



Planning for the Future consultation

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Friends of South Hams - Representation.

A key part of this consultation is to seek engagement from a wide range of people on the proposed changes to the current planning system.

The 'Friends of South Hams' are a community group who effectively campaign to protect the South Hams and its countryside, in particular, the South Devon Area of Outstanding Natural Beauty, and to ensure that development is appropriate, in the right place, so that it benefits the local community and visitors.

The range of proposals contained in the 'Planning for the Future' and 'Changes to the Existing Planning System' consultations are aimed at significantly increasing the number of homes that would be built in the South Hams.

We note that no evidence has been presented by the Government that a higher level of housebuilding will have the intended outcome of reducing average house prices in our area, still less that there will be any benefit for existing residents trying to step onto or climb the housing ladder.

The two current consultations have nothing substantial to say about the national climate emergency or impact on creating a greener environment.

Our submission to the related 'Changes to the Existing Planning System' consultation is attached (Annex 1.)



Planning for the Future Consultation

Pillar One – Planning for Development

Q1. What three words do you associate most with the planning system in England?

1.1 'Protects' – 'Public 'Interest'

Q2. Do you get involved with planning decisions in your local area?

2.1 Yes

Q3. How would you like to find out about plans and planning proposals in the future?

3.1 Other: A mix of all appropriate media to ensure full democratic involvement by the community. We do not believe these proposals will make it easier for people to contribute their views to planning decisions since the reforms propose to remove the key submission stage of the planning process when applications are subject to public consultation and decided by the local planning authority. Only 'protected' areas would appear to retain an open consultation period.

Q4. What are your top three priorities for planning in your local area?

4.1 Increasing the affordability of housing

4.2 The environment, biodiversity and action on climate change

4.3 Other: Democratic, accountable, transparent decision making. Communities have a right to participate in plans and decisions on planning proposals. The planning system should serve the public interest, not favour one sector, such as a landowner or developer.

Q5. Do you agree that Local Plans should be simplified in line with our proposals?

5.1 No.

5.2 We believe that removing the opportunity for the community to comment at the outline planning application stage on sites allocated for growth in plans will reduce the



communities' input into planning proposals affecting their areas, and significantly reduce local democracy.

5.3 To deliver new homes while meeting objectives for healthy, resilient communities, the net-zero carbon 2050 target, wildlife and the natural environment, Local Plan policies must be both detailed and tailored to the needs of the South Hams

5.4 Conferring a 'permission in principle' or 'presumption in favour of development' within growth and renewal areas risks leaving only the 'protected areas' with a fully functioning system of planning and development control.

5.5 It is proposed to have community-led housing developments in growth areas. We believe that community-led development should happen more widely, not just in areas envisaged for growth and not just for housing.

5.6 We believe that local authorities should retain the same level of flexibility to set development management policies as under the current Local Plans system and not be restricted in this as the consultation paper proposes. In our view, this should be supported by a strengthened National Planning Policy Framework (NPPF) which empowers, rather than restricts, planning authorities and communities to manage development in their area in line with local needs and in a way which responds effectively to the climate and ecological crises.

5.7 We are also concerned about the loss of local democracy in the identification of growth areas. Significant amounts of technical work will be needed at the plan-making stage if site allocations are to have automatic outline planning permission. Proposals may require Environmental Impact as well as Strategic Environmental Assessment.

5.8 There is no indication of whether minerals and waste planning are to be included within the new approach or whether they should continue to be planned for separately. Minerals, in particular, have to be worked where they are found, which does not fit easily within the three zoning categories proposed.

Q6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

6.1 No.



6.2 These proposals would take away control from local communities and the councils who support them. Local Plan policies have to be detailed and tailored to local circumstances, to meet objectives on climate change, the natural environment, green space, local economy and affordable housing.

6.3 The White Paper proposals to reduce the development management function outside protected areas. This will mean local people and elected councillors will have less say over what development takes place. This is anti-democratic.

