complete control over the volume built. If, however, the developer led system is to continue, then policies must encourage a Brownfield first approach and remove the viability clause where an agreement has been reached.

In the event of a site not being built out, the removal of planning permission might help focus attention on delivery and put an end to land banking.

Biodiversity net gain is rather like sustainability, a term that is attached to proposals as a given with little real evidence to back it up.

Designs should include existing mature trees rather than remove them, where at all possible. Net gain should not assess the future biodiversity gain as if it is present today. It can take 30 years or more to recreate which is why it is preferable to keep green areas rather than try to replace them.

It is a step in the right direction to include a maintenance plan for new planting.

37 Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

Probably not.

Including grey belt for development will automatically increase 'hope' value and the value thereof. Attempts to manage the market have in the past failed. Landowners may simply choose not to sell if they feel the benchmarks are not favourable.

We agree that the principal of this may cancel out debate over viability, but the reality is that whilst the system is developer led any measures to change market dynamics are stymied.

The lack of constraints applied around Greenbelt only increases 'hope value' and this could be changed by strengthening protection.

Further details are needed as to the criteria used when benchmarking to make a judgement. The repercussions also need to be thoroughly thought through.

Question 38

How and at what level should Government set benchmark land values?

As for Q 37

Including grey belt for development will automatically increase 'hope' value and the value thereof. Attempts to manage the market have in the past failed. Landowners may simply choose not to sell if they feel the benchmarks are not favourable.

We agree that the principal of this may cancel out debate over viability, but the reality is that whilst the system is developer led any measures to change market dynamics are stymied.

The lack of constraints applied around Greenbelt only increases 'hope value' and this could be changed by strengthening protection.

Further details are needed as to the criteria used when benchmarking.

Question 39

To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

The level of affordable housing should be as high as possible, but it must be possible. Viability should not be undertaken by the companies or by companies with a vested interest, but by independent companies, commissioned by councils with costs covered by developers. This should be part of the planning consent costs. This information should be publicly available and open to scrutiny. If land is benchmarked or available through CPO, the maximum level of affordability must be given (50% for Greenfield) and negotiation over viability removed.

There must be very strict caveats around the suitability of land. Where costs for major infrastructure is required that might reduce the amount of affordable housing offered, the site would not be viable and should not go ahead.

40 It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

All development should be policy compliant and contribute accordingly.

41 Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

NO

Good planning should mean no surprises and each development should be fully costed. Late-stage negotiations can be used as a way of omitting affordable housing once a scheme has started and can't therefore be refused. It works both ways and therefore an appropriate level of contribution needs to be agreed from the outset. This should also be part of the consultation process so that communities can be part of the process. Stability is required so that CIL can be agreed for the many councils that have yet to introduce this. Constant changes to the NPPF are unhelpful.

42 Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

Yes

Please explain your answer:

Golden rules must be non-negotiable and apply to all sites, but with more favourable percentages given for brownfield urban development to encourage regeneration. The suggested 50% affordable provision cannot run alongside buffers for non-delivery because larger companies can afford to pause on delivery and let authorities take the wrap to force an increase in targets.

The level of affordable housing should be as high as possible, but it must be possible. Viability should not be undertaken by the developers or by companies with a vested interest in seeing as much market priced housing as possible, but by independent companies, commissioned by councils with input from developers and costs covered by developers. This should be part of the planning consent costs. This information should be publicly available and open to scrutiny.

43 Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

Perhaps this should depend on whether the local council feels that enough affordable housing can be gained without the 50% apportionment? Where a planning application has yet to be submitted the new rules should apply but with flexibility to ensure any agreed infrastructure ensues. For brand new applications where infrastructure requirements have yet to be agreed, the golden rules must apply, but as has previously been stated, with the removal of LA buffers.

