



Hadleigh Town Council

The Guildhall,
Market Place,
Hadleigh,
Suffolk
IP7 5DN

Tel: 01473 823884

PLANNING ADVISORY COMMITTEE

Councillors James Bayliss, Carolyn Cammack, Gordon McLeod, Carol Schleip (chair), Gavin Talbot.

Councillors are summoned and members of the public and press are warmly invited to attend a meeting of Hadleigh Town Council on **Tuesday 22nd September 2020 at 7.00pm via video conference**

Members of the public and press who wish to “attend” the meeting may follow this link:

<https://zoom.us/j/96309755574>

or telephone: 0203 901 7895

You will be held in a “virtual waiting room” and admitted at the appropriate time to start the meeting. The normal rules about conduct and participation in a Council meeting still apply.

The Council, members of the public and press may record/film or broadcast this meeting, when the press and public are not lawfully excluded. Any member of the public who attends this meeting is advised that the Town Council cannot control 3rd party recording.

AGENDA

1: Opening	a) Welcome and opening remarks from the Chair b) Apologies for absence c) Members’ declarations of pecuniary and non-pecuniary interest d) Consideration of requests for dispensations.
2: Public Forum	15-minute session. Maximum 3 minutes per person. If members of the public wish to speak they are advised to inform the Town Council Manager in advance to ensure that they are given the opportunity within the videoconference platform. The use of the “raise hand” icon should be used to notify the chair that you wish to speak.
3: Minutes	To approve minutes of the Planning Advisory Committee meeting on Tuesday 8 th September 2020.
4: Planning Applications	To consider and make recommendations on the applications for Planning Consent listed below: a) DC/20/03569 Proposal: Application for consent to display an advertisement(s) - Installation of 3no. internally illuminated Fascia signs, window graphics, 1no. Quill Flag and 1no. Pavement sign Location: 1-3 Long Bessels, Hadleigh, Ipswich, Suffolk IP7 5DB b) DC/20/03738 Proposal: Householder Application - Erection of single storey rear extension Location: Setway House, 23 Fullers Close, Hadleigh, Ipswich Suffolk IP7 5AS c) DC/20/03886 Proposal: Application under S73 for removal or variation of conditions relating to DC/20/00988 dated 22/04/2020 - To vary Condition 2 (approved plans and documents) revised drawings to enable adequate living accommodation and storage for Manager and Holiday Let. Location: Shepherds Rest, Pond Hall Road, Hadleigh, Ipswich Suffolk IP7 5PS d) DC/20/04043 Proposal: Householder Planning Application - Erection of first floor rear extension (amended scheme to previously approved DC/20/02898). Location: Deanery Lodge, Church Walk, Hadleigh, Ipswich Suffolk IP7 5ED



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5: Planning Decision Notices	To note the schedule of planning decisions made by Babergh District Council.
6: Neighbourhood Plan update	To note the next steps for the development of the Neighbourhood Development Plan.
7: Planning for the future consultation	To receive a report by the Town Council manager that includes a draft response to the Government's consultation, and to note that discussion about the draft response will take place at subsequent Planning Advisory Committee meetings until the 27 th of October where the final response will be agreed for submission to the Government.
8: Future Meetings	The next Planning Advisory Committee meeting will be on Tuesday 13 th October 2020 by video conference.
9. Close of meeting	Not later than 10.00pm

