

THE IVERS PARISH COUNCIL RESPONSE TO WHITE PAPER CONSULTATION

Ministry of Housing, Communities and Local Government

Planning for the Future – White Paper consultation (August 2020)

Response of The Ivers Parish Council

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Introduction

Many of the proposals in this White Paper will not deliver the change needed in our locality. They will remove the democratic right of communities to shape the places where they live. Centralised codes will be in place limiting what can go where. The changes proposed for S106 and CIL are likely to hamper incentives for Highway Authorities to deliver essential infrastructure.

Necessary local infrastructure to deal with HGV overload must be delivered. Our locality is car dependent because it is unsafe to cycle and unpleasant to walk with HGVs alongside on narrow rural or village roads.

Further damage to the conservation area and remaining green space must be prevented, the community must have the opportunity for active travel without intimidation or air pollution. The area is car-dependent.

Semi-rural locations such as ours in the green belt, are surrounded by a very narrow fragile strip of green belt. Being close to motorways, Heathrow and urban conurbations of London and Slough puts huge pressure on the green belt from developers and it is essential that very strong protection is afforded to this green lung to the west of London. Developers wanting to frack value from our green belt is not acceptable when there are urban brownfield sites available nearby.

The community is ready to accept development but the planning system must deliver clear benefits to address well understood problems. It must be recognised that planning is not simply about house building but building and enhancing community cohesion and creating places where people want to live and work. Local people understand their areas and how development should be delivered and they need a voice. It is not acceptable for residents to discover that the only contribution that they could make to shape the development that is going to be imposed upon them was 5 years ago when a local plan was being rushed onto place.

The several national infrastructure projects that may significantly impact the area must be co-ordinated at a strategic level and take account of local views and circumstances – it must not be entirely dictated by Central Government.

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THE IVERS PARISH COUNCIL RESPONSE TO WHITE PAPER CONSULTATION QUESTIONS	
<i>Questions in White Paper Consultation</i>	The Ivers Parish Council Response
PILLAR 1: PLANNING FOR DEVELOPMENT	
1. What three words do you associate most with the planning system?	1. Vision/ Co-ordination 2. Conservation 3. Sustainability It must be about good design to shape high quality places.
2. Do you get involved with planning decisions?	YES
3. Our plans 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 decisions in the future?	Online news /Social media/ Newspaper / By post The changes suggested may make it easier for professionals to access the planning system but are likely to disadvantage other interested parties.
4. What are your top 3 priorities for planning in your local area?	The provision/enhancement of local infrastructure; Protection and improvement of green spaces; Increasing affordability of well designed housing Without improved infrastructure it will be difficult to protect green spaces, improve the affordability of housing or achieve any of the other priorities.

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<p><i>5. Do you agree that Local Plans should be simplified in line with our proposals?</i></p>	<p>No.</p> <p>Designation of 'Growth' and 'Renewal' areas should remain separate. They should not be combined into one category.</p> <p>Simplification may be needed but not to the extent proposed, granting permission in principle is anti-democratic.</p> <p>Local plans may become simpler and quicker to produce but land designations applied by the Local Planning Authority at the start of a LP period are then fixed till review some years later.</p> <p>"Renewal areas" are defined as 'existing built areas' and refers to 'infill of residential areas'; it is unreasonable that permission in principle should be granted where there are settlements and residents will have no option to comment.</p> <p>Growth areas "suitable for substantial development"; if substantial development is to be defined in policy - is that at a National level or more locally?</p> <p>Areas that are Protected..."would require more stringent development controls to ensure sustainability". That is disingenuous. There are development controls now on GB and AONB, SSSI but that hasn't stopped Government promoted projects, in the name of the National Interest, cutting through swathes of GB, ANOB and SSSIs. That's on land with the highest level of protection now. How is designating land "protected" going to confer any greater protection?</p> <p>The impossibility of protecting land with exceptional quality or strategic importance is admitted in the statement:- "For Protected areas, the key and accompanying text would explain what is permissible by cross-reference to the National Planning policy framework".</p> <p>So, in simple terms, Protected areas are not protected.</p>
<p><i>6: Do you agree with our proposals to streamline the development management content of Local Plans?</i></p>	<p>No</p> <p>The NPPF is already the primary source of development management policies.</p> <p>How is this to work when the Local Planning Authority is a unitary council producing a single LP for several former districts? Local opinion will not be considered and local distinctiveness will disappear.</p>

