Response ID ANON-SNQ4-RDK7-X

Submitted to Proposed reforms to the National Planning Policy Framework and other changes to the planning system
Submitted on 2024-09-22 11:11:42

Scope of consultation

Respondent details

a What is your name?

Name:
John Steele

b What is your email address?

Email:
horshamblueprint@gmail.com

c What is your organisation?

Organisation:
Horsham Blueprint Neighbourhood Forum (covering the unparished area of Horsham in West Sussex)

d What type of organisation are you representing?

Neighbourhood planning body, parish or town council

If you answered "other", please provide further details:

Chapter 1 – Introduction

Chapter 2 – Policy objectives

Chapter 3 – Planning for the homes we need

1 Do you agree that we should reverse the December 2023 changes made to paragraph 61?

Not Answered

Please explain your answer:

2 Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

Not Answered

Please explain your answer:

3 Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Not Answered

Please explain your answer:

4 Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

No

Please explain your answer:

Towns like Horsham, Sussex, have grown in phases, particularly following the arrival of train services in the mid 1800s. This has resulted in areas of clearly defined character which have survived virtually intact into 21st century. The character of urban areas has a very significant impact on the overall feeling of wellbeing, belonging and social cohesion and the built environment forms the major component. Whilst some parts of urban areas are protected by Conservation Areas there are many others which are not which could be significantly degraded by inappropriate development at a significantly higher density. An example in Horsham, Sussex, are the areas of Victorian terrace housing which have a continuity of form which makes an attractive street scene and establishes the character and feel of the area.

5 Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

No

Please explain your answer:

There is a place for both.

6 Do you agree that the presumption in favour of sustainable development should be amended as proposed?

Not Answered

Please explain your answer:

7 Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

Not Answered

Please explain your answer:

8 Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Not Answered

Please explain your answer:

9 Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

Not Answered

Please explain your answer:

10 If Yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

Not Answered

Please explain your answer if you believe a different % buffer should be used:

11 Do you agree with the removal of policy on Annual Position Statements?

Not Answered

Please explain your answer:

12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Not Answered

Please explain your answer:

13 Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Yes

Please explain your answer:

The current tests of soundness in regard to delivery and viability are largely ineffective. The first comes with no penalties for developers that choose to slow planned delivery for market reasons. The second is unnecessarily complex, opaque and costly inviting developers to seek to rewrite their viability case almost before the first brick is laid. There needs to be a system of enforceable obligations on developers to deliver strategic scale developments and associated infrastructure as approved to time, with penalties for failure.

14 Do you have any other suggestions relating to the proposals in this chapter?

Please provide any other suggestions relating to the proposals in this chapter. :

Chapter 4 – A new Standard Method for assessing housing needs

15 Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

Not Answered

Please explain your answer:

16 Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

Yes

Please explain your answer:

We have no alternative to suggest.

But we doubt that this approach will have the desired affect of reducing prices particularly in the south-east where demand is so high and high land costs are already locked in to developers' land banks. Instead it is likely to result in more housing at similar or higher price.

17 Do you agree that affordability is given an appropriate weighting within the proposed standard method?

Not Answered

Please explain your answer:

18 Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Not Answered

Please explain your answer:

19 Do you have any additional comments on the proposed method for assessing housing needs?

Please provide any additional comments on the proposed method for assessing housing needs.:

Chapter 5 – Brownfield, grey belt and the Green Belt

20 Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes

Please explain your answer:

We understand and agree with the overall aim of this change, but there is a problem with the definition of brownfield land as it includes the entire curtilage of previously developed land including gardens. Inappropriate 'garden grabbing' as a means of increasing the density of housing through in-fill is already a problem and can adversely affect the character of certain areas within towns. This proposal needs to address this, such as including a minimum plot size.

21 Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

Not Answered

Please explain your answer:

22 Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Please provide any further views:

23 Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

Not Answered

Please explain your answer:

24 Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Not Answered

Please explain your answer:

25 Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Not Answered

Please explain your answer:

26 Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Not Answered

Please explain your answer:

27 Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Not Answered

Please explain your answer:

28 Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

Not Answered

Please explain your answer:

29 Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Not Answered

Please explain your answer:

30 Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

Not Answered

If not, what changes would you recommend?:

31 Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Not Answered

Please explain your answer:

32 Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

Not Answered

Please explain your answer:

33 Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

Not Answered

Please explain your answer:

34 Do you agree with our proposed approach to the affordable housing tenure mix?

Not Answered

Please explain your answer:

35 Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

Not Answered

Please explain your answer:

36 Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Not Answered

Please explain your answer:

37 Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

Not Answered

Please explain your answer:

38 How and at what level should Government set benchmark land values?

Please explain your answer:

39 To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

Not Answered

Please explain your answer:

40 It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Please explain your views on this approach:

41 Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

Not Answered

Please explain your answer, including what support you consider local authorities would require to use late-stage viability reviews effectively:

42 Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

Not Answered

Please explain your answer:

43 Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

Not Answered

Please explain your answer:

44 Do you have any comments on the proposed wording for the NPPF (Annex 4)?

Not Answered

Please explain your answer:

45 Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

Not Answered

Please explain your answer:

46 Do you have any other suggestions relating to the proposals in this chapter?

Yes

Please explain your answer:

We note that it is not intended to change para 144 of the current NPPF in respect of the presumption against the establishment of new Green Belts.

The trend towards settlement coalescence in recent years is a major cause of concern to medium size towns such as Horsham. It can lead to loss of community identity which in turn can affect people's long term health and wellbeing. In areas without Green Belts it is currently difficult to create fully protected strategic gaps between settlements and this needs to be addressed.

Chapter 6 – Delivering affordable, well-designed homes and places

47 Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Not Answered

Please explain your answer:

48 Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Not Answered

Please explain your answer:

49 Do you agree with removing the minimum 25% First Homes requirement?

Not Answered

Please explain your answer:

50 Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

Yes

Please provide any further comments:

It is unclear why this requirement is needed and cannot be realised within local plans.

51 Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes

Please explain your answer:

Currently social housing is sometimes relegated to the least advantageous parts of a strategic development.

52 What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Please explain your answer:

53 What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Please explain your answer:

54 What measures should we consider to better support and increase rural affordable housing?

Please explain your answer:

55 Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Not Answered

Please explain your answer:

56 Do you agree with these changes?

Yes

Please explain your answer:

We believe that community-led development has the potential to play a useful role in housing delivery and everything necessary should be done to encourage it.

57 Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

Yes

If Yes, what changes would you recommend?:

We support changes to extend the provision of affordable housing for rent by charitable or similar regulated organisations.

58 Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Not Answered

Please