Consultation Questions:

1. **What three words do you associate most with the planning system in England?**
   Developer greed & cost-cutting

2. **Do we get involved with planning decisions in our area?**
   a. Yes, all the time as a Parish Council
   b. N/A

3. **How would you like to find out about plans and planning proposals in the future?**
   Residents use Local Digital Neighbourhood Groups, called Community Email Noticeboards; and our Parish Council Website (for those who use computers). Parish Councillors receive email notifications as soon as applications are received and decided.

4. **What are your top three priorities for planning in your local area?**
   i. Supporting the local economy by attracting jobs for working age people
   ii. Building homes (affordable or market) that young people/families can afford
   iii. The environment, biodiversity and action on climate change

5. **Do you agree that Local Plans should be simplified in line with our proposals?**
   Some simplification is necessary, and could happen in a measured way building on the massive improvements launched in 2011.
   What this White Paper proposes is building huge numbers of homes very fast. Introducing centralised schemes quickly in order to achieve a single purpose is, in our view, fraught with risk. Despite fancy words about wonderful design and fast-track beauty, developers will take shortcuts and produce poor quality homes; existing communities will be pushed apart; local councils will be reduced to box-tickers; and voters will be angry at having choice taken away from them.
   Even worse, at every level your proposals will be utterly dependent on new software, to run the scheme and carry the design codes. Show us the government software that works without glitches from the beginning – Look at track and trace! Every time the planning software goes down, planning will stop.

   So, our answer to this question is emphatically **NO**, not in line with your proposals.

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. Again, too much central control. The alternative 2.16 is slightly better, although, it looks as if County 'Local Plans' cannot deal with much, of concern within the County they know well. Using the term 'Local Plan' for Counties is going to be confusing to residents who have been contributing to NDPs for their areas. They are used to referring to their Parish NDP as the 'Local Plan'. Is this deliberate?
   Your intention to work the whole thing in digital will certainly be the future, but other formats must be available over 10 or more transition years to avoid alienating older voters many of whom either do not use computers, or limit their use to email and Skype.

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?**
   Yes. Under existing tests not a single solar or photovoltaic panel has been installed during the building of homes within our NDP, and developers are still using 1x1 roof struts which means panels could never be bolted on to them.
   b. **How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?**

Not sure. It is critical that proposed developments in one area be made known to the neighbouring areas in order to avoid misunderstanding, dumping one area's noisiest industry on the border with another area, or even duplication of facilities. Co-operation is essential between good neighbours.

8. **a. Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?**
Not sure /No. Nothing in the related paragraphs takes sufficient account of rural areas

b. Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?
Not sure. The question only deals with urban areas. Rural areas can be ruined by wrong decisions about affordability. Developers become wealthy by building sites with numbers below the affordable homes threshold, and then building 3 and 4 bed houses of which there are already too many. With no 2 bed homes and no affordable homes, neither young families nor kids who grew up in this area can afford to live here. The average age in the local population rises and the jobs and amenities go, requiring people to drive elsewhere for shopping, services and leisure. That's not sustainable.

9. **a. Do you agree that there should be automatic outline permission for areas for substantial development (areas) with faster routes for detailed consent?**
Not sure. It is unlikely that our area will be a Growth area. However much the Paper goes on about design, it is hard to believe that automatic outline permission for Growth areas, along with the rush to build, will *not* result in same-ness all over the country

b. Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?
No. There is not enough detail in your proposals, and as yet there is no evidence that everyone will "have confidence that the plan will be the basis for decisions," even if the government intends "to strengthen the emphasis on a plan-led approach in legislation". In rural areas many residents have little confidence that government plans lead to *good* decisions.

c. Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?
Not sure. There is not enough info given about the Nationally Significant Projects regime. National Projects do not have a good track record in England.

10. **Do you agree with our proposals to make decision-making faster and more certain?**
Not sure. There is huge reliance on digital / tech throughout this White Paper. Tech firms try hard to produce well-designed software to deliver purposes given by the organisations that hire them. There are always glitches when the software goes live. Glitches don't really matter to the tech company itself because they already have you using their tech, and they will earn lots more money fixing more and more glitches as years pass. But glitches will matter to a tech-based government planning scheme that goes off-line over and over, stopping ordinary transactions, and making planning slower.
Relying on tech for speed is the future, but it's going to have to improve a lot to deliver.