44 Do you have any comments on the proposed wording for the NPPF (Annex 4)?

No

Viability and benchmarks have already been commented on

45 Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

No

46 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Green belt land is largely agricultural. The main question appears to be about how and what can be gained by way of affordable housing and infrastructure when building on green belt and not about whether Green belt should be built on. The government would like to see 1.5m homes built and we know that 1m consents are outstanding and 0.25m homes have been left empty, long term, in

England alone. This rises to 700k empty homes if all empty homes are included. The driving force behind the numbers appears to be the belief that the supply and demand rules apply in housing like they might apply to a tin of beans. There are many studies, and real life examples that show that this is not true. Ability to pay and market forces play an enormous part in pricing and whilst the market is developer-led, developers will never build at a rate that will allow prices to fall. Building on Greenbelt as a matter of policy without addressing the real need is not a policy we support, especially whilst such significant numbers of empty homes exist and approved planning applications remain outstanding.

The government is trying to break and rebuild the planning system and the reasons why are evident. Lack of government funding and reliance on developers will however stymie these attempts.

Chapter 6 – Delivering affordable, well-designed homes and places

47 Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes

Please explain your answer:

Need should be the starting point for housing policy to address the housing crisis. Social rent is the most basic of needs. It should be prioritised along with accommodation for older people that meets their needs.

48 Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

-

Please explain your answer:

49 Do you agree with removing the minimum 25% First Homes requirement?

-

Please explain your answer:

50 Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

No

51 Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes

Please explain your answer:

These should be in accordance with a local authority's SHMA (Strategic Housing Market Assessment) to ensure that the development meets local NEED.

52 What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Please explain your answer:

Councils own vast amounts of car parks all over Britain. Most are surface level. An injection of funding could replace these with multistorey car parks (with wide ramps for today's vehicles). Council owned land could then be used for housing that is truly affordable and quick to build. Social housing needs subsidising. Fund it, build it. Also repurpose the extensive number of empty and long term empty homes.

Regenerate large retail and commercial buildings that are no longer required. Rather than CPO's for agricultural / greenfield land, perhaps consider the same for PDL urban sites that are not being released but sit empty?

Planning permission should be refused for developers that have unbuilt outstanding permissions over a certain period.

53 What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Design plays an important role on any large housing estate. Issues can occur if there is inadequate sound insulation, green space, lighting, openness and well-designed communal spaces.

-

54 What measures should we consider to better support and increase rural affordable housing?

Please explain your answer:

Small scale is more acceptable and appropriate for rural settings. Developing barns into small affordable properties rather than large executive properties would create more homes.

Rural areas near the coast are subject to an increasing number of second homes and holiday lets. Whilst holiday lets contribute to the local economy, second homes do not and it is often the smaller cottages, that might otherwise be affordable to local people, that are affected. The NPPF should strengthen efforts to differentiate the two. Local councils should be able to initiate policy that enables local priority is given for where second home ownership is a problem.

55 Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Yes

56 Do you agree with these changes?

No

Please explain your answer:

An exception site should not be a route to large scale development. Parish Councils and local communities, should, where desired, through neighbourhood plans be able to deliver their own housing through community land trusts and community led development.

57 Do you have views on whether the definition of ‘affordable housing for rent’ in the Framework glossary should be amended? If so, what changes would you recommend?

Yes

If Yes, what changes would you recommend?

A figure of 35% of net household income is a figure that is supported by Shelter, National Housing Federation and Joseph Rowntree Foundation. Social housing must be for those most in need.

In the Southeast and no doubt, the home counties in general, house prices including new house prices are 10+ x the average salary. On Greenbelt sites they are more. A 20% reduction does very little to improve affordability for those who most need housing, which is why more government - built social housing is needed. CPRE has suggested that affordability should be related to average income rates for the area. This might improve affordability. The discount should remain in perpetuity.

58 Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Yes

Please explain your answer :

The level of administration and preparation, surveys, plans etc necessary for a big development can be costly and onerous for a small development. Likewise, economics of scale and ability to find skilled labour can be difficult for smaller companies. Add in an affordable component and small sites can have viability issues.