6.4 In our opinion, automatic digital screening is not yet a substitute for human judgment for many planning matters which require careful consideration and appraisal. We would be concerned that such an approach could lead to the approval of schemes without appropriate scrutiny.

6.5 Planning decisions often involve the use of professional judgement and local knowledge to assess and weigh up the material factors in a case and are rarely just a simple decision about whether it aligns with policy or not. Many proposals have the potential to impact on protected areas and heritage assets and their setting.

6.6 One of the reasons for repeating national policy in local plans is that the legislative weight of the development plan does not apply currently to national policy. We recognised that the proposals would reduce some duplication and help to make plans shorter but, there will be situations when a local policy approach is important.

Q7 It is proposed that the sustainability appraisal would be abolished and replaced with a simplified process. The Duty to Cooperate will be removed, and there will be a slimmed-down deliverability test at an examination.

7.1 We believe that any replacement appraisal must be robust and focused on achieving positive outcomes for promoting sustainable development. Removal of the Duty to Cooperate has delayed plan-making and has not worked to achieve housing numbers. There still needs to be strategic planning to make decisions about where growth and infrastructure should be focused, and how cross-boundary issues will be addressed.



Q7(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?

7.2 No.

7.3 The proposal is for a single statutory ‘sustainable development’ test to ensure plans strike the right balance between environmental, social and economic objectives”. We believe that sustainable development should be about integrating environmental, economic and social objectives. In our view, there will still be a need for a Strategic Environmental Assessment of plans.

7.4 We believe that Local and Neighbourhood Plans should continue to be subject to Strategic Environmental Assessment. National planning policy should undergo Strategic Environmental Assessment or a similar exercise, to ensure environmental effects are appraised and alternatives considered and subject to public consultation.

Q7. (b) How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

7.5 Through a locally accountable, democratic, strategic planning tier. Currently, this is only available in those parts of the country where an elected mayor or combined authority has planning powers or authorities choose to work together strategically.

Q8. (a) Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

8.1 No

8.2 Binding targets dictated by the central government would remove any debate about housing targets from local plan examinations, and would also remove the current requirement to consider unmet housing need from adjoining areas, under the ‘duty to cooperate’. However, it would also remove informed local democratic input into the housing number for the area.

8.3 There is no detail in the proposals as to how the housing numbers figures would be worked out or how environmental constraints would be considered. We believe this is of



particular importance to the South Hams where development can have significant adverse impacts on highly sensitive landscapes, internationally protected areas, nature conservation sites, the South Devon Area of Outstanding Natural Beauty, and the designated coast.

8.4 We believe that the distribution of development must be based not only on data but also on an agreed strategy for how areas should grow and the infrastructure needed to support them.

8.5 We firmly believe that planning for housing is best done locally, in light of local needs, aspirations and different places capacity to accommodate development. Areas with the greatest affordability constraints, where house prices are most expensive compared with incomes, are not necessarily the most sustainable locations to develop, yet under the proposed approach they would have to plan for more homes than otherwise.

8.6 It is our view that the housing calculation should provide clarity about the type of homes required for different groups drawing on local evidence and any planning system changes should place greater responsibility on developers to contribute fairly towards meeting housing needs by removing current 'viability' and other loopholes.

8.7 The housing delivery test appears to penalise local authorities. They cannot force developers to build on land which has planning permission. It is also of great concern to us that the presumption in favour of sustainable development would become more like a presumption in favour of development. We believe that these aspects of the planning system should work to the wider public benefit, rather than in favour of the development industry.

Q8. (b) Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

8.8 No.

8.9 The capacity of places to accommodate sustainable development should be the primary objective. Simply building more homes won't make them more 'affordable' as developers are unlikely to supply the market to a level that would make house prices fall. The quantity of development planned for should be based upon an assessment of local need and places capacity to accommodate development sustainably.



Q9 (a). Do you agree that there should be automatic permission in principle for areas for substantial development (Growth areas) with faster routes for detailed consent?

9.1 No.

9.2 We believe there should be no automatic permission granted, especially not for 'substantial development'. These developments require more scrutiny of proposals, not less.