11. **Do you agree with our proposals for accessible, web-based Local Plans?**
Yes, but see above response, and remember you will be disenfranchising everyone who does not use tech. This probably will not be an issue in about 10 years. In the meantime, these people are still voters, some of whom have land.

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

Not sure. No doubt the Local Plan process should take less time. However, the part played by the inspectorate looks draconian, and it is not clear whether the government welcomes comments from individuals or not. Apparently "best in

class" ways of ensuring public involvement will be used, but limiting the conversation with the public to digital means when very many of your older voters don't use much digital, and putting limits on word counts from public responses suggest that "best in class" is not very good for the public.

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

In 2011 when Neighbourhood Planning was proposed, the stated purposes underlying it were to involve local people – "grass roots" - in the planning of their communities. In addition much emphasis was put on creating 'sustainable' communities which meant energy efficient and environmentally, but which also meant communities with a good balance of ages with housing, employment and leisure available for every age.

In reply to the launch of NDPs a huge amount of work was undertaken by local people in parishes all over the country, who were glad to have been asked to do this important thing. Huge amounts of consultation took place, involving the issues of REAL importance to each area. Stringent inspection assured that proposals made, met all levels of legislation.

- The development of the Eardisley Group NDP in this area engaged more people, more deeply than anything that we have been asked to do for many years. Many people were sceptical but pleased at last to be involved in consultation throughout the making of the Plan. The fact that the Plans would have force of law, encouraged residents to think the process was worthwhile.
- Since then, however, County Councils have been under huge pressure to build homes. Developers have, in rural areas been able to build small numbers of 3 and 4 bed homes, bypassing the requirement for affordable homes, and contributing nothing to the sustainability of rural communities.
- Sadly, many areas like this one are now less sustainable than they were before Neighbourhood Planning; they are closer to losing amenities and becoming an area of retirees, where residents have to travel elsewhere for shopping, services and leisure.

So, something needs to be done. The White Paper is a centralised attempt to making it easier and faster to build houses, relying on assumed planning permission and pre-ordained templates by which everything will be done.
So, should Neighbourhood Plans be retained in the reformed planning system?
No.
The White paper is **not** based on the intention to involve local people – "grass roots" - in the planning of their communities. There is no option for the consideration of the **real issues** individual communities face, or the location or numbers of houses to be built. The definition of sustainability emphasises climate change and energy efficiency, which is necessary. But there is little about communities balanced in age, appropriate housing, jobs and recreation.

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?**

It can't!
NDPs without thorough consultation about real community concerns and without development-management policies in them, and presumably without force of law are not NDPs. They are too different in intention – the proposed scheme does not seek to involve the 'grass roots' in the development of their communities. All that is left of Neighbourhood Planning is some choice of house designs gathered and manipulated using digital tools. If government continues to call it Neighbourhood Planning, it will be deliberately misleading voters.

And, thousands of voters who put years of their lives into consultation and formation of policy, and jumping through hoops of legislation to create real NDPs will be deeply insulted.

By all means make up some activity in which parishes, and other small areas, can do something that fits government objectives, and call it by an accurate name, like 'Design Choices' or even 'Neighbourhood Design'! But DO NOT pretend it is Neighbourhood Planning, because it isn't!

It would be wise for you to make careful provision to ensure that the many communities that did produce

Neighbourhood Plans, conforming to the original definition of Neighbourhood Planning, are supported to see what if anything of the original Plan still has any value.

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?

Yes, make rules for it as you are for everything else, and fine the companies that don't comply.

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

At best boring, with no PV panels or ground-source heating, no trees, play areas or parks, and no affordable homes, no 106 gain for the village. This is because housing numbers are too small in each case to require gain for the villages. Rural areas need special thresholds, and other measures, to make sure greedy developers do not make a killing for themselves while leaving villages without the kind of housing and leisure they need.