Small sites should be policy compliant in terms of location etc but subject to lower developer contributions to assist with viability.

59 Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to ‘beauty’ and ‘beautiful’ and to amend paragraph 138 of the existing Framework?

Yes

Please explain your answer:

Beautiful is a subjective term, but it shows ambition for something that is better than technically well designed, and the ambition should be retained.

60 Do you agree with proposed changes to policy for upwards extensions?

Yes

Urban heights should be part of the Local Plan design.

61 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

An infrastructure first approach must be taken. No development must be permitted without infrastructure including adequate sewage treatment plants to prevent any increase in sewage discharges into our rivers and seas. Roads, schools and medical facilities must accompany new development along with investment into sustainable transport modes.

Consultations should be more than just tick box exercises, but genuine with community opinion accounted for and not just acknowledged. In today's world of Zoom meetings, it should be relatively simple to organise virtual meetings with interested parties so that key issues can be ironed out to gain better community acceptance for Local Plans.

Chapter 7 – Building infrastructure to grow the economy

62 Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

No

Please explain your answer:

Local Authorities must plan according to what is needed rather than what is expected. Compton is in the borough of Guildford where there are significant allocations for commercial and knowledge-based industry (largely but not exclusively connected to the University).

The policies may be well suited for University areas but less so for rural / areas with limited infrastructure. On the other hand, Universities are struggling at present, and it is vital that studies offered match the need for jobs in this country. These must include increased opportunities for medical roles across the board, engineers of all categories, skilled tradesmen, scientists and architects to fulfil the many roles needed within and outside planning.

Planning must fulfil shortages, ie. what we need as well as forward planning in terms of what we want.

Super infrastructure highways for transport and energy might be more environmentally friendly than building huge warehouses/ gigafactories across the country? Carbon impact should be built into the evidence base.

63 Are there other sectors you think need particular support via these changes? What are they and why?

Yes

It is vital that universities and colleges offer studies to match the need for jobs in this country. These must include increased opportunities for medical roles across the board, engineers of all categories, skilled tradesmen, scientists and architects to fulfil the many roles needed within and outside planning.

Planning must fulfil shortages, ie. what we need as well as forward planning in terms of what we want.

64 Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

Yes, to some degree

Digital infrastructure is a necessity but so is good health, where to draw the line?

65 If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

This must be evidence led. As with all major infrastructure developments any area affected by such changes should also benefit. Currently areas are subjected to change to 'support the greater good' without seeing any advantages and hence do not support it.

66 Do you have any other suggestions relating to the proposals in this chapter?

Yes Please explain your answer:

A blanket allocation of land for a random set of uses is not strategic. All developments should be subject to community consultation and citizen scrutiny.

Mandatory methodology for assessing targets is dictatorial. It should remain advisory.

Chapter 8 – Delivering community needs

67 Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

No

Please explain your answer:

The emphasis is concerning, the text intimates that development is to be encouraged to pay for necessary infrastructure. This is a vicious circle and the reason why key infrastructure should be independent of specific projects. A presumption in favour of development that helps provide infrastructure may also lead to less than impressive designs.

Development should not be approved if infrastructure is not deliverable, and funding is in place.

68 Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Yes

This should include pre, post and school age. ie All ages.

69 Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

No

Please explain your answer:

Paragraph 114, yes. It is imperative that ALL new development is well served by public transport, is walkable and has safe cycle routes. There should be no more 'unlocking' roads and no more car-dependent development.

Paragraph 115, NO. The 'all tested scenarios' wording must be clarified. The tests should be specific, and plan led rather than developer led and exclude assumptions, such as 60% of residents will use bicycles or walk. We support an approach that reduces land take (higher density) and increases active travel (compact developments) with all homes a maximum of 800m walk from public transport or less for sites with a high percentage of elderly people.

