

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

Essential

Bureaucratic

Unfair (weighted towards large developers /well-resourced applicants)

**2. Do you get involved with planning decisions in your local area?**

**Yes.** Addingham Civic Society gets involved but the extent of involvement depends on the nature of the proposal.

**3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?**

All of the methods mentioned. However there is a danger of relying solely on digital / social media and excluding sections of the community (elderly, those who don't have/want computers / mobile phones). Especially need to retain newspaper notifications and on-site notification. Note cannot scale digital plans on a phone so hard copy plans and drawings are essential.

**4. What are your top three priorities for planning in your local area?**

What is meant by local area? Our District or our village? For Addingham: -

- i) Retention of character and landscape setting of the village including Green Spaces.
- ii) Promotion of well-designed sustainable new development of a scale appropriate to the village.
- iii) Truly affordable housing both for sale and for rent.

**5. Do you agree that Local Plans should be simplified in line with our proposals?**

**Not Sure.** Zoning – understand how zoning could be useful, particularly identified Growth Zones where major / significant / immediate development proposed or required. Regeneration and Protection Areas – proposals not clear - what areas would they cover, how would a mix of requirements be covered eg some regeneration and some protection in a particular settlement? In the context of Addingham would prefer the second suggested alternative.

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

**No.** Would prefer the second suggested alternative – national standards applied to higher level planning but design and appearance of local development to be decided at local level.

**7. a) Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?**

**Disagree.** Environmental Impact is too important and should be treated separately.

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

The Society **does not agree** to the removal of the Duty to Co-operate – this should be retained and strengthened. Otherwise it will lead to an undesirable non-strategic, unplanned, parochial approach.

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

**Agree.** As long as there is broad agreement on the formula to be used and local conditions are reflected.

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

**No.** Affordability is only one factor of many and could have disastrous consequences if applied to Wharfedale locally (see accompanying summary). Economic viability is more applicable in the North including remediation costs for Brownfield sites and investment to stimulate demand.

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

a) **Agree.** Provided Zone proposal and associated Design Standards have been subject to full Local authority and public consultation. In particular, where automatic approval is to apply, the design standards must include rigorous requirements on sustainability of all aspects of the proposal – climate change impacts/carbon reduction.

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

**Disagree.** Although it could be used selectively in appropriate situations - if applied globally it cuts out local consultation and negates Neighbourhood Plans in their current form.

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

**Agree.** Agree in principle, although this may well be more applicable to the South of England.

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

**Disagree.** The vast majority of applications are already decided within the time limits. It is partly dependant on proper resourcing of Planning Departments which has been a key issue over recent years. There should not be an over-reliance on digitisation, as sections of the community will be excluded. Agree with the refund of application fees if 3 month determination period is exceeded provided fault lies with the local authority and not the applicant. Disagree with the automatic granting of consent if the determination period is exceeded.

**11. Do you agree with our proposals for accessible, web-based Local Plans?**

**Agree.** Could simplify the process, including up-dating policies / standards. However plans / maps / diagrams often difficult to understand and scale on phones and other mobile devices, so paper copies are still required and should be made available locally eg libraries. For significant applications there is role for public exhibitions with access to professionals.

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

**Disagree.** Local Plans do need to be streamlined and speeded up. However a blanket requirement for all applications to be determined within a 30 month period is unrealistic. Areas differ in complexity of challenges, opportunities and different development pressures. 3-4 years seems more realistic. There is a danger that the formulation of zones and design codes in complex areas will extend the average Local Plan preparation time beyond 7 years. The Society is also opposed to any proposal to reduce public participation in public inquiries.

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

**Agree.** Neighbourhood Plans represent a step change in public engagement and should be strengthened and made mandatory (see accompanying summary).

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

Neighbourhood Plans should not be confined to simply producing local design codes. This is an important function but it should be added to the current scope of Neighbourhood Plans. Previous comments on the dangers of relying too much on digitisation apply, perhaps even more so at Neighbourhood Plan level where it is only one element in successful local community engagement.

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

**Agree.** Ways must be found to prevent developer land banking and speed up delivery. It is unacceptable that 1 million planned housing plots remain undeveloped. There is also need to build in safeguards preventing developers flooding the market with cheaper poorly designed and constructed homes to improve “affordability”.

**15. What do you think about the design of new development that has happened recently in your area?**

This question is far too broad and subjective. For Addingham there is “some good and some poor”. There is a disappointing lack of evidence of attention to low carbon and renewable energy as standard (e.g.lack of provision of solar panels or heat pumps). The proposed greater emphasis in the White Paper on Good Design is welcome in principle so that general quality of built development is raised in future.