Prepared by

A. McMillan

Andrew McMillan
Town Council Manager
17 September 2020



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PLANNING ADVISORY COMMITTEE

8th September 2020 at 7.00pm via video conference

Draft MINUTES

1: Opening	<p>a) The Chair welcomed Councillors and the public Chair noted the Council, members of the public and press may record/film or broadcast this meeting, when the press and public are not lawfully excluded.</p> <p>Councillors attending: McLeod, Schleip (Chair) Bayliss. Also in attendance: The Town Council Manager, 4 members of the public.</p> <p>b) Councillor Talbot was noted as absent from the meeting</p> <p>c) Declaration of interests</p> <p>a. The agenda included planning applications submitted by the Town Council. Under the Localism Act 2011 councillors are required to register any disclosable pecuniary interests they have. Membership of the Town Council is not a disclosable interest that needs to be registered or declared. However, under the Suffolk Local Code of Conduct members are also required to declare any 'Local Non Pecuniary interests' when a matter arises at a meeting which relates to any of the categories of Local Non Pecuniary Interests listed in the Code. Membership of a body exercising functions of a public nature is one of the categories of LNPI and consideration of a planning application submitted by the Town Council would give rise to a LNPI that must be declared at the meeting. However, Councillors may participate in any discussions or debates relating to or concerning any of their LNPis. Accordingly, the members declared an LNPI as Members of the Town Council.</p> <p>b. Councillor Schleip stated that she lives near to the DC/20/03437 application site but does not know the applicant. It was confirmed that this was not a disclosable interest.</p> <p>d) No requests for dispensations were made</p>
2: Public Forum	No members of the public wished to speak.
3: Minutes	<p>a) Proposed by Councillor McLeod, Seconded by Councillor Schleip and unanimously agreed, the minutes of the Planning Advisory Committee meeting on 5th August 2020 were approved.</p> <p>b) Proposed by Councillor Schleip, Seconded by Councillor McLeod and unanimously agreed, the minutes of the Planning Advisory Committee meeting on 18th August 2020 were approved.</p>
4: Planning Applications	<p>Councillors considered the following applications for Planning Consent listed below:</p> <p>a) DC/20/03211 Erection of 2no. bungalows at Janheir, Boswell Lane, Hadleigh, Ipswich Suffolk IP7 6BX. Proposed by Councillor McLeod, Seconded by Councillor Schleip, it was unanimously agreed to support the application.</p> <p>b) DC/20/03437 Erection of first floor front extension at 135 Castle Road, Hadleigh, Ipswich, Suffolk IP7 6JP. Proposed by Councillor McLeod, Seconded by Councillor Schleip, it was agreed to support the application.</p> <p>c) DC/20/03589 Erection of single storey rear extension including raised decking at 19 Cranworth Road, Hadleigh, Ipswich, Suffolk IP7 5BA. Proposed by Councillor McLeod, Seconded by Councillor Schleip, it was unanimously agreed to</p>



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recommend to the Planning Authority to consider the potential for overlooking from the raised decking.

- d) **DC/20/03405** Listed Building Consent - Replace gas boilers with 2no. new boilers including new flue outlets and brick off existing flue outlets at Guildhall Complex, Market Place, Hadleigh, Ipswich Suffolk IP7 5DN. It was noted that this application was submitted by Hadleigh Town Council. **Proposed by Councillor Bayliss, Seconded by Councillor McLeod, it was unanimously agreed to support the application.**
- e) **DC/20/03595** Replace gas boilers with 2no. new boilers including new flue outlets and brick off existing flue outlets at Guildhall Complex, Market Place, Hadleigh, Ipswich Suffolk IP7 5DN. It was noted that this application was submitted by Hadleigh Town Council. **Proposed by Councillor Bayliss, Seconded by Councillor McLeod, it was unanimously agreed to support the application.**
- f) **DC/20/03020** Erection of rear single storey extension at 18 Station Yard, Hadleigh, Ipswich, Suffolk IP7 5TG. **Proposed by Councillor McLeod, Seconded by Councillor Bayliss, it was unanimously agreed to support the application as it is in keeping with the Conservation Area.**
- g) **Applications SCC/0090/19 & SCC/0091/19** for an increase in the number permitted numbers of HGVs, installation of lighting and re-phasing of operations at Hadleigh quarry. SCC/0090/19: <http://suffolk.planning-register.co.uk/Planning/Display?applicationNumber=SCC%2F0090%2F19>
SCC/0091/19: <http://suffolk.planning-register.co.uk/Planning/Display?applicationNumber=SCC%2F0091%2F19>
The Committee noted the separate issues of Material Planning Matters as distinct from concerns around the process that has been followed. **Proposed by Councillor McLeod, Seconded by Councillor Bayliss, it was unanimously agreed to recommend refusal of both applications and resubmit the original objection, and to support the request made by Aldham Parish Council to**
- seek a clear explanation of the voting process (or lack of process) at the DRC on the 15th July;
 - the process subsequently being followed (ie the “re-consultation”);
 - to examine the actions of SCC officers in this matter.