Accumulative impact on highways and infrastructure is a major concern for large scale development and policy must be robust to ensure that such development mitigates harm on every level. This can only be achieved if every stage is open to consultation and if the authorities that represent highways etc can be open and honest in their response. There should be explicit reference to the evidence base including the carbon implications of a development (in sufficient detail to support community consultation and enable citizen scrutiny) Car/HGV-dependent, developments should no longer be approved and there should be clear and binding obligations on developers (and public bodies) to provide the necessary sustainable transport and active travel options.

70 How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Please explain your answer:

Car dependent development should be avoided for multiple reasons.

Retain green spaces, play areas, football pitches, parks, and 'beautiful' spaces. One is more likely to take a long walk around an attractive village, open countryside, woods, park than an area that has none of the aforementioned.

Schools need plenty of outdoor space and a curriculum that supports sport/ dance/ fitness/ martial arts, as well as academic subjects. Where this is not forthcoming, links to sports centres and dance clubs along with inter-school/club activity/competition can help motivate young people.

Safe cycle routes to school and chaperoned group walking.

Education is key, along with cooking lessons. Not all children are geared to traditional sport.... schools need to be able to provide activity that's current and enjoyable so that children don't grow up hating 'sport' or activity. Finland and Scandinavian countries are reported to have the healthiest children, and this is in part because activity is not seen as an event but as a way of life.

71 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

Development plans shouldn't be so divisive. Urban areas can combine density with green spaces and when cars are removed, they are both attractive and sustainable. See these developments in Germany; <https://www.linkedin.com/pulse/freiburg-should-we-try-home-rosie-pearson/>

Chapter 9 – Supporting green energy and the environment

72 Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

No

Please explain your answer:

Compton Parish Council supports renewable energy projects, but meaningful consultation must take place, and proposals must be presented in their entirety so that residents can appreciate the combined impact of renewable energy projects in their area, the time frames involved in connecting to the grid and how the energy will be transported from sites to end use. Onshore wind projects combined with large scale solar farms are visually intrusive and every effort must be made to show that offshore wind farms and roof space / brownfield solar applications have been installed first. In an effort to meet a self-imposed target, the priority appears to be speed, whereas it should be about providing the most effective, least intrusive, long-term solution.

73 Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

No (divisive question)

Please explain your answer:

There should be a sequential test for renewables, especially solar, such that a ground-based solar on best farmland is not given permission if rooftops have not been exhausted. All LPAs must be required to have policies for solar on new homes and new commercial buildings and on all car parks. See Italy and France for examples. No Best & Most Versatile Farmland should be lost to solar - there is no need. A report for the CPRE in 2023 found that there is enough rooftop space to

meet the UK's solar targets, and this was backed up by the Warehousing Association's study which found enough south-facing commercial roof space for 50% of England's electricity.

74 Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Yes Please explain your answer:

Protections for habitats, NOT compensatory mechanisms There should be an explicit requirement to secure the restoration of all our peat mosses in line with Natural England guidance to enable carbon sequestration and better water control/management

75 Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Not Answered

Please explain your answer:

Treasury Green Book guidance must be followed along with meaningful public consultation before decisions are made.

76 Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Treasury Green Book guidance must be followed along with meaningful public consultation before decisions are made.

77 If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

N/A

78 In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Subsidise solar panels for residential and commercial/ public buildings.

Through neighbourhood / parish level planning, offer grants to community energy schemes that have the support of the community.

Offer incentives for councils to add solar rooftops on carparks.

Refuse low density, car-dependent development

Ensure through planning, that sustainable transport is workable and deliverable and not a tick box exercise.

Bring empty homes into use

Improve railway infrastructure and add more bus routes.

Convert empty offices to residential

Encourage good high density urban development rather than sprawl. Loss of green spaces and agricultural land is already impacting wildlife and food security.