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

Affordable homes and two-bed market homes / jobs / energy efficiency homes / new housing that does not exceed the density of existing heritage homes / realistic parking for home owners who are stranded in rural areas with very few buses /parking areas for visitors (heritage houses in our villages attract many visitors) / cycling trails

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

Not sure – it depends on how sympathetic the designs are for heritage areas.

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?

Not sure. It could work if small builders and self-builders are required to adhere to designs chosen for the area, and the quality to which they must be built. In small areas, things can slip under the wire. Putting in a new body and a chief officer might help, or just be posturing with no real protection for existing rural heritage communities.

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

Yes, as long as affordable and 2-bed starter homes are not priced out of reach of young families by excellent design.

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

Not sure. The paper seems repetitious and full of fine words, mainly about making development even faster if more rules are followed.
You can't legislate communities, where everyone knows their neighbours, into being. Communities grow gradually, and are far less likely to do so in cities. Design might help, but the few areas that make it become pricey and out of reach of the young and jobless.
We are left with questions. Since the paper proposes to have many huge development sites all over the country, worked by 4 or 5 Home Builder Companies on-site at once, where will all the *skilled* builders come from? Sending people on courses gives them knowledge, not skill. Where will the *skilled* inspectors needed to make

sure the quality of building is decent, come from? And where will all the bricks and other supplies come from? And when thousands of homes are ready and England has been ravaged by Covid for years and many thousands of people have lost their jobs, who is going to buy all these homes?

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

We are a group of 3 parishes with a total population of around 950 residents. So far in the life of our NDP, we have built no affordable homes because the site numbers are under the affordable home threshold. We have had no CIL or 106 money. We have a new site coming – it will be 18 homes and include affordables. There will also be gain - a hard surface path from the new site to the village centre. This site will deliver real priorities!

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?
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?

Not sure about any of these because in a rural area many of the proposals are set at a number of homes (deliberately) below the threshold. Actually achieving affordable homes or CIL / 106, all of which we need badly, is very difficult. Most of your proposals above are aimed at huge sites and do not help rural areas at all. We think there needs to be better thinking done about how the needs of rural areas can be met. Otherwise we will continue to drive young families away from our villages because there are no homes they can afford, and we will continue to be unable to improve infrastructure.

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

Not sure how this affects small population rural areas.

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?
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?

Not sure, since once again your proposals refer to much larger sites and vast amounts of money. Rural areas do need affordable homes but how to get them is a frustrating puzzle.

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

Not sure unless we know how it would impact on rural areas.
The following excerpt, from the response to your White Paper by the **Rural Services Network,** expresses the kind of dilemmas faced in rural areas:

"Affordable Housing Thresholds: The proposal to raise the threshold that triggers affordable housing contributions from 10 to 40 or 50 dwellings for a limited time period will drastically reduce the supply of rural affordable homes. This is because in many rural communities, residential developments tend to be smaller than 10 dwellings. Many rural communities, therefore, will see no affordable homes being provided at all. The consultation document proposes an exemption to this rule in designated rural areas based on the S157 1985 Housing Act definition. However, this measure will be largely ineffective because it will not apply to 70% of smaller rural communities.

Gone will be the opportunity provided by Rural Exception Sites to provide a mix of affordable homes tailored to the specific needs of the community, often including discounted market sale in perpetuity. The RSN has proposed some amendments to these proposed policies:

A. Replace the definition of designated rural areas from those areas listed under S157 regulations to all parishes with a population of 3,000 or fewer. This would provide a definition that is transparent and readily understandable, easy to evidence and update, efficient and simple to apply, whilst providing consistent coverage across rural England.
B. Adopt the wording in the NPPG1 that was introduced in July 2019 that allows local planning authorities to set their own thresholds for affordable housing in their designated rural communities but, as above, not just those with S157 designation."

In summary, the Eardisley Group of parishes' priorities will remain:

- Ensuring genuine local resident involvement and local accountability;
- Commitment to saving our brownfield sites for employment;
- Commitment to achieving affordable homes and 2-bed homes in our rural areas and NOT being defeated by inappropriate thresholds exceeding the size of our developments;
- Commitment to making developers build in environmental, energy savings and ecological measures;
- Commitment to 106/CIL investment reaching our small communities.

END