Councillor Bayliss lost connection at 19.37. He returned to the meeting at 19.38.

- h) **DC/20/03390** Listed Building Consent - Damp proof works as detailed within design and access and, heritage statements and schedule of works at Guildhall Complex, Market Place, Hadleigh, Ipswich Suffolk IP7 5DN. It was noted that this application was submitted by Hadleigh Town Council. **Proposed by Councillor McLeod, Seconded by Councillor Bayliss, it was unanimously agreed to recommend approval on the application, and to also write to the HMC and recommend that maintenance is undertaken on the existing French Drain prior to undertaking the proposed works.**
- i) **DC/20/03622** Erection of 1no detached dwelling with associated driveway and landscaping at Frenchs Farm, Pond Hall Road, Hadleigh, Ipswich Suffolk IP7 5PQ. **Proposed by Councillor Bayliss, Seconded by Councillor McLeod, it was unanimously agreed to support the application.**



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	<p>j) DC/20/03649 Proposal: 3no Limes - Re-pollard back to previous points on a bi annual cyclical basis to negate the need for a planning application each time they need pruning at Seymour House, Angel Street, Hadleigh, Ipswich Suffolk IP7 5EY. Proposed by Councillor McLeod, Seconded by Councillor Bayliss, it was unanimously agreed to support the application.</p> <p>k) DC/20/03444 Listed Building Consent - Replace first floor window at 2 Station Road, Hadleigh, Ipswich, Suffolk IP7 5HG. Proposed by Councillor Schleip, Seconded by Councillor McLeod, it was unanimously agreed to support the application.</p>
5: Planning Decision Notices	Councillors NOTED the schedule of planning decisions made by Babergh District Council.
6. Suffolk Minerals and Waste Local Plan	Councillors NOTED the Regulation 16 Adoption Letter for the Sustainability Appraisal Post-Adoption statement for the Suffolk Minerals and Waste Local Plan
7. Babergh 5-year housing land supply statement	Proposed by Councillor McLeod, Seconded by Councillor Bayliss it was unanimously agreed to respond to Babergh District Council consultation and offer broad support for the five year housing land supply position statement for 2020.
8: National Planning Policy Consultation Planning for the Future	<p>Councillor Schleip's connection was interrupted at 8pm. She returned to the meeting and although the audio quality was poor, the meeting was able to be conducted.</p> <p>Councillors NOTED that the Government has launched a consultation on the future of town planning, and that the Town Council Manager will prepare a draft response to bring to a future meeting.</p>
9: Footpath closure	Councillors NOTED that Persimmon Homes has applied for an Extension of the temporary closure of PROW FP24 until March 2021.
10: Future Meetings	The next Planning Advisory Committee meeting was confirmed to be on Tuesday 22 nd September 2020 by video conference.
11. Close of meeting	The meeting closed at 8.06pm

