**PLANNING FOR THE FUTURE: MERA RESPONSES**

1. **What three words do you associate most with the planning system in England?***Bureaucratic   
   Old-fashioned  
   Anti-environment*
2. **Do you get involved with planning decisions in your area? (Y/N).***Yes* **If not, why not?**
3. **Our proposals 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)]***Well designed public access on local authority websites  
   Residents’ associations   
   Social media  
   Newspaper   
   By post*
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)].***The environment, biodiversity and action on climate change  
   The design of new homes and places.  
   Protection of green spaces*
5. **Do you agree that Local Plans should be simplified in line with our proposals?**

*We have major concerns that the relaxation of planning controls could result in the consequence of genuine arguments against proposals being stifled due to lack of an adequate consultation process. We are also concerned that there is no category for those areas that are considered to be fully developed. This could lead to inappropriate overdevelopment unless there are strict rules in place to regulate this.*

*We appreciate that the aim of the proposals is to simplify and speed up the planning system and we support this. However, we do not wish to see established residential areas automatically classified as growth or renewal areas, as this could lead to uncontrolled development and increased in-filling. We urge the government to ensure that the guidance associated with these categories addresses such concerns.*

1. **Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?**

*Yes, and we welcome the increased accessibility of policies and plans being made more accessible to the public. We would like to see all local authorities providing easy access to both the NPPF and the local plans for which they are responsible.*

1. **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?**

**How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Co-operate?**

*A simpler test would be supported, provided that clear guidance was established and there was a means of appeal to address clear failures to comply, with specific grounds for appeal set out by the government to avoid spurious appeals being put forward.*

*Clearly, if the ‘duty to co-operate’ is withdrawn, there needs to be an alternative means of resolving cross-boundary issues. Where local authorities cannot agree between them on essential projects that involve more than one planning authority, central government involvement will be required to resolve the issue. This could take the form of a directive or a review of the arguments of each authority and a recommended way forward for local agreement.*

1. **Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?**

**Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?**

*No and no. The increased number of houses the government requires to be built in our Borough has now doubled, and this is completely unacceptable. We do not believe that an algorithm approach is the correct one to take, because the problem is more complicated than this. We would rather that national policy was targeted to the more deprived areas of the country, providing investment to help develop businesses choosing to relocate there and with incentives to encourage people into these designated areas, rather than exponentially adding to the congestion in the south-east. We are opposed to any suggestion that national parks and green belt land could be sacrificed where housing supply has not kept up with demand.*

*Affordability of housing is certainly an indicator of housing pressure, but we believe that a holistic approach is needed for the country, encouraging new employment opportunities to be available in the poorer sections of the country and building new housing developments in those areas. Our view is that pressure for ever increasing development in the south-east is unsustainable.*

1. **Question: 9(a) Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) and faster routes for detailed consent?**

**(b) Do you agree with our proposals for the consent arrangements for Renewal and Protected areas?**

**(c) Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?**

*(a) and (b)Yes, provided that appropriate guidance is made available to ensure that such developments are acceptable and safeguards for neighbours who are impacted by developments that will impact on their properties are put in place. Such developments should never be permitted in designated green spaces within residential areas.*

*(c) Not sure. We would not object to the exploration of whether a Development Consent Order under these projects would be appropriate.*

1. **Do you agree with our proposals to make decision-making faster and more certain?**

*Yes, provided there are sufficient safeguards in place to ensure that decisions are fair to the applicants and the residents impacted by the application and that the interests of occupants in neighbouring properties are safeguarded. Consideration needs to be given to those who do not have internet access and how they will be notified and discover information.*

1. **Do you agree with our proposals for accessible, web-based plans?**

*Yes, these proposals will enable much better understanding and participation by the public, but consideration should be given to enabling those without internet access to be able to discover the information they need in relation to planning planning policy, such as access to documentation in libraries, etc.*

1. **Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?**

*We accept that there is a need to radically reduce the period for the production of Local Plans, but we would question whether Stage 3 permits sufficient time for public comment. If a considered response is to be provided, objectors need sufficient time to gather sufficient evidence to set out their concerns and reasons for objecting. Organisations such as residents’ associations, would be severely impacted by a 6-week timescale to consider the issues, consult their residents and then respond to the Local Plan proposals.*

*We understand the reasons for having a word count limit, this should not be so restrictive that it restricts the ability of objectors to set out their case.*

1. **(a) Do you agree that Neighbourhood Plans should be retained in the reformed planning system?**

**(b) How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital codes and reflecting community preferences about design?**

*(a)Yes, but the process should be simplified and provide a clear means of influencing Local Plans beyond existing and proposed methods available in relation to the Local Plan process itself.*

*(b) We support the proposals for new digital co-creation platforms and 3D visualisation technologies as set out in the consultation document. However, we have noted that some visualisations can be misleading and more honesty is required from developers to ensure that such drawings represent a clearer picture of how the development will look when finished. Clearly, there will need to be sufficient support and guidance available to enable those involved in production of neighbourhood plans to understand the technology and methodology.*

1. **Do you agree that there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?**