**16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?**

All of those mentioned, but also type and source of building materials. BREEM Standards should be applied along with good design. The UK has fallen well behind some of its European neighbours in terms of energy efficiency and build quality. Most of the theory and practice has been around for at least a decade but is only now beginning to find its way into planning and statutory building requirements. The Government needs to rapidly ramp up building standards, treat climate change seriously and build sustainably rather than majoring on maximising housing numbers. Measures to include:-

- a. Charging infrastructure for electric vehicles, cycling and enhanced public transport.
- b. Passivhaus standards in all new building and energy efficiency retrofitting in existing buildings.
- c. Requiring SuDs / NFM in all new development and retrofitting SuDs to the existing built up areas.
- d. Measures to support biodiversity in existing open space and wildlife friendly landscaping and design in any new development, in gardens as well as communal areas.

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

**Agree.** Broadly agree but must reflect local circumstances / character. Need to ensure that Design Codes do not become too prescriptive and stifle innovation.

**18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?**

**Agree** to the formation of a new expert body which could provide a valuable resource for small organisations and design quality arbitration. **Disagree** with the appointment of Chief Officers for Design. It would be preferable to encourage local authorities to establish small design teams rather than employ a Chief Officer for design. These teams could provide technical assistance to communities in formulating Neighbourhood Plans. However Planning Departments need to be properly resourced if these goals are to be achieved. Smaller Local Authorities unable to resource in-house design staff could rely on the proposed expert body for advice.

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

**Agree.** The focus of Homes England should remain on the delivery of housing, particularly Affordable Housing (sale and rent) as well as other initiatives such as involving smaller / regional builders in development. Good design including energy efficiency / sustainability should be a requirement and should be assisted by proposed design codes and standards.

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

**Disagree.** “Beauty”- too subjective, meaningless and should be dropped from the White Paper. Better to place the emphasis on a requirement for all new housing development to be of “good sustainable design”. This to include zero carbon building, energy efficiency, acceptable internal and external space standards pertinent to the scale of the scheme, attractive settings with pedestrian / family friendly neighbourhoods and be sustainable. Also integrating SuDs and landscaping for biodiversity. The various standards would be set out in design code guidance.

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

It depends on the type and scale of the development. It would need to accord with Addingham’s Neighbourhood Plan, reflecting local design / character / setting and be complementary to the village. Appropriate infrastructure should be provided to facilitate safe walking and cycling right to the heart of the village. It must not exacerbate current issues with surface and foul water drainage.

**22. a) Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?**

**Not sure.** There could be merit in consolidating CIL and Section 106 Agreements into an Infrastructure Levy but the proposal needs to be spelt out in detail. Section 106 Agreements

are legally binding and a valuable tool for local authorities. Would this be the case with a replacement Infrastructure Levy? We would only support a new levy if it is legally binding.

The White Paper also proposes greater flexibility for Local Authorities to spend the new consolidated levy receipts – on new improved community facilities and reducing Council Tax. The Society strongly disagrees with the proposal to use levy revenue to reduce Council Tax, favouring instead the suggested alternative, that revenues should be deployed on meeting Infrastructure Needs and the provision of Affordable Rental Housing.

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

Infrastructure Levy rates should be 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?**

**No** - would prefer to see development-inflated land value taxed at source to achieve the goals listed in this question (see accompanying summary).

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

**No** – local authorities should not be increasing debt levels. Money should be available from a Central Government fund built up with the tax revenues of c) above.

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

**Agree.** Where projects such as converting offices to residential are allowed under Permitted Development then the levy should apply as these developments are done by developers for commercial gain and do impose extra demands on local infrastructure and services. The White Paper also proposes the levy to be charged on some Permitted Development for changes of use, and where this is a commercial operation which might place extra demands on local infrastructure then the levy should apply. However with all Infrastructure Levy proposals, the levy rate needs to reflect local circumstances, so it can be set at a level (including zero) which will not stifle much needed development or burden businesses / employment creation unduly.

**24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?**

**Disagree.** “Affordable Housing” is a misnomer and only applies to a relatively small percentage of the population. Currently there is a massive pent up demand for “Social Rented Housing” following the demise of Council House building (13,000 units constructed

last year compared to 200,000 units in the 50's). Yes the Infrastructure Levy should raise at least as much revenue as now but it should be redirected to provide local authority and housing association "Social Rented Housing". It should, as currently, apply to small developments as well as larger ones.

**(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?**

Local authorities should be given the "Right to Purchase" at discounted rates.

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

**Yes.** The value of the in-kind delivery should be related to the cost of development.

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

**Yes.** The aim is not to produce low quality ghettos within a well-designed and constructed development.

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

**Yes** – see 24a.

**25(a). If yes, should an affordable housing 'ring-fence' be developed?**

**Yes.** Provided it includes the option for monies to be used for "Social Rented Housing".

**26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?**

This is a Government White Paper and it should ensure that it complies with Section 149 of the Equality Act 2010.