Prepared by

A. McMillan

Andrew McMillan Town Council Manager

9 September 2020

Information in support of agenda items

Item 5: Schedule of decisions made by Babergh District Council

<u>Application No.</u>	<u>Address</u>	<u>Details of Application</u>	<u>Decision of Local Planning Authority</u>
DC/20/02831	Land West Of Cookson And Zinn, Pond Hall Road, Hadleigh, Suffolk	Construction of a new road access to serve the agricultural land and buildings off Pond Hall Road.	Granted
DC/20/02650	Flat 1, Hadleigh Hall Flats, Pound Lane, Hadleigh Ipswich Suffolk IP7 5EQ	Householder Planning Application - Loft Conversion	Granted
DC/20/02737	Flat 1, Hadleigh Hall Flats, Pound Lane, Hadleigh Ipswich Suffolk IP7 5EQ	Listed Building Consent - Loft Conversion and associated works as detailed within the Schedule of Works.	Granted
DC/20/03411	Tinkers Cottage, Tinkers Lane, Hadleigh, Ipswich Suffolk IP7 5NG	Notification for works to tree/s in a Conservation Area - Reduce 2no Silver Birch trees by up to 30% due to growth and proximity to property.	Does not wish to object
DC/20/02898	Deanery Lodge, Church Walk, Hadleigh, Ipswich Suffolk IP7 5ED	Householder Planning Application - Erection of a first floor rear extension, external boiler room, air source heat pump and swimming pool.	Granted
DC/20/02698	7 Bridge Street, Hadleigh, Ipswich, Suffolk IP7 6BY	Application under Section 73 of the Town and Country Planning Act - Variation of Condition 2 (Approved Plans and Documents) on planning permission DC/20/00788 - to substitute drawings 3713-1005A, 3713-1001D AND 3713-1002G with drawings 3713-1000C, 3713-1001C and 3713-1002D.	Refused
DC/20/02699	The White Hart, Bridge Street, Hadleigh, Ipswich Suffolk IP7 6DB	Discharge of Conditions Application for DC/18/04630- Condition 5 (Sample Panel of Brickwork), Condition 6 (Fenestration, Doors and Panelling), Condition 7 (Architectural Drawings), Condition 8 (Dormer Window Details) and Condition 9 (Rainwater Goods and Flues)	As per agreed conditions
DC/20/02929	34 Pykenham Way, Hadleigh, Ipswich, Suffolk IP7 5ER	Erection of front porch and windows to front elevation.	Granted
DC/20/03732	Cross Maltings Folly, High Street, Hadleigh, Ipswich Suffolk IP7 5AH	Non-Material Amendment to B/16/00322/FUL/SAS - Changes to window positions and sizes on elevations of New Wing as per drawing 1501_07_d	Approved

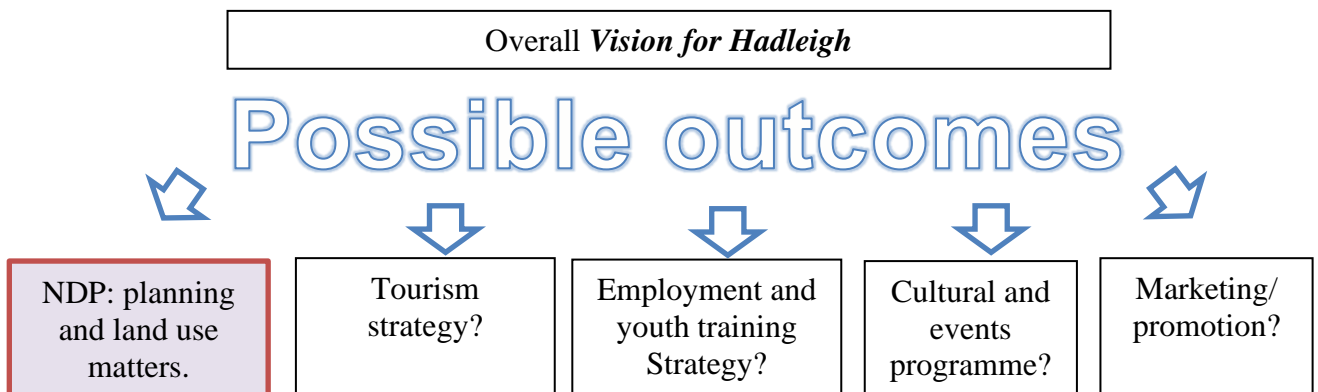
Item 6: Neighbourhood Plan Update

Hadleigh is already the focus of growth in Babergh as it is one of the larger settlements (after Sudbury and Ipswich Fringe area), so it is inevitable that a substantial increase in population is likely over the coming 20+ years. It is the job of the NDP to establish where that development should be located, influence/manage the form and design of new development, and ensure that infrastructure is provided to accompany house building. It is a genuine opportunity to shape Hadleigh positively by setting out what we want, rather than to try to influence someone else's ideas as late as a planning application stage. If the NDP is not undertaken, the District Council will do the work on our behalf, but in a more generic way that may miss the subtleties of our local ambitions. However, by developing together we are more likely to achieve what we want.

The Town Council began the Neighbourhood Development Plan (NDP) process some years ago, but it stalled. The Council is keen to revive the project, but is mindful that there has been changes in national policy and a lot of new data since the previous work was completed, and so it is likely to be necessary to review previous work. It is not starting again from scratch, but in order to be acceptable to an Inspector, it must be up to date.