9.3 Development proposals should continue to be decided by way of a planning application. The planning application process provides for democratic public scrutiny. This is a prerequisite for robust, fair planning outcomes. Under automatic permission in principle, this stage would be omitted and therefore the procedure for approval would be less fair, and potentially less rigorous. It is doubtful whether a streamlined system is achievable in practice without compromising the quality of developments coming forward and the community involvement in planning.

Q9(b). Do you agree with our proposals for the consent arrangements for Renewal and Protected areas?

9.4 No.

9.5 It is our view that the planning application process provides for public, democratic scrutiny. This is a prerequisite for robust, transparent and fair planning outcomes and should be retained. For renewal areas, a presumption in favour of development would apply and therefore it is not clear that provision for the same level of public, democratic scrutiny by way of a planning application as we have now would continue.

9.6 This stage must be retained and enhanced to ensure at least the level of scrutiny and public participation in decisions remains as under the present arrangements. Without these safeguards, the procedures for approval under the reforms risk being less fair, and less rigorous.

9.7 Removing the opportunity for people to comment at the outline application stage would reduce local democratic involvement. While 'front-loading' of this engagement at plan-making stage is proposed, this would be very difficult to achieve within the restricted timescale set out for local plan preparation.



9.8 Where a departure from the plan was proposed by a developer, a full planning application process would be required and this would be decided based on consideration of national planning policy. There is a significant lack of detail about how this process would work. What level of departure from the Local Plan would require a planning application? Would there be a right of appeal? The reliance on national planning policy involves further centralisation of the planning system, removing local democracy from the decision-making process.

9.9 Decisions on new settlements could be made by the Nationally Significant Infrastructure Projects regime, rather than locally. If a local authority supports the delivery of a new community within its area, decisions about its form and design should be managed locally. Changing this to a national decision further removes local democracy from the process.

Q9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

9.1.1 No.

9.1.2 New settlements should be seen as a last resort after all other options, such as redevelopment and urban extensions have been considered and exhausted first. Planning should remain in the hands of democratically elected authorities.

Q10. Do you agree with our proposals to make decision-making faster and more certain?

10. No.

10.1 The amount of information required to assess a scheme will depend on its size and complexity and impacts so it is important that in any move to standardise documents these are taken into account. For larger schemes, such detail is needed due to the complexity and impacts of such proposals.

10.2 We object to the consultation paper's suggestion that detailed planning decisions be delegated to planning officers where the principle of development has been established. Public participation and democratic scrutiny are integral to our current system and necessary for decisions to be fair, transparent and robust. Under the reformed system as proposed the democratic scrutiny and public participation that occurs with specific planning



proposals — a key feature of the current system would be lost. We do not believe this is acceptable.

Q11. Do you agree with our proposals for digitised, web-based Local Plans?

11. Concerning the proposal for greater digitalisation of the application process to make it easier for applicants, it is important that any automation of the process be restricted to routine, simple elements and should not substitute for human judgment or replace the need for public participation and deliberation by way of a development planning committee.

11.1 Planning decisions often involve consideration of complex interrelated matters which cannot be dealt with by a consideration of rules. There is a need to weigh up the benefits of a proposal against the harm. Often the detail of any harm can be complex and therefore limiting justification for a proposal to 50 pages and standardising technical information runs the risk of removing the ability for full consideration of issues. Standard national conditions do not necessarily reflect local issues and the preferred local way of addressing them.

11.2 Greater use of digital technologies is needed, however face-to-face communication, in-person events and access to hard copy documentation also matter. In-person events provide for a level of engagement and discussion that may not be achievable through digital technologies. Both types of communication are needed.

Q12. Do you agree with our proposals for a 30 – month statutory timescale for the production of Local Plans?

12. We disagree with the simplified role envisaged for Local Plans and Neighbourhood Plans. These should continue to set out detailed policies tailored to the circumstances and opportunities of the local area.