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<p><i>7a: Do you agree with the proposal to replace existing legal and policy tests with a single test of sustainable development, which would include consideration of environmental impact?</i></p>	<p>No, unless such a test will meet the definition in the NPPF.</p> <p>Sustainable development as described in the NPPF:- “At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”</p> <p>This should be retained but it also needs to be implemented in practice. Permitting development without consideration of environmental impact and ensuring delivery of the infrastructure to serve it, is far from sustainable.</p>
<p><i>7b: How could strategic cross-border issues be best planned for in the absence of a Duty to Co-operate?</i></p>	<p>The proposals in this White Paper will not address the failure of strategic planning. A mechanism for strategic cross border infrastructure projects needs to be developed</p> <p>The Ivers are an example of the failure of strategic planning. The situation of the parish in the far south eastern corner of Buckinghamshire; sandwiched between Slough in the west, Hillingdon in the east and the former County Council remote in Aylesbury; has allowed the problems apparent for many decades to continue unresolved.</p> <p>Strategic decisions in the past; construction of the M4, M25, M40, motorways that surround The Ivers took no account of the pressure that that connectivity would impose on the communities. Now, Crossrail, Western Rail Link to Heathrow(WRLtH), further Heathrow expansion, all supported by government without consideration of the strategic issues for The Ivers.</p>
<p><i>8a: Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?</i></p>	<p>No</p> <p>The constraints in this area are significant, not only Green Belt but congested roads, poor air quality and poor local connectivity leading to high car ownership.</p> <p>A simple mathematical needs assessment will fail to consider these constraints.</p>
<p><i>8b: Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?</i></p>	<p>No</p> <p>Proximity or easy access to major centres leads to dormitory settlements, often with a high level of rented properties where prices remain high however many homes are built.</p>

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<i>9a: do you agree there should be automatic outline planning permission for areas for substantial development (Growth areas) with faster routes for detailed consent?</i>	<p>No</p> <p>Until the means is published for interested parties to address any issues of concern, there should be no permission in principle on any land. Local communities need to have a say in development that will significantly impact them.</p>
<i>9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?</i>	<p>No</p>
<i>9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?</i>	<p>No.</p> <p>It is not a transparent process and deprives those affected from any right to express an opinion. Local communities need to have a say in development that will significantly impact them</p>
<i>10. Do you agree with our proposals to make decision-making faster and more certain?</i>	<p>“Faster and more certain” seems to place reliance on digital technology. For planning authorities that may be an advantage but digital technology is disenfranchising parts of local communities that cannot access this.</p> <p>How much confidence can be placed on the government’s ability to “modernise software ... to improve the user-experience and reduce errors and costs...”. (para 2.39)</p>
<i>11. Do you agree with our proposals for accessible, web-based Local Plans?</i>	<p>Yes</p> <p>If the public become more engaged and express viable opinions counter to the plans’ proposals will the proposals change?</p> <p>The public will remain engaged for only as long as they feel their opinions count.</p> <p>Hard copy and other methods must be available to ensure plans are accessible to all of the community affected, including those who do not use or have access to computers.</p>
<i>12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?</i>	<p>No</p> <p>This is a very short timescale for production of a Local Plan that will have several stages of consultation. Local communities must not be disenfranchised.</p>

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<p><i>13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?</i></p>	<p>Yes</p> <p>Neighbourhood Plans are a valuable part of the plan-making system and will contribute to raising awareness of the opportunities for involvement in Local Plans. They are an essential way to deliver at the local community level.</p>
<p><i>13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?</i></p>	<p>Different neighbourhoods will have different resources. Ensuring consistency of digital tools will require Local Planning Authority to administer. Standard templates could be a way to simplify NPs. NP policies will be specific to the neighbourhood and design codes could be used to reflect community preferences.</p>
<p><i>14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?</i></p>	<p>Yes</p> <p>Too often developers apply for extensions beyond the 3 year term of a permission, even for relatively small sites involving one developer.</p> <p>It is suggested at Proposal 6, para 2.40, that Local Planning Authority should be penalised for failing to meet targets for determining applications. The same should apply to developers, eg. double the infrastructure levy.</p> <p>Whilst phasing might be retained there should be clear development masterplans to ensure build out is controlled</p> <p>The burden on communities of several sites under construction is not properly recognised and “allowing more phases to come forward together” will have the same effect. Plant, machinery and construction vehicles all using the same, often residential, roads over the same period is a serious concern. Communities will be disrupted by increased traffic, noise and dust, and deteriorating air quality.</p>
<p>PILLAR TWO – PLANNING FOR BEAUTIFUL AND SUSTAINABLE PLACES</p>	<p>The Ivers Parish Council Response</p>