One of the key areas for an NDP to be successful is for there to be an overall *vision*, or aims, objectives and ambitions for the town. A town without an aim/ambition is not going to deliver anything other than status quo. It is important that the NDP is developed to support the overall bigger picture, rather than seek to be a stand-alone document that tries to do it all. By developing the vision first, the objectives for the town's future can be agreed, and then the objectives for the NDP's part in achieving that ambition can be established. The NDP is a document written in partnership to ensure it is realistic, so HTC does not have to lead every step of the way. Fortunately, the Town Council is already committed to working with Babergh District Council and other partners around the *Hadleigh Vision* and that programme will recommence from October following Covid19 disruption.

The *Vision* is intended to explore where Hadleigh is positioned and where it would like to go in the future to cement itself as an investment opportunity for tourism, retail, employment and growth. The Vision will spawn a range of outputs, ideas and opportunities and crucially, the NDP is not expected to deliver all of the Vision – it should only focus on the parts that it can deliver, and leave other elements to other mechanisms to deliver. The NDP should therefore concentrate on the land use planning aspects of new development. For example, the NDP could decide where new houses are built, but it is not the best way to deal with marketing and promotion of the town to tourists.



Once the vision is agreed (over the coming year), the objectives can be established that the NDP must address. It is important that the NDP

- addresses the issues that matter to local people, but does not seek to do everything.
- focuses on the “gaps” in planning policy rather than replicate other plans/strategies that already do something
- is positive towards development rather than try to stop it
- is based on evidence to support its policies

- has considered options and alternatives
- has weighed up the balance of options and decided on the best solutions

It is intended by the Government that new plans should be web-based rather than paper documents, and have interactivity/graphics rather than lengthy prose. This is more complicated to deliver, but is more helpful to people trying to access planning information. It is likely that the Hadleigh plan will be dependent on the District Council to assist in this regard to ensure compatibility with its own Local Plan.

The specific future steps and timing of those steps for the NDP will become clearer as the Vision is developed, which will coincide with the revisions that the Government is making to national planning policy and process. This will ensure that our actions now are not rendered obsolete in the coming months if the planning system does change.

Item 7: “Planning For the Future” consultation

Planning For the Future DRAFT Consultation response by Hadleigh Town Council

Background

On 6th August 2020 the Housing Secretary Robert Jenrick launched consultation on Planning for the Future; a new white paper which sets out sweeping reforms to the planning system in England. These reforms aim to

- streamline and modernise the planning process by removing some of its remit,
- present design quality and sustainability as two key anchors instead of focusing on process,
- reform developer contributions,
- ensuring more land is available where needed for development (this is a key point, as Hadleigh is one of the larger settlements in Babergh, it is likely that it will be the target for much more growth than it has been in the past in order to make up the numbers).

The consultation on Planning for the Future closes on 29th October 2020. It is open to everyone, across public and private sectors as well as the general public. Responses can be made online by emailing planningforthefuture@communities.gov.uk, or writing to the Planning for the Future Consultation at MHCLG in London.

Overview

The emphasis is on ‘outcomes’, fundamentally interpreted as the numbers of homes that will be delivered, not long-term outcomes in terms of housing and places that promote well-being. It effectively returning planning to its origins of controlling land use, rather than it being seen as an overarching method of addressing social, environmental and economic matters.

Whilst the *National Planning Policy Framework* (NPPF) will stay and be representative of all ‘general planning policies’, the District Council’s *Local Plan* will need to follow a national template, and be prepared and agreed in 30 months, in consultation with local communities. New *Local Plans* will need to identify clear rules for development and classify areas into three zones:

- **GROWTH:** Areas labelled for ‘growth’ will be approved for development via an outline planning consent at the same time as local plans are prepared, allowing for new homes and infrastructure to be built ‘quickly and efficiently’, providing that local design standards are met. This is fundamentally the same as the current Local Plan “land Allocations” process such as the Lady Lane Extension.
- **RENEWAL:** Specific uses such as residential, healthcare and education in ‘Renewal’ areas will benefit from much quicker development, again if they are well-designed. This is also fundamentally the same as the current Local Plan “land Allocations”, but whereas “Growth” is about greenfield sites for wholly new development, “Renewal” sites are about changing existing places.