12.1 The greater reliance on digital means of communication will potentially disadvantage older people, those in deprived areas and those with certain disabilities. Standardisation of local plans also removes the potential for local innovation and distinctiveness.

12.2 All areas must have and maintain up-to-date Local Plans to guide decisions on new development. This should be achievable in a period of two and a half to three years, subject to planning departments and the Planning Inspectorate having the necessary resources to work to this swifter timescale. The 20% reduction in planning resources that has happened during the last ten years would have to be reversed.



12.3 We are also concerned that, under ‘alternative options’ the possibility of removing the ‘right to be heard’ is mentioned. Maintaining the right to be heard is essential if communities are to retain a meaningful influence and role in plan-making. This right enables individuals and groups to engage in person alongside other stakeholders and provides for thorough public scrutiny of policies, evidence and proposals. The deliberation and discussion that occurs at examinations in public help foster consensus and ultimately leads to better thought out plans and policies.

12.4 The proposed restricted timescale would severely limit the front-loading of community engagement that could take place. Significantly more technical evidence would be needed to support a local plan if its proposals were to be granted automatic outline permission, and this would also be difficult to achieve within the indicated timescale.

Q13. (a) Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

13. Yes.

13.1 Neighbourhood Plans have a role to play in setting local policies tailored to the needs of their neighbourhood and can foster community ownership of and engagement with planning. We believe the role of Neighbourhood Plans should continue as now or be enhanced, not restricted in the manner the reforms propose.

Q13. (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?

13.2 By empowering communities to draw up Neighbourhood Plan policies that require development to be zero carbon, nature friendly and meet requirements for affordable housing, workspaces, community facilities and other land use needs, in particular community-led schemes and initiatives. The design preferences of the community should be reflected in the Neighbourhood Plan where communities would like this, but so should these broader planning considerations which should continue to be integral to the Neighbourhood Plan process rather than omitted or constrained along the lines the consultation paper proposes.



13.3 We think it would be important to clarify the community's role in the zoning system proposed for local plans, including whether they would be able to change zoning or whether they would be focused on local design codes. Neighbourhood plan groups would need support in developing more digital approaches.

Q14. Do you agree there should be a stronger emphasis on the build-out of developments? And if so, what further measures would you support?

14. Yes.

14.1 Measures to address excessive land banking are needed. Developers should be required to implement the planning permissions they already have and measures identified to achieve faster build-out of developments where needed.

14.2 While the variety of development types within a site is one of the factors that can affect delivery, there are others, including market absorption rates and the reliance on the development sector for infrastructure provision. Delays in house building nationally are not all due to the planning system. We suggest that the recommendations in the Letwin Report, which address this contentious issue, are reconsidered.

Pillar 2: planning for beautiful and sustainable places

Q15. What do you think about the new development that has happened recently in your area?

15. We believe that by engaging in the planning process, particularly at the application consultation stage, that the Friends of South Hams and the local community have succeeded in helping to ensure that the right developments have been built in the right places and that inappropriate proposals, which would have harmed the sensitive and designated landscapes in the South Hams have been, in many instances, avoided. In other cases, we have contributed to the improvement of developments, in the public interest.

Q16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

16. Very little new development is truly sustainable, or are zero-carbon, nature friendly with sufficient affordable housing and workspace, accessible green space served primarily by



public transport, walking and cycling. New housing developments are often delivered on the outskirts of our towns and villages, served by private cars, with limited provision of new green space, integration with public rights of way, cycle paths etc. This has to change if the government is serious about tackling the climate and ecological emergency and planning for green, and socially fair post-COVID and Brexit recovery.

Q17. Do you agree with our proposals for improving the production and use of design guides and codes?

17. The increased emphasis on design quality is welcome. Design codes can, however, be a relatively inflexible means of achieving quality, and master-planning requires the consideration of a wide range of factors other than appearance – in particular, the practicalities of development, such as the timing of infrastructure provision, mitigation against potential harm to protected landscapes, coastlines or heritage assets. These are often the matters over which a great deal of time and evidence is required before balanced decisions can be made.