*Yes, provided this means that other areas will be protected as a result. It is imperative that we preserve as much countryside as possible as we meet our needs for further housing, and therefore by building on land close to existing developments, this will help to achieve that objective. We would also like to see minimum standards of accommodation, including the need for green energy housing with double glazing and insulation, which should be stipulated in this process. We would like to see stricter measures on the tidiness of front gardens once properties are occupied, with any permitted bushes planted not being allowed to obstruct the pavements. There needs to be adequate car parking provision to eliminate pavement parking.*

1. **What do you think about the design of new development that has happened recently in your area?**
2. **Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?**

*15 Generally, in keeping with the area (which is now well established with little scope for additional development), although often of better quality and appearance.*

*16 Preservation of our green and open spaces; tighter building regulations covering energy efficiency, use of sustainable materials with generous accommodation inside and out; better public transport to reduce car usage (but acknowledging that residents own more cars and need parking space); electric power points for vehicles.*

1. **Do you agree with our proposals for improving the production and use of design guides and codes?**

*Yes, and we particularly welcome the proposals for local guides and local input to them.*

1. **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, and better funding to enable planning departments to perform their new responsibilities is welcome as this is seen to be crucial in enabling the government’s expectations to be properly realised and for the public to be served. We would prefer that no new quangos were set up for this purpose, as this is likely to lead to more bureaucracy and unnecessary expense over time. The beauty of the new arrangements is the simplicity and efficiency of the system, and this is paramount to the success of the government’s proposals.*

1. **Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Home England?**

*Yes, and we welcome the emphasis being placed on better design and high environmental standards for housing in the future.*

1. **Do you agree with our proposals for implementing a fast-track for beauty?**

*Yes, because this will encourage developers to pay more attention to design and environmental standards, which are of the utmost importance. The permitted development proposals must not ignore genuine objections from residents, particularly when their own properties are directly adversely affected by such development, or where there are infrastructure concerns, including the problems of congestion or flooding becoming an issue as a result of such developments.*

1. **When new development happens in your area, what is our priority for what comes with it?**

*We would suggest better infrastructure (including bus shelters and real time information at bus stops), more shops, a sufficient provision for schools and GP practices, with tree planting and good levels of green space provision. However, this will vary according to the area and all appropriate needs should be taken into account. For example, some cul-de-sacs in new estates need more footpath exits to encourage walking to local amenities such as shops, schools, green spaces and public transport. Care should be taken to ensure that we do not encourage exploitation of a system which encouraged omission of such amenities in the initial plans simply to have such costs included within the new levy.*

*With many new developments, there is inadequate provision for vehicles to be parked, and there is no recognition that if a house is later extended or there is infill build, this will add to the pressure for car parking space. This will become even more important as in the future electric cars will need to be powered up on the street. Inadequate parking provision will make this impossible.*

*Flooding is an issue in our area, and it is alarming that such a casual attitude is taken with a view to building on flood plains. Before any such permissions are granted, we would like to see developers taking responsibility for making good any problem arising from normal flooding, perhaps with the lodging of a substantial deposit.*

1. **Questions: (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?**

**(b) Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?**

**(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?**

**(d) Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?**

*(a) Yes, on the basis that this will increase revenue for infrastructure purposes. However, developers should not be permitted to take advantage of the new system by deliberately omitting amenities from their plans simply to enable the levy to pay for them.*

*(b) There should be a national maximum rate, the actual rate set by local authorities, which could be adjusted according to priority needs.*

*c) The new system should aim to capture more value for infrastructure without creating a disincentive for developers.*

*(d) Yes, for the reasons stated in the consultation document.*

1. **Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?**

*Yes, although it might be more equitable to apply the levy only where there are implications for the infrastructure of the area.*

1. **(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?**

**(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?**

**(c) If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?**

**(d) If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?**

*(a) Yes, because if the amount of affordable housing under the Levy was increased, this would reduce the availability of funding for infrastructure.*

*(b) We believe that local authorities should be free to choose which option they wish to apply, but if the consensus is that the present system works well, we see no reason to change to a ‘right to purchase’ model. It might be more sensible to set the proportion of on-site units by local authority areas rather than nationally.*

*(c) Yes, there should be a mitigation for overpayments as described in the consultation document.*

*(d) Yes, there should be a specification for housing quality that all developers would have to meet. Low standard homes should not be permitted, and developers should be liable for not meeting the guidelines set for basic standards to be met.*

1. **Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?**

*Yes, local authorities should have more discretion to spend the levy on local needs (for example bus shelters with real time bus information to encourage residents to leave their cars at home, electric power points for vehicles at the roadside, etc.). These levies should be prioritised for application within the actual areas being developed.*

**25(a) If yes, should an affordable housing ‘ring fence’ be developed?**

*While we acknowledge the need for more affordable housing, we believe that the whole of the Levy should be used for priorities in the area that are determined by local authorities following public consultation.*

1. **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?**

*We agree that the proposals for enhanced digitalisation of the process will provide increased access to the system for most groups, including those with disabilities, but we do have concerns that those without internet access – not only those from poorer households but also those who are elderly and who have no experience of the internet. Clearly, these sections of the community will need to be able to access the system by alternative means.*