- **PROTECT:** Areas labelled 'Protect' will be safeguarded, and development here will need to submit a full planning application for approval – which is no different to the current system. Protect is not about stopping development but identifying characteristics that are worthy of protecting – similar to a current "Conservation Area" where development is permitted only where it is in harmony with what makes that place special.

Procedurally, plans will be developed much more quickly because some of the hoops that must be jumped through will be removed: Local Plans will no longer be required to be 'sound' or 'deliverable', and local planning authorities will no longer be bound by a duty to cooperate with neighbouring authorities. This is a significant reduction in the procedural aspects of plan-making that should result in time saving.

Section 106 agreements and the Community Infrastructure Levy (CIL) will be replaced with a new infrastructure levy which be a fixed proportion of the value of a new development, above a set threshold, which is envisioned as helping to deliver more affordable housing. It will also fund local projects such as roads, amenity spaces and subsidising a discount for first-time buyers. At the same time there is an expectation that affordable housing will be delivered 'on-site'.

The Government will give Babergh District a housing requirement target instead of Babergh calculating its own. Local planning authorities will then need to set out which land is designated to help meet this requirement. The assumption is that development will largely take place on brownfield land and within existing urban areas, but in Babergh this is unrealistic.

All homes delivered under the new planning system will need to be 'zero-carbon ready', with a requirement that all new homes are carbon neutral by 2050 and that new homes will not require retrofitting.

The reforms are also intended to help Small and Medium Enterprises (SMEs) access the housing industry, in an effort to improve diversity and competition away from large, well-established housebuilders. The promotion of SMEs and self-builders in the industry is hoped to foster greater innovation and encourage higher standards.

The use of Modern Methods of Construction (MMC) are encouraged – so house designs are likely to change from the traditional brick and tile, door and three windows, pitched roof appearance.

Consultation next steps

The Government's consultation is in the format of a series of questions published here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf.

The Town Council Manager has drafted a response for consideration by Planning Advisory Committee, which should be read in conjunction with the consultation material.

The Committee is presented with the draft response today to NOTE. Members may take the papers away to consider and make recommendations at subsequent Planning Advisory Committee meetings to the Town Council Manager who will amend the response as appropriate. The final submission to the Government will be agreed at the Planning Advisory Committee meeting on 27 October before submission to MCHLG on 29 October.

Draft HTC response to the Government

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

Underfunded, misunderstood, unfocused

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

Yes, the Town Council routinely considers planning applications, and is involved in local and national consultations on planning matters via a dedicated Planning Advisory Committee. The Town Council has started and will shortly revive a Neighbourhood Development Plan.

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?

Directly by email as is the current method

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

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

Yes, the Planning Authority should focus on the quality of each land designation (as opposed to focusing on procedure of plan-making). Zoning land alongside a schedule of policies/parameters allows flexibility, innovation and speed. The removal of Soundness/ Duty to Cooperate etc is welcome, but the energy must be put in to ensuring development is quality and attractive.

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

Not sure. Overall in principle the “basic Development Management catch-all policy tests” (such as access & parking, design quality, environmental performance etc) should be nationalised, as long as the LPA is permitted/able to adopt its own policies that add more detail where appropriate in order to avoid a standardised/national environment, without unnecessary repetition of national policy.

Yes. The LPA focusing on the form and appearance of development instead of the process of permitting it is a positive step forward.

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?

Not Sure. As a Town Council it is considered important that plans are properly made quickly, rather than years focused on procedural matters that delay adoption. As long as the new tests are streamlined and don't get bogged down in unnecessary process themselves as occurred with SA/SEA. A clear national “checklist” would greatly assist LPAs stay focused on the aspects that are required.

Yes. Having a preferred site and a suite of reserve sites approach will work as long as the control mechanisms are strong – it would not be desirable to have all sites coming forward – otherwise they would all be “plan A sites” in the first place.

