

Nayland with Wissington Conservation Society (“NWWCS”) response to Planning for the Future Consultation

The NWWCS has reviewed the consultation document and has the following comments to make.

Questions: -

Q1 The three words we associate most with the planning system in England are (a) Comprehensive (b) Professional (c) Equitable

Q2 We get involved in planning decisions in our local area

Q3 We regularly review the on-line planning application register of our local authority and expect to continue to do so.

Q4 The top priorities for planning in our local area are (a) protection of existing heritage buildings and conservation area (b) protection of the Dedham Vale AONB and (c) supporting the local economy

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

We do not agree that two out of the three types of land are to be identified for development. This would result in the majority of the country being opened up for building and would undo the significant protection enjoyed by England and Wales since the introduction of the 1948 Planning legislation. Only 30% of the country comprises land which falls within your “Protected Area” definition and consequently you are proposing that development should be more easily permitted in the remaining 70%. These proposals will undo 72 years of protection.

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

Whilst we accept this proposal might be appropriate for some limited generic policies we think it is generally inappropriate for the reason that the geological complexity of England and Wales produces such local distinctiveness, that it cannot be protected by an overarching policy generalisation.

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?

This attempt to replace legal and policy tests runs the risk of over simplification of a fairly complex web of issues with the likely result that environmental issues will not be adequately addressed. Accordingly, we do not agree with these proposals.

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

According to research by Shelter, 380,000 homes have been granted planning permission but remain unbuilt in England. The proposed standard method for establishing housing requirements does not deal with this issue. Furthermore, this proposal does not (a) establish a local housing requirement or need (b) permit councils to plan for a housing requirement that is lower than the requirement produced by the standard method (c) adequately ensure that Protected Areas receive the protection that they need and deserve.

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?

We do not agree with this proposition. The correct indicator should be the determination of the number of homes needed to support communities in the given area without conflicting with the objectives of conserving and enhancing the area.

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

No, we strongly disagree with this proposal. Each application should be considered on its own merits. Speed of consent does not guarantee speed of construction.

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

This proposal appears to be in direct conflict with paragraph 172 of the NPPF which states that Protected areas enjoy the "highest status of protection". Accordingly, we strongly disagree with this proposal.

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

Speed is less important than reaching the correct decision and to the extent that faster decision-making results in poorer decisions we would not agree to the current proposals.

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

Our Local Plans are already accessible on the internet. We doubt that the new proposals which appear to have a universal structure can adequately meet the huge differences between the localities. Accordingly, we disagree with this proposal.

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

Each Local Authority area is considerably different from each another in both size and complexity and to impose the same strict time table on every Authority must create the risk that the job is not done properly. Accordingly, we disagree with this proposal.

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

Yes, we agree that Neighbourhood Plans should be retained.

Q14. Do you agree there should be a stronger emphasis on the build out of developments?

Yes, we agree with this emphasis.

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

Some developments have been acceptable and others have been inappropriate.

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

Energy efficiency of new buildings.

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

We would support any improvement in the quality of design provided this reflects the local vernacular.

Q 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?

As this appears to be an aspiration rather than a detailed plan it is difficult to give unqualified approval but we accept the principle of the proposal subject to review once the detail is available.

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

Homes England is a comparatively new organisation with a limited track record and it is therefore impossible to reach any decision upon whether this organisation should lead the issues of design quality.

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

No. We would argue that each case should be fully considered on its merits and there is too much risk in permitting any development without a full and proper consideration.

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

(a) Design (b) Affordable housing

Please note we are not expressing a view on the issue of the Community Infrastructure Levy.