Planting wherever possible and include a maintenance plan to ensure plants reach maturity.

Creation of a sustainable network of routes for cyclists, including electric bicycles and scooters, and pedestrians.

79 What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Please explain your answer:

Lack of 'in-house' expertise combined with a need to meet high housing targets influences the parameters of the evidence base. Developers are responsible for producing surveys / analysis which is tantamount to marking your own homework.

Results are not always end to end or comprehensive. Some interesting work has however been done by;

Cambridge LPA (<https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/gclp-strategic-spatial-options-assessment-implications-for-carbon-emissions-nov2020>)

Steady State Manchester (<https://steadystatemanchester.net/wp-content/uploads/2023/11/p4e-carbon-impact-report-draft-v5.0.pdf>)

80 Are any changes needed to policy for managing flood risk to improve its effectiveness?

Yes

Applications need to look at wider impact. Building on flood plains can be mitigated against for the development itself by design/architecture. Impact elsewhere however can be harmful as the same volume of water has less space to distribute and engineering works needed to prevent the impact elsewhere can be costly.

81 Do you have any other comments on actions that can be taken through planning to address climate change?

Projects must be fully costed and include all aspects of the project. Increasing energy security is widely supported but increasing costs for residents and businesses could damage the economy. Doing what is best for both with minimal harm might take longer but this would be preferable to meeting self-imposed targets that harm the economy.

82 Do you agree with removal of this text from the footnote?

No

Please explain your answer:

Food security as a priority should be seen alongside climate change. It should be in the body of the text and not in the foot note and most certainly should not be removed. BMV land should be given a high weighting in planning terms.

83 Are there other ways in which we can ensure that development supports and does not compromise food production?

Yes

Please explain your answer:

Do not build on best and most versatile farmland. The wetter spring has resulted in a 20% reduction in wheat and if this is repeated, as is to be expected, it would be harmful to create policy that encourages loss of agricultural land. The land use framework should be published and consulted upon alongside the NPPF amendments.

84 Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Yes

Please explain your answer:

Yes. Where water companies have stripped assets and created debt and not invested in appropriate infrastructure they should be renationalised. If they continue to be run by private companies, regulators must be given the authority to ensure that an appropriate level of investment is placed in new reservoirs, pipes and sewage systems.

Water companies acknowledge and it is evident from the level of sewage dumping that the system cannot take any more, yet the same companies, do not object to new development, but suggest that better infrastructure is needed. Like other forms of infrastructure, it must be forthcoming before development takes place and it must be part of the public consultation process.

85 Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Not answered

86 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 10 – Changes to local plan intervention criteria

87 Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Not Answered

Please explain your answer:

The ‘call-in’ process has a place, but it must be clear that once an application has been called in that it is then properly considered. The recent Sunnica case was decided in the blink of an eye and hence whether the 350-page document had been read and duly considered is highly questionable. All decisions, including decisions made by the Secretary of State must be based on sound evidence and not predetermined.

88 Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Possibly

Please explain your answer:

Existing test cases should sit alongside any new information that challenges the test cases if the decision were to be taken by legal bodies.

Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

89 Do you agree with the proposal to increase householder application fees to meet cost recovery?

No

Please explain your answer:

If the same argument were applied to council tax this would mean increasing payments for those who can least afford it on the basis that more people fall into this category, and it bridges a financial gap. Compton has two conservation areas and residents must apply for planning permission for almost everything. The suggested increase of over £500 per application, especially for minor work is out of proportion.

90 If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

N/A

50% is not a small percentage. Any increase should be commensurate with the size of the project and the level of work expected by the planning department.

Straight forward minor applications should be largely automated, with little to no increase in fees.

Other applications should be graded in terms of complexity and wherever possible, simplified by creating online planning portals where much of the work is automated.

91 If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

No

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.:

Lower than £528.

The planning department is a public service. It operates via government funding and if government wishes to increase its workload by instructing it to take on more planning applications, it should increase funding for the department.

