

26 OCTOBER 2020

RESPONSE TO WHITE PAPER 'PLANNING FOR THE FUTURE' FROM LITTLE CHALFONT PARISH COUNCIL IN CHILTERN DISTRICT.

The parish council has chosen to answer those questions where we believe we have extensive local experience which will contribute to a useful response. Our selection does not mean that we regard other questions as any less important, but we are generally content to leave answering them to the local planning authority, Buckinghamshire Council – although we may not agree in every respect with the LPA, whose response we have studied.

Question 2(a). Do you get involved with planning decisions in your local area? [Yes / No]

Yes. As a parish council we review all planning applications in Little Chalfont parish, and provide recommendations to the LPA. We also engage with local residents and businesses in responding to consultations on emerging local plans.

Question 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? [Social media / Online news / Newspaper / By post / Other – please specify]

We do not agree that the proposals will make it easier to access plans and contribute to planning decisions. Better digital access is very unlikely to awaken wide public interest in the early stages of plan-making, before specific proposals are on the table. The severely limited period for public consultation, once specific proposals are published, will not allow parish and town councils adequate time to brief residents, sound grassroots opinion, and then draw up a useful council response. See details under question 5 below.

We are not sure what exactly is meant by 'visual and map-based' plans, on page 20. Maximum clarity and accessibility are of course desirable, but we would be strongly against any drift towards more 'desktop' planning - especially as the white paper proposes to centralise important aspects of the planning process. There is no substitute for direct knowledge and experience of potential sites.

Question 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]

Our three main planning priorities are: protecting Green Belt and AONB, including the environment and biodiversity, in and adjacent to our parish, where this has local public support; more and better local infrastructure; and supporting the local economy.

Question 5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

No. It is true that local plans should be simplified and produced more rapidly. However, rapid production will inevitably be accompanied by reduced public engagement, and in the white paper's proposals the balance leans too far towards the latter.

The proposed timetable for simplified plan production is unlikely to allow enough time for proper community engagement to take place. Stage 3 on page 40 of the white paper shows that community engagement is likely to be fully active only well after key decisions on sites have been made, the plan submitted to the Secretary of State, and the local planning authority has been talking for months with developers. This is, in effect, a *fait accompli*. Communities will feel as though they have not been able to influence the plan meaningfully, potentially resulting in more legal actions, with consequent delays.

Little Chalfont parish council's long experience of active engagement on local plan production shows that any consultation period, such as the present Article 18 and Article 19 consultations, needs to last at least ten weeks, not six as in the proposed Stage 3, if adequate interaction with local residents is to take place and a useful response be drawn up on their behalf.

We note the view of Buckinghamshire Council that the 'growth', 'renewal' and 'protected' categories proposed are not true zoning, but just a formalisation of what already happens or could happen, adding another layer of complexity on top of the associated masterplans and design codes necessary to provide a permission in principle. We do not feel qualified to take a firm view on this point. However, if the three zoning categories are adopted, our main concern is that green belt land should be fully and unequivocally protected within the 'protected' category, where the local public wish this to be the case.

Overall the proposal introduces further centralised power over planning. Most policies would appear to be set at national level, with little or no scope for local discretion. The proposed zoning system, coupled with the relaxation of permitted development rights, means that most control over what development happens in a locality passes to landowners and developers. Local councillors and residents would have little or no involvement once the zones had been established, in a further illustration of how the proposed new system is unacceptably tilted towards developers.

Question 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 / No / Not sure. Please provide supporting statement.

Yes, but the phrase 'consolidated test of sustainable development' sounds potentially too subjective. This test should not be subjective, but be easy to understand and agree. Also, from our local experience of a current strategic planning issue, we consider that specific tests of environmental impact should invariably be part of the test, as well as examination of the social effect of proposed major developments.

Question 8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]

Yes, provided that all constraints are satisfactorily accounted for in the method.

Question 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 / No / Not sure. Please provide supporting statement.]

No. Little Chalfont Parish Council does not agree that increasing the weighting of affordability in the standard method would produce a fair assessment of housing need, both generally and in Little Chalfont.

Location is a prime determinant of property price and therefore of affordability. House prices are high in Little Chalfont because of its location, which offers fast and efficient (although overcrowded) commuter access to London, proximity to pleasant countryside, and exceptionally good state schools.

The parish council would reject the concept that the most new houses should be built where prices are highest – a concept which clearly underlies both the changes envisaged to the standard method and the broader proposals in the White Paper – unless it is modified by recognition of constraints including Protected Land and sustainability. This is particularly important in Little Chalfont, which is surrounded by Green Belt and AONB, which need protection and should be factored into the local calculation. The parish council is very pleased to see that the White Paper proposes, on page 33, that for the first time the methodology should be adjusted for land constraints, including Green Belt. Also, the parish council considers that the existing chronic traffic congestion, lack of infrastructure, and other sustainability problems in Little Chalfont, should be taken into account in the calculation of how much new housing can reasonably be placed here. Our points in this paragraph will no doubt apply to many other semi-rural communities in the south east.

Question 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 / No / Not sure. Please provide supporting statement.]

Question 9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]

Question 9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement.]

We agree with Bucks Council's view that "The comment that it would be possible for a proposal different to the plan to come forward, in the last paragraph on page 34; seems to undermine the concept of growth, renewal and protected zones and returns us to a discretionary system".

Question 12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

See our response to question 5 above, particularly with regard to 'Stage 3' on page 40.

Question 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 – please specify]

Careful protection of Green Belt, green spaces and open spaces where this is supported by the local public.

Question 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 / Don't know / Other – please specify]

More and better infrastructure.

Enforcement

Finally, we strongly support the white paper's proposals on page 72 to strengthen **enforcement powers and sanctions**. Parish councils become closely involved in local enforcement problems, as the residents who consider themselves victims of unauthorised development often approach us first. It is very frustrating to have to tell them that delays in enforcement by the LPA are due to lack of resources and the immense time needed to resolve enforcement appeals or other legal problems. Any new measures should include the means significantly to reduce the time required for corrective action to be taken.

In this context we support Bucks Council's comments that:

"The Council would welcome changes to the consequences of breaching Temporary Stop Notices, Stop Notices and Breach of Condition Notices to include the taking of direct action (as per breaches of enforcement notices and S215 Notices) and the fast-tracking of prosecution action. " and

"We would also welcome improved joint working with other statutory bodies (e.g. the Environment Agency) whereby breaches of planning control are afforded priority such that the Council is able to take swift action with the full support of that agency. "