17.1 We believe local design codes will be important to ensure that local character and context is reflected in new development but will require significant resourcing and training. The preparation of design codes and masterplans, particularly bearing in mind the importance of community engagement in the process, will take time, not necessarily making the system faster as envisaged in the proposals. Design codes need to include the design and management of green space and the public realm, not only the design of buildings.

17.2 Greater use of design guides and codes could potentially play a helpful role, depending on what they contain and the extent to which development follows the guidelines set out. Such guides and codes should have a sustainable design, energy efficiency and sustainable transport embedded within them, including maximum parking standards, cycle storage, charging points, and so on.

17.3 Codes may have some potential to help secure better-designed development, but need to be seen within the broader context of planning impacts and wider objectives such as the climate and ecological crises and need for a fair, green recovery. For example, allowing major new housing development on greenfield sites on the edge of our towns and villages makes a transition to more sustainable transport modes harder to achieve; as reliance on the private car is embedded as a necessity from the outset. This in turn leads to houses with no front gardens but parking spaces, leaving little or no room for trees, nature or greenery.



Q18. 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?

18. Not sure.

18.1 Concerning setting up a new body to support design coding, without further information on the nature of such a body and powers they are to be given, it is not possible to answer this question.

18.2 We believe it would be helpful for local authorities to have a chief planning officer, given the crucial role of planning in managing the development and land use in the public interest. Design and place-making are fundamental to good planning outcomes. Greater emphasis needs to be placed on planning for zero-carbon, resilient development and ensuring we have a planning system enabled and properly resourced at a local level to deliver this.

Q19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

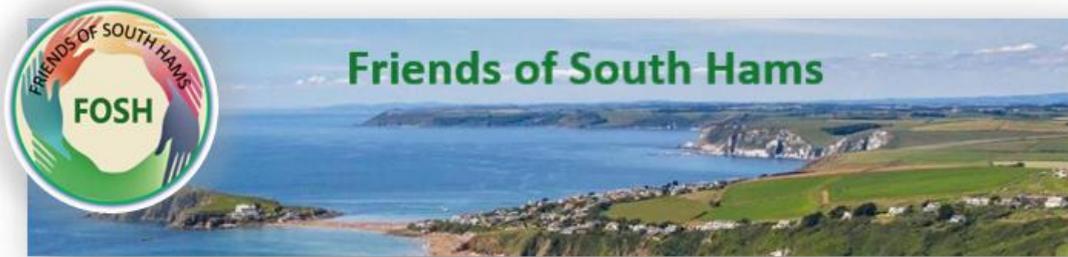
19. Yes.

19.1 Measures to embed design quality and environmental standards in Homes England's activities and programmes of work would be welcome.

Q20. Do you agree with our proposals for implementing a fast-track for beauty?

20. No.

20.1 While good design matters, many factors determine whether a development is sustainable in terms of impact on the environment and the host community. A fast track process would not be subject to the level of scrutiny required to fully assess the impacts of a proposal.



20.2 A 'beautiful' development is not necessarily a sustainable one, and that should be a minimum requisite (to include zero-carbon, nature friendly), along with compliance with Local Plan policies, for any 'fast track' process. Ideally, community-led or with community consensus.

20.3 There is a risk that the use of pattern books or replication of popular designs will reduce local distinctiveness and result in greater homogeneity of developments. A more fundamental concern is that a development that is considered beautiful may not adequately provide the other elements of placemaking such as infrastructure delivery or biodiversity mitigation but may qualify for 'fast track for beauty'.

Pillar 3: planning for infrastructure and connected places

Q21. When new development happens in your area, what is your priority for what comes with it?

21. We need more affordable homes, better access to green space, and protection and enhancement of existing green space, sustainable infrastructure with priority given to making provision for walking, cycling and public transport, local shops and employment areas as well as space for leisure, recreation and community uses.

21.1 New development should be well designed as a matter of course, achieving high standards of energy and water efficiency, zero-carbon, with good access to nearby green space and local facilities.