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

Instead of a Duty to Cooperate whereby consensus MUST be obtained, strategic matters should be addressed through a Statement of Strategic Issues and how they are approached by the LPA – this will INFORM neighbouring bodies of the approach without having to reach an agreed approach. The

neighbouring LPA will consider the statement and act on its own approach *with* that knowledge rather than *bound* by it. It is not desirable to have a higher-level plan (Structure Plan) again as this adds unnecessary complication.

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

Yes, this will reduce Inquiry time and speed up adoption of plans – it is one of if not the most controversial matters. However, the target **MUST** be realistically achieved/deliverable and therefore not a simple single process applied to every LPA evenly: It must take in to account local circumstances including historic build rates, local economic factors etc and not put in place a target that is too high to actually deliver. A housing target figure should be stepped: a minimum delivery number, a desirable number, and a bonus number, with appropriate sanctions and rewards. If the minimum number isn't being met then reserve sites are released.

It is wrong that where there is less than 5-year supply that applications are looked on favourably in otherwise unfavourable locations. "Location A" should not be penalised for "Location B" failing to deliver a site/target. This is why reserve sites in any given location are necessary – so there are no surprises for other places when delivery is falling.

The planning system has done its job when a sound plan is made, but the developers then bend rules. Therefore when sites are not coming forward and there are no significant reasons other than the land owner/developer is not bringing the site forward, this should not result in sanctions on the planning system (i.e. relaxed policies elsewhere), but in sanctions on the land owner/developer.

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

Yes, they are important factors alongside the other factors listed to determine the quantity of development.

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

Yes, as long as the terms of the outline consent in terms of the types of uses and some details as to what would be acceptable are clear. For example, a site for "housing" could be better expressed as "up to 100 homes each with 2 parking spaces". These should be made by the LPA, not centrally.

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

No. There must also be a mechanism for locally-set policies which is not mentioned in the supporting text.

Clear criteria for what would/not be acceptable in these areas is needed to ensure community support.

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

No, blending housing and infrastructure regimes undermines the confidence in either, as it may be seen as a back-door method of securing development. Sufficient mechanisms already exist to deliver both, so it is not necessary to cross-contaminate them.

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

No, because the speed of decision-making is rarely the reason that homes are not developed. This proposal puts all the "blame" on the LPA for slow decisions, assigns it unrealistic targets and provides sanctions if targets are not met. There is no suggestion of reward for quality (too many sticks and not enough carrots). In many cases it is the applicant that has caused delay through poor quality

applications, slow response to requests for more information, non-delivery of permissions etc, but none of these proposals recognise that.

A rushed decision is rarely a quality decision. Further, an LPA will start to refuse more applications if they will run out of time – more workload for PINS (Planning Inspectorate) and less certainty for the public.

Improved validation requirements would be necessary if decision target dates become deadlines. Much of the delay is caused by the applicant not providing information up-front. If the requirement is reduced as suggested, then there will be a significant drop off in approvals.

More technology in the process will have few benefits over current working practices. Applications are already dealt with in a paperless way. The planning system is not a tick-box decision – it is judgement.

The modernisation of decision-making relies entirely on the preparation of the Local Plan and monitoring /upkeep of the data that supports decisions in a front-loaded system. This is wholly at odds with the ambition of simplifying of plan making, and the 30-month adoption target.

If the applicant is eligible for a refund of fee if an appeal is upheld, then the same reward should be available for the LPA if the appeal is dismissed.

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

Yes, simplified, map-based online plans are the best way to depict the local policies.

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

Partially. The plan-making steps are explicitly detailed in terms of minimum timeframes. However, most plans are delayed because of procedural issues. Much of the proposal is very vague, and unless there is clarity over the steps and the level of detail required at each, there is too much scope for delay as developers and objectors look for ways to derail the process due to uncertainty. But it must be realistic, and increasing local consultation is wholly at odds with faster processing time. There needs to be a much simpler, more consistent and predictable examination process rather than time limits. However, a reward for speedy adoption should be considered, together with sanctions if an LPA cannot get a plan adopted within a certain timeframe.

