

# Planning for the future

## Alton Town Council's response

This consultation closes at  
**11:45pm on 29 October 2020**

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### Pillar One – Planning for development

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

- Complex
- Extensive
- Slow

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

- Yes, as a statutory consultee for all planning applications in the town of Alton, which lies within East Hampshire.

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?

- A digitised system should make it easier to access relevant information more efficiently, and to see the broader picture more easily. However many of the people in our area are elderly or disadvantaged and so other means of communication will still be needed if the process is to be inclusive. There does appear to be a lot of emphasis in the proposals for improving the technology behind the process and assuming that this will give a better result. Experience indicates that technology projects do not always run smoothly and deliver the promised benefits. A backup "Plan B" would be reassuring.

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

- Planning to limit climate change and to cope with the effects of climate change that cannot be avoided.
- Growing in a way that is sustainable and meets all the needs of a healthy and thriving community.
- Maintaining biodiversity and a pleasant environment.

**Proposal 1: The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected.**

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

- Yes, as a starting point. However more detail is required to define these categories. Developments in one area impact on surrounding areas, not least in regard to infrastructure provision and flooding risk. Some types of development may be appropriate in areas where other types of development are not appropriate.

**Proposal 2: Development management policies established at national scale and an altered role for Local Plans.**

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

- Some aspects of a local plan are not specific to a locality and can be better covered by national policies that are widely understood. But if local democracy is to have meaning in the development of local communities there must be scope for augmenting national policies with local policies. For example Alton has conservation areas and architectural styles that are important in defining the identity of the area. East Hampshire has a high level of car ownership, at least in part because of the very limited public transport provision. Inadequate off-street parking has created congestion problems in residential streets and the Alton Neighbourhood Plan and the East Hampshire Local Plan have tried to alleviate this in new developments by insisting on more off-street parking provision. Another local problem for Alton is flooding and strong policies to protect neighbouring properties from run-off from new developments are essential.
- When it comes to the provision of both infrastructure and social services there is a chicken and egg situation between providing them and development, particularly with regard to housing development. The two aspects cannot be totally separated.

**Proposal 3: Local Plans should be subject to a single statutory “sustainable development” test, replacing the existing tests of soundness.**

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?

- The conditions that must be met have to be specified and precise. Environmental protection must not be watered down. Since almost any development has some environmental impact (in some cases beneficial) regulations would need to define the limit of acceptability. Measures that reduce duplication of effort and bring greater clarity to decision making are welcome.

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

- We live in a society that is highly mobile and, in addition to human movement, there are also impacts on neighbouring communities regarding noise (particularly from aviation), water and sewage, refuse disposal, energy supplies, and freight movement. Some formal level of coordination is essential, and if the duty to cooperate is removed then something else will be needed.

**Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.**

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

- Yes, in principle this is a good starting point. Practical constraints, including the existence of National Parks and the availability of land in an area have to be considered.
- Provision for Traveller sites is an issue that appears to be lacking in the proposals currently before us.

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?

- No, affordability is a poor indicator of housing need. The balance between house prices and average earnings needs to be looked at over a “travel to work” region as a large portion of the UK workforce has, for over 100 years, commuted across local authority boundaries and is happy to continue to do so. Looking at how the affordability ratio has changed over (say) the last 10 years is a better measure of housing shortage than the absolute affordability ratio. Affordability has been given too much weight in the government’s proposals. More weight should revert to the baseline numbers.

**Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.**

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?

- This is dependent on having an adequate policy framework surrounding such developments. Developments must fit in with developments across the area, including architectural style, protection of the environment, limitation of impact on neighbouring communities, and consistency with local planning objectives.

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

- Our concerns here are similar to those stated in question 9(a).

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

- Only where the new settlement is compliant with an up to date Local Plan.

**Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology.**

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

- Yes, but it is not always the LPA that is the cause of delays to determination of planning applications and any requirements introduced should be on both sides, the LPA and the applicant. Often delays are caused by the need to get further information from the applicant, to answer issues raised by consultation responses or the case officer.
- There should also be flexibility built into the system.

**Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.**

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

- Yes. We support accessible, web based Local Plans, standardised across councils.
- There must be time allowed to transition to a new system, with adequate training.

**Proposal 8: Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so.**

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

- Yes as a target, but with some flexibility. This should not become a statutory limit until the system has been tested.

**Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools.**

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

- Yes. Alton was an early adopter of a Neighbourhood Plan and invested a lot of effort into the associated research. However it is essential that the future role and influence of a Neighbourhood Plan is defined, and that an appropriate process is devised for establishing a Neighbourhood Plan. Having voted for a NP in a referendum people feel that it should be given more weight than currently appears to be the case. The proposals in "Planning for the Future" are very vague on the subject and clarity is urgently needed. It is also important to understand how long a Neighbourhood Plan remains valid.
- The overall proposed changes to the planning system appear to reduce the role of local democracy. A reinvigorated Neighbourhood Plan process could help to renew the sense of community involvement, but this mood could rapidly turn to disillusionment if the NP did not appear to be playing an active role in decision making.

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?

- The remit of Neighbourhood plans needs to be made clear with guidance on what they can and cannot do. It should not duplicate or overlap with the Local Plan because this destroys

clarity and leads to broken expectations. They need to be produced within the same technological envelope as the Local Plan to ensure that they are compatible and equally accessible. NP groups will therefore require adequate resource to produce fit for purpose plans.

**Proposal 10: A stronger emphasis on build out through planning.**

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. Failure to proceed in a timely fashion disrupts the wider development plans of an LPA. This problem is entirely within the control of the developer. Planning permission could be time limited so that if a developer did not proceed in a timely manner could be forced to reapply for planning permission from scratch with no presumed developer rights. There could also be financial penalties.

**Pillar Two – Planning for beautiful and sustainable places**

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

- Often disappointing.

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

- Combating climate change is our top priority. Alton Town Council, East Hampshire District Council and Hampshire County Council have all declared a climate emergency. Recognising that energy loss from buildings is a large part of the problem in the UK, we are very disappointed that the current regime does not allow us to specify much better energy efficiency in all new buildings. It is much easier and cheaper to build in energy efficiency than to retrofit it. And yet gas central heating boilers are going in to nearly all the new buildings currently under construction or which hold detailed planning permission.
- Travel and transport is also difficult for people without cars in this area. We want to see as much new development as possible built in a way that is not car dependent. Adequate off-street parking is needed for the number of cars that will inevitably be owned by future residents.
- Flooding is a major problem, mostly from surface water running off the surrounding hills, but also from rising water tables. New developments must be built in a way that protects both their inhabitants and the surrounding properties.
- Although located just outside the South Downs National Park, tourism is important to the local economy. The beauty of the surrounding countryside is essential for both the quality of life of the town's population and the tourism industry.
- Developing a sense of local history and identity is also a crucial part of our vision for the town.

**Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.**

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

- Yes, the preparation of design guidance with local community involvement is supported. The different routes for preparing this guidance are also endorsed, subject to the provision through the Government's planning practice guidance of appropriate details for how the views of local communities are to be integrated, when design codes and guides are being prepared by others. The Government should make clear that limited consultation on drafts of emerging codes/guides will not be sufficient, but that early engagement including by digital means should be undertaken by local planning authorities and developers.
- In the case of neighbourhood planning, funding should be made available to enable local communities to access expert advice and guidance from design professionals (urban designers or architects). It will be important that local communities are able to access this expertise, to ensure that their emerging guidance will effectively illustrate their design preferences. Appropriate illustrations would provide certainty for developers and comfort for local communities that their ideas can be implemented. Some local planning authorities may be able to supply such advice and guidance, but this cannot be assumed, either due to a lack of staff resources or the presence of competing demands on staff time. It will also be important to make clear that local design codes should be based on a strong vision for new development that is relevant to the locality, such as articulated through local plans and any relevant masterplans.
- In summary, specific guidance for the preparation of design codes via the differing routes needs to be made available, whilst funding needs to be in place to ensure that local communities have access to professional design expertise. Care needs to be taken that design codes do not become formulaic and detached from an evidence-based vision for new development within the area.

**Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.**

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, it will be important to support the increased emphasis on urban design within the planning system through the establishment of bodies and roles that can champion good design. It is important that the intended re-focusing of professional skills within the planning system enables local authority planning officers to access suitable training and support.

**Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.**

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

- Yes, it is important to consider how support for high-quality design can be manifested in Homes England's activities, in relation to land disposal and bringing forward sites for development. It is not clear from the Planning White Paper what the options would be for increasing this focus, but measures that direct Homes England to consider "value for money" from the perspective of what local communities would value from a development are

welcome. This includes a consideration of how new development on a site would function as part of the wider area, which is strongly influenced by its design and layout.

**Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.**

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

- A qualified 'yes' to two of the proposals, a 'no' to the remaining one.
- The proposal for revising the NPPF to give code-compliant schemes a "positive advantage" have merit but should be tempered so that revisions do not result in unsustainable development. One of the virtues of the current planning system is the ability of decision-makers to react to emerging material considerations that were not in evidence at the plan-making stage. The ability to attribute significant weight to "other material considerations" helps in this regard. The fact that a proposal is code compliant should not mean that potentially adverse impacts on the natural environment may not be given greater weight in determining the detailed design of new development.
- The proposal for requiring a masterplan and site-specific code as a condition of the permission in principle that would be granted by a new-style local plan is welcomed. To achieve the Government's ambition for the timescale over which local plans are prepared (30 months) it is unlikely that more than a 'co-ordinating code' could be included within a local plan; and the simultaneous preparation of multiple detailed design codes for different growth areas would likely entail a lot of work. This proposal would only deliver benefits if the Government were to support the enhanced focus on design with professional training for planners and access to expert support.
- The proposal for pre-approving popular and replicable designs through permitted development rights is not supported. Whilst there are similarities in urban morphology and architectural vernacular between areas and settlements of England, which translate into similarities of local character, there are also important differences. Omitting consideration of these differences, such as would be necessary through prescribing nationally replicable designs, threatens local distinctiveness and regional variations that comprise some of the beauty and heritage of England. The suggested approach also neglects the fact that good design starts from an appreciation of local context: what is good in a town centre may not be good in an edge of settlement location, and an appreciation of local topography, landscape, street design, block and plot configuration is often important. There are likely to be many areas where pre-approved designs would be suitable, but these areas should be identified locally and the pre-approved designs should also be subject to local scrutiny – such as is proposed in the White Paper through the production of locally endorsed design codes. This proposal for using permitted development rights to grant permission for "off the shelf" designs appears to conflict with the Government's support for binding local design codes.

## **Pillar Three – Planning for infrastructure and connected places**

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

- The full range of infrastructure services: education, medical services, transport, policing, social services, utilities, play areas, recreation and sports needs to be reviewed and augmented as necessary. There is a widespread belief that previous development has not been accompanied by adequate infrastructure provision. However there will still be widespread opposition to development even if infrastructure needs are fully met.

**Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.**

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. Having one consolidated levy would simplify processes.

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

- A standard approach across an area or nationally is a simpler system, making the planning system more understandable.

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. The current system does not provide enough money to fund all the infrastructure required and hence the deficit in provision that we see with current development.

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

- Yes. At times infrastructure is needed at an earlier phase than can be funded. Borrowing would allow infrastructure to be delivered earlier, in line with local aspirations.

**Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights.**

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

- Yes, particularly if housing is being provided, it should make a fair contribution towards infrastructure.
- Through permitted development rights many more homes can be provided in an area putting pressure on existing infrastructure. Without a contribution, infrastructure will not be able to keep pace with development and will always be in deficit. Adequate infrastructure is a central part of place making and the current system is letting our local communities down by letting permitted development off the hook.
- Note, currently Traveller accommodation is exempt from CIL, even when permanent accommodation is being provided. A mechanism for such accommodation to pay CIL could be considered. In many areas, provision of permanent pitches is viable and valuable, and as

such, could afford to contribute, as the accommodation is requiring the same of local infrastructure (e.g. health, education) as other housing.

**Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision.**

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?

- Yes
- It is critical in places such as East Hampshire to secure at least the same amount of affordable housing on site as at present. Without on-site provision it is extremely difficult to find land for affordable housing. Without securing at least the same level of on-site provision will undermine the delivery of affordable housing and fail to meet housing needs, in turn making housing even more unaffordable.

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?

- Affordable housing should be secured as an in-kind payment towards the infrastructure levy.

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

- Yes, all risks to a local authority should be mitigated against in the public interest.

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?

- In kind affordable housing must be fully policy compliant meeting all standards set, with a housing provider willing to purchase. National policy should set out key criteria for affordable housing e.g., standards, pepper potted, space standards etc.

**Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy.**

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

- Yes, although infrastructure spending should continue to be the main recipient.

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

- No
- Local authorities should be able to continue to identify the right balance between infrastructure and affordable housing to meet local needs, as they do at present. This may not only vary from county to county and across districts but there are nuances within districts too and where more affordable housing on site could be appropriate in one location, it might be less appropriate in another part of the district.

## What happens next

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?

- The proposals do not refer or consider in any way the needs of the gypsy, traveller and travelling showpeople communities or consider their rights under the Equality Act 2020. A clear strategy from Government for addressing this that seeks to provide more, higher quality, better integrated accommodation is needed. All councils need to be made to take responsibility and provide accommodation, including affordable accommodation.