Q22. (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?

22. No.

22.1 We are concerned that the proposals, as drafted, may lead to a reduction in the number of affordable housing developers provide.



Q22. (b) Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

22..2 Set locally.

Q22. (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?

22.3 It should aim to capture more value.

22.4 The overall aim should be to secure a greater proportion of the uplift in land value to support greater investment in sustainable infrastructure, affordable housing and local community facilities.

Q22. (d) Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

22.5 Yes.

22.6 The simplification of this system could reduce some of the time and effort of negotiation, but the method of working it out would be critical, in particular about the amount of funding that would be secured. Community Infrastructure Levy payments cover only a fraction of the cost of the total infrastructure required, and affordable housing provided through development is limited by viability. The new levy payments would continue to be based on development viability, as they are proposed to be based on a proportion of development proceeds above a certain level, so, it is likely, they will still not provide sufficient funding for all the infrastructure required.

22.7 Also, in areas where development viability was more favourable, a higher levy would be paid. This would result in a disproportionate amount of the levy being collected in some areas but no mechanism is suggested to redistribute this to areas where infrastructure need is greatest or where development is less viable (and consequently levy receipts are lower).



22.8 Section 106 agreements are used not only for securing funding but for in-kind provision and land transfers: it is not clear how these would be achieved under the proposed changes. Their purpose enables development to come forward that would otherwise be unacceptable.

22.9 Allowing for local variation is important to maximise the potential gain from development in the more viable areas and avoid blocking it in the less viable areas, though setting the rates nationally would reduce the burden on local authorities. Many existing development allocations, where land value has already been set, may be unable to accommodate these changes. Payment of the new levy would be due on the occupation of the properties. Contributions payable at the end of the development process may help cashflow but might delay the delivery of important prerequisites. The infrastructure levy must be compliant with the Habitats Regulations where it is being used to provide mitigation for potentially adverse impacts on protected habitats. Payment on the occupation of properties is not likely to be sufficient if the harm has taken place at the start of building

Q23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

23. Yes.

23.1 We believe this would increase the levy base and mean that office to residential and agricultural conversions were contributing towards affordable housing.

23.2 It is unfair that development delivered as a result of exercising permitted development rights can sidestep local policy requirements, development impacts and community need for private gain.

23.3 Evidence from academics, sector representatives and the government commissioned research highlights the poor planning outcomes of homes delivered through Permitted Development Rights. Shortcomings include poor design; failing to meet basic space standards; poor residential amenity; lack of affordable housing contributions; impact on business; and lack of infrastructure. The best way to ensure the level of scrutiny required to address these unacceptable impacts on our environment, health and wellbeing are to require a planning application and scrap Permitted Development Rights other than for very minor development.



Q24. (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?

24. No – We need more

24.1 We need to plan for the delivery of more affordable homes than we do at present. This requires developers to provide more by way of planning obligations and higher levels of direct public investment.

24.2 Loopholes that allow developers to avoid providing affordable housing or reduce the amount they provide on spurious grounds of 'viability' or as a result of exercising permitted development rights, must be closed.

24.3 Provision of affordable housing should be made a mandatory requirement that developers and landowners factor in from the outset when devising schemes and remain committed to on delivery.

24.4 The government should look at increasing overall affordable housing requirements through planning obligations. Therefore, it makes no sense to reduce requirements for small and medium-size housebuilders, as the government is proposing (see the Friends of South Hams separate consultation representation about 'Changes to the Current Planning System' – Annex 1.).

Q24. (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?

24.5 Affordable housing should be provided on-site, to deliver mixed tenure communities where possible.

Q24. (c) If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

24.6 No comment.



Q24. (d) If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

24.7 No comment.

Q25. Should local authorities have fewer restrictions over how they spend Infrastructure Levy?

25. No comment.

Q25. (a), Should an affordable housing 'ring-fence' be developed?

25.1 Yes.

25.2 An affordable housing ring-fence should be developed to ensure monies received are allocated to the delivery of affordable housing.