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

Yes. NDPs have the potential to be so powerful. There should be a much simpler mechanism for making NDPs, and more support in terms of template plans and guidance. To date, because of a lack of guidance, most NDPs simply copy or re-phrase the principal plans, and fail to allocate sites, and as such have limited value.

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?

Simplification of plan making will greatly assist in boosting local involvement – especially in NDPs. With simpler procedures combined with more guidance/templates, the impact of NDPs can be hugely boosted.

Any digital resources may be expensive and ensuring compatibility with the LPD software may be prohibitive. Communities undertaking NDPs should have direct access to the LPA software capability.

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. Ensuring permissions are implemented is more important than just approving more and more applications to replace those not coming forward. It is not appropriate to apply sanctions to the LPA for poor performance without mirroring sanctions for the market when it performs poorly.

Landowners and developers should be subject to sanctions that take in to account many factors around non-delivery such as availability of labour and materials, economic conditions etc. as long as overall those not bringing sites forward are made to do so. Sanctions can be stepped, including financial penalties and ultimately in the site ownership being transferred to the Local Authority to bring forward.

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

Aesthetically, new designs are “anywhere houses” and do not reflect our local heritage. Layouts maximise plot numbers but result in poor urban environments and fragmented streets. The basic principles in the Urban Design Compendium by English partnerships in 2000 (UDC) around corner treatment, entrances and nodes etc are not implemented and the results are weak.

House designs are standardised, bland and old fashioned. It would be nice to see more variety including some modern designs – especially in new estates where there is no neighbouring style to seek to copy. More variety is welcome. Standardised and old fashioned can be appropriate, but there is no development that balances it by being wild, daring and imaginative. There is scope for all.

“Beauty” is too bland a term to describe- the UDC sets out what “good design” means - a mix of visually attractive and operationally efficient.

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

- Less reliance on cars
- More green and open spaces
- Energy efficiency of new buildings
- More trees
- √ Other

All sustainability issues are important and need to be applied in the specific circumstances. It cannot be said that energy efficiency can be ranked against the need for open space. Both are important. The Urban Design Compendium balances these factors.

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

A cautious yes, depending on how detailed they are and how well they are enforced.

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?

Yes, with appropriate funding and powers. CABE, English Partnerships have already existed – why not use these established bodies.

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

Yes, design quality is an important factor for Homes England to consider.

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

No. At local level the codes will work, but at national level “beauty” cannot be defined, and what works in one place does not work in another. Local circumstance is key to understanding beauty – which means there can be no fast track option.

The pattern book of designs that this country has seen was the result of economies of scale, not borne out of good design. Standardising the country is not the way to achieve quality places. The national

volume house builders' portfolios of standard designs are damaging to local character, not supportive of it.

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

- More affordable housing
- More or better infrastructure (such as transport, schools, health provision)
- Design of new buildings
- More shops and/or employment space
- Green space
- √ Other

All are important factors – none trumps another.

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?

Yes, a single regime is simpler.

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

The Levy should be calculated at the finest grain possible to allow for local circumstances. However, there should be a national minimum rate as safety net.

Locations with a Neighbourhood Plan should continue to receive a percentage of the IL income.

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?

More value should be captured where there is a larger deficit in the Infrastructure Delivery Plan needs.

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

Yes. This will allow infrastructure to be delivered up-front without damaging cash-flow for the developer.

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

Yes, there is still an uplift in value from such developments that should contribute.

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?

Partly. There is a quantity aspect to AH, and a location aspect. Some sites are unsuitable for AH, so a mechanism for off-site provision should be made including availability of land and funds to develop Local Authority housing/ housing association.

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?

There should be a number of options available to allow the developer and Local Authority to be flexible towards local circumstances.

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

The LPA should be a facilitator to assist risk management during development when cashflow is problematic but should not be put at risk overall at the end of the project. There should be many options available for flexibility, none of which result in the Local Authority losing out overall.

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?

Other mechanisms exist to ensure quality (e.g. Building Regs).

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

No, the money is raised for infrastructure and should not be used as a cash-cow for other initiatives. The money raised is already low compared with infrastructure costs overall.

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

Yes, but there is a greater need for infrastructure so the ring should not be too large. ALL development needs infrastructure, but only some need AH.

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?

No.