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<p><i>15. What do you think about the design of new development that has happened recently in your area?</i></p>	<p>Ugly and/ or poorly-designed</p> <p>Pinewood Studios, granted permission to build on 44ha of Green Belt, have built sound stages 20m high. They are large, highly visible industrial buildings with developing planting within sight of homes on the adjacent estate.</p> <p>Other development is formulaic to a restricted palette. There have been few sites with more than 10 homes and these have been infill development where, 'in keeping' is the ambition to ensure permission. Hardstanding dominates to provide for cars and parking space is inadequate for the number of cars/ household.</p> <p>Where landscape plans are submitted, the development is not monitored for compliance unless residents refer to enforcement. In this area, checking landscape details is a low priority.</p>
<p><i>16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?</i></p>	<p>Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees /</p> <p>Until a relief/bypass road is provided there is little likelihood of sustainable development in The Ivers.</p> <p>Transport by road dominates, by car and HGV. The traffic is intimidating so that walking or cycling locally is dangerous.</p> <p>The parks and green spaces are well used and appreciated but access to them is by car.</p> <p>As well as the above there are areas where Green Belt could be improved for wildlife and connectivity for both people and wildlife.</p> <p>It has been shown during the Covid-19 pandemic that people value their local countryside for health and wellbeing. In The Ivers, access to good quality green spaces is doubly precious and improvements to footpaths/cycleways across the whole parish is an emerging plan.</p>
<p><i>17. Do you agree with our proposals for improving the production and use of design guides and codes?</i></p>	<p>Where areas have special characteristics those should be protected when changes to buildings are proposed and also reflected in new development.</p> <p>Design guides need to be produced by principle authorities working with town and parishes not by developers as suggested in the White Paper</p> <p>Design guides should include the spaces around buildings and improving the wider environment where development is not planned but improvement should be sought.</p>

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<p><i>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?</i></p>	<p>No</p> <p>This is another unnecessary quango and there is no indication of how it would be funded.</p> <p>A central body might promote the designs 'in fashion' leading to less locally distinctive buildings. Place-making includes consideration of landscape and protected land and views. Local Planning Authorities are in a better position to understand those.</p>
<p><i>19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?</i></p>	<p>No</p> <p>It adds another layer of complexity to the process. What is the definition of beautiful - this is a local not a national matter and involves a consideration of place not just buildings</p> <p>The question implies that Homes England, a Government body, is failing in delivering beautiful places.</p>
<p><i>20. Do you agree with our proposals for implementing a fast-track for beauty?</i></p>	<p>No</p> <p>Para 3.18 Requiring masterplans and codes prepared by a Local Planning Authority could result in standardisation across a whole area without consideration of local distinctiveness.</p> <p>Para 3.19 Permitted development currently applies to existing buildings and domestic curtilage. To extend PD to whole developments risks losing opportunities to secure better integration and connectivity with existing communities as well as posing a threat to conservation areas. Local orders will be essential.</p> <p>To place beauty at the forefront of planning will be contentious. Who decides what's beautiful and how does it fit with utility and provision of services? Buildings must serve a function as well as be beautiful.</p>
<p>PILLAR THREE – PLANNING FOR INFRASTRUCTURE AND CONNECTED PLACES</p>	<p>The Ivers Parish Council Response</p>
<p><i>21. When new development happens in your area, what is your priority for what comes with it?</i></p>	<p>A relief/bypass road. Safe roads free of HGVs and better public transport. A secondary school. Well designed buildings and green spaces.</p> <p>Huge developments have been approved on Green Belt and this is expected to continue. Mitigation for loss of GreenBelt and improvement of what remains must be part of any package.</p>

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<i>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?</i>	<p>No</p> <p>CIL is an important part of the engagement with local communities in development to enable the shaping of the local infrastructure and should be retained.</p>
<i>22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?</i>	<p>No comment</p>
<i>22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?</i>	<p>More value</p>
<i>22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?</i>	<p>Yes.</p> <p>It is the only way that The Ivers might get a relief road</p>
<i>23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?</i>	<p>Yes.</p> <p>Large office buildings converted to apartments impose greater demands on the existing community facilities.</p>
<i>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?</i>	<p>No</p> <p>As otherwise developers could play one off against the other</p>
<i>24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?</i>	<p>Neither of these options.</p> <p>This leaves room for clever accounting.</p>

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<i>24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?</i>	No comment
<i>24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?</i>	Yes. After all the statements in this consultation document about quality and beauty of the built environment it's incredible that a lack of quality should be contemplated. At 3.35, 5.28 and 5.29 stronger enforcement and enforcement of planning and building regulations is proposed, will that not be sufficient to ensure quality? If quality is poor there should certainly be a penalty.
<i>25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?</i>	Yes. There should be priority lists decided by the community after proper consideration of feasibility.
<i>25(a). If yes, should an affordable housing 'ring-fence' be developed?</i>	Funding for affordable housing is essential and a proportion of a levy should be ring-fenced.
<i>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?</i>	No comment

Proposal 24

Further comment:-

The Ivers Parish Council is strongly supportive of strengthened enforcement powers and sanctions.

In all of these proposals Local Planning Authorities need to be well resourced to ensure timescales are adhered to and when unlawful development or breach of planning occurs, the law needs to support Local Planning Authorities. The cycle of unlawful/breach of planning - enforcement - Planning Contravention Notice (PCN) - planning application - application refused - appeal - dismissed - enforcement - appeal against enforcement - dismissed. That takes too long and can take longer if cases go to court.

The people responsible usually know full well what they are doing, continue to conduct their unlawful operation and make a huge profit while destroying land and imposing their operation on residents.