25.3 It is unlikely that authorities will receive more funding than is necessary to provide 'core infrastructure obligations' and there is a risk of separating the infrastructure benefits of development from the communities in which it takes place. It would also be important to ring-fence the funding for affordable housing, to ensure ongoing provision.

Q26. 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?

26. Yes. We are concerned that these reforms, were they to go ahead, would disproportionately affect vulnerable groups. This would be the result of a planning system that is poorly designed to cater for their needs, which restricts councils in setting local policy and where a key stage of the planning process, whereby communities and councils have their say whether development can go ahead and if so, in what form, is to be omitted.



Additional comments

Opportunity missed

27. We are deeply concerned that the government's current proposals fail to address the provision of social housing. It is our view that simply building more market price homes isn't enough to help many of those who are faced with the housing crisis, because this is only likely to influence prices over the long-term. We do not believe that simply aiming to reduce house prices by increasing the supply in some places will solve the current crisis. We suggest that to make homes more affordable we have to **build more affordable homes**.

The economic impact of social housing

29. For every £100 million invested in affordable housing supply via both public and private finance generates £210 million of economic output in the wider economy and sustains 1,270 jobs.

30. For decades housing built and managed by councils and housing associations was a source of pride, security and a start in life. Labour and Conservative Governments saw this as essential in meeting people's housing needs and aspirations.

31. We highly recommend that the government considers enabling Local Authorities to re-engage in developing social housing for rent.

Ian Bryan

23rd October 2020

For and on behalf of the 'Friends of South Hams'

Written replies to FOSH, 1 Croft Road, Salcombe, Devon, TQ8 8DZ

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[FOSH Web](#)

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ANNEX 1.

Friends of South Hams

Changes to the current planning system consultation

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29th September 2020

Friends of South Hams Representation.

1. A key part of this consultation is to seek engagement from a wide range of people on the proposed changes to the current planning system.
2. The 'Friends of South Hams' are a community group who effectively campaign to protect the South Hams and its countryside, in particular, the South Devon Area of Outstanding Natural Beauty, and to ensure that development is appropriate, in the right place, so that it benefits the local community and visitors.
3. The range of proposals contained in the 'Changes to the Existing Planning System' consultation is aimed at significantly increasing the number of homes that would be built in the South Hams.
4. We note that no evidence has been presented by the Government that a higher level of housebuilding will have the intended outcome of reducing average house prices in our area, still less that there will be any benefit for existing residents trying to step onto or climb the housing ladder.
5. The two current consultations have nothing substantial to say about the national climate emergency or impact on creating a greener environment.



6. We do not believe that the Government's recently announced commitment to 'protect' 400,000 hectares of the English countryside, to support the recovery of nature, will have a significant effect on the already highly protected South Hams and that the threat to the area from the higher housebuilding numbers is increased by the proposed changes to the existing planning system.

Inappropriate development

7. We argue, that there is little justification for the proposed increase in the housebuilding requirement and we also believe that the risks of inappropriate development will increase.

Reducing the supply of affordable homes

8. There is also a range of other proposals in the consultation document which would affect the provision 'First Homes'. We believe the proposals to change the threshold for developer contributions by temporarily lifting the small site's threshold below which developers do not need to contribute to affordable housing, from 10 to up to 40 or 50 units to support SME builders is likely to significantly reduce the supply of affordable homes in our area, where the majority of sites are under the proposed threshold.

Harming the environment

9. We believe that the activities that are detailed here (i.e. increasing the number of homes that the council would be required to provide for in the Local Plan) would have a significant negative impact on our environment. At the moment there are no details in the consultation document in terms of how this would be addressed.

Need for affordable rented housing

10. The overwhelming need in rural areas is for affordable rented housing. Requiring 25% of affordable housing contributions to be First Homes will squeeze out affordable rented housing. Given the high house prices and relatively low rural



incomes, the national price and income caps will make First Homes unaffordable to many South Hams rural residents.