Question 92

Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Fees, if applied in areas where they are mandatory, such as conservation areas, should be minimal. Ideally, systems should be in place that enable minor works to be dealt with via an automated system with the result, overseen by a planning officer. The work minimised rather than making the process more expensive.

Question 93

Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

There should not be a great deal of national variance in application costs. Of the two proposals, we would favour the second, ie setting a national planning fee with minor adjustments by local authorities.

It should be noted that many councils have yet to adopt CIL and still use Section 106 payments. We understand that CIL collection, intended for infrastructure improvements, taken by district councils does not have to be passed to county councils who are responsible for infrastructure.

There is a clear issue in that one council can set the targets for planning whilst another is responsible for infrastructure delivery. This needs to be addressed. Developers argue that increasing the cost of payments to the planning authority for large developments might affect viability. It would however be unreasonable to increase domestic/small scale planning applications and not increase payments for larger developments.

Question 94

Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

NO

95 What would be your preferred model for localisation of planning fees?

There should not be a great deal of national variance in application costs. Of the two proposals, we would favour the second, ie setting a national planning fee with minor adjustments by local authorities.

It should be noted that many councils have yet to adopt CIL and still use Section 106 payments. We understand that CIL collection, intended for infrastructure improvements, taken by district councils does not have to be passed to county councils who are responsible for infrastructure. There is a clear issue in that one council can set the targets for planning whilst another is responsible for infrastructure delivery. This needs to be addressed. Developers argue that increasing the cost of payments to the planning authority for large developments might affect viability. It would however be unreasonable to increase domestic/small scale planning applications and not increase payments for larger developments.

There should not be a great deal of national variance in application costs. Of the two proposals, we would favour the second, ie setting a national planning fee with minor adjustments by local authorities.

96 Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

No

The planning department is a public service. It operates via government funding and if government wishes to increase its workload by instructing it to take on more planning applications, it should increase funding for the department.

97 What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

N/A

98 Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Yes

99 If Yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

N/A

100 What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Not answered:

101 Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent

Not answered

102 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered Please explain your answer.:

Chapter 12 – The future of planning policy and plan making

103 Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

No Please explain your answer:

LPA's with adopted plans or those in the final stages, should not be required to re-do the LP. This questionnaire suggests there is a shortfall of £262m in planning yet seeks to increase its workload by introducing changes that would require a significant level of work.

Once adopted, any changes should only apply to new plans.

104 Do you agree with the proposed transitional arrangements?

No Please explain your answer:

There should NOT be a requirement to immediately start preparation of a new plan for LPA's that are in place and working. Guildford is currently reviewing its plan, which is at the 5-year review stage and it would be a complete waste of time and money to review it again.

We understand that Local Plans must reflect key changes and keep up with the times but this is not reflected by the use of 2014 ONS data in the methodology. Ideally it should provide a

framework for 20-30 years. They should be supported and provide certainty by way of development proposals for each authority. Continuously changing the goal posts creates uncertainty, is costly and the evidence for the changes is unclear. Changes made must be consistent. If they are made to reflect the current climate then more up-to-date ONS data should also be used.

105 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer: We support digitisation particularly if this removes repetition and saves money.

Chapter 13 – Public Sector Equality Duty 106

Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified? Please explain your answer:

The changes proposed concentrate heavily on targets, speed of delivery, developer led proposals and customers paying the price. It is unclear how groups represented by the *public sector equality duty of care* might benefit from these changes? Developers are required to build a higher percentage of affordable housing, but will that include a specific quota for elderly, disabled people? In affluent areas, where properties exceed £800k especially if built on Greenbelt, affordable homes would still be too expensive for most people, yet there doesn't appear to be an increase in council provision of suitable housing? The private sector will not solve the housing crisis and LAs cannot expect them too. There must be a safety net for vulnerable people and these changes do not provide that.