Revised standard methodology

11. The revised standard methodology and the removal of the existing 'cap' would, we believe, increase the housing requirement for the South Hams from the current estimate of 324 to 760 dwellings, an increase of 137% in the number of houses which need to be built annually in the district.

Not compatible

12. Given the constraints on development arising from the protected areas, such as the South Devon Area of Outstanding Natural Beauty, we do not see how this proposed level of development could be compatible with the Local Authorities' existing sustainability, bio-diversity and environmental objectives.

Widely held views

13. We also believe that our view is shared by a number Parish and Town Councils, and local planning authorities in Devon and other parts of the South West of England which would also see substantial increases in the number of privately owned homes that they would need to provide in their Local Plan, due to the increased emphasis in the current proposals on the affordability factor.

We, therefore, object to the use of the revised formula simply to increase the number of privately owned homes in the South Hams.

Steep property ladder

14. Whilst the discount for First Homes would be a good financial incentive and allow a greater number of people onto the first rung of the housing property ladder, there is little detail in the proposals as to how the subsequent sale of a property will ensure that the home remains affordable in the future. We believe that the schemes will create a wide gap between what is affordable as the 'first rung on the property ladder' and that of the second rung property – for which no discount is available. If



house prices were stabilised (by increasing supply) then moving on from the First Home may be as difficult as joining the market in the first place.

No explanation

15. The government has not explained clearly in the consultation on how the proposed changes would specifically benefit SME builders.

Unaffordable housing

16. We also believe that the change in the threshold for the provision of affordable housing is inconsistent with the government's concerns to promote affordability. The proposal seems to be inconsistent with the justification for a revision to the standard methodology to address the issue of affordability. Our Local Authority would be prevented from asking developers to provide affordable housing for sites that fall under a new threshold. **We, therefore, object to the proposals in this consultation document to increase the threshold from 10 homes to 40 or 50 at which contributions for affordable housing can be obtained.**

Permission in Principle

17. It is proposed to extend the current 'Permission in Principle' (PIP) arrangements to major development so landowners and developers would have a fast route to secure the principle of development for housing, without having to present detailed plans first.
18. We are concerned that extending the scope of PIPs to housing developments up to 150 homes i.e. below the current Environmental Impact Assessment threshold, that the community would only be able to comment on the principle of development and would only have limited information about the planning proposal and very limited consultation time to respond.

We therefore strongly object to the proposals for an expanded role of PIPs.



Opportunity missed

19. We are deeply concerned that the government's current proposals fail to address the provision of social housing. It is our view that simply building more market price homes isn't enough to help many of those who are faced with the housing crisis, because this is only likely to influence prices over the long-term. We do not believe that simply aiming to reduce house prices by increasing the supply in some places will solve the current crisis. We suggest that to make homes more affordable we have to **build more affordable homes**.

The economic impact of social housing

20. For every £100 million invested in affordable housing supply via both public and private finance generates £210 million of economic output in the wider economy and sustains 1,270 jobs.¹

21. For decades housing built and managed by councils and housing associations was a source of pride, security and a start in life. Labour and Conservative Governments saw this as essential in meeting people's housing needs and aspirations.

We highly recommend that the government considers enabling Local Authorities to re-engage in developing social housing for rent.

Summary:

- **Question 6. We object to the use of the revised formula simply to increase the number of privately owned homes in the South Hams**
- **Question 15. We object to the proposals in this consultation document to increase the threshold from 10 homes to 40 or 50 at which contributions for affordable housing can be obtained**
- **Question 24. We strongly object to the proposals for an expanded role of PIPs.**



- **We highly recommend that the government considers enabling Local Authorities to re-engage in developing social housing for rent**

Ian Bryan
29th September 2020

For and on behalf of the 'Friends of South Hams'
Written replies to FOSH, 1 Croft Road, Salcombe, Devon, TQ8 8DZ

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[FOSH Web](#)

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¹https://scotland.shelter.org.uk/_data/assets/pdf_file/0009/1218609/Economic_impact_of_housing_investment.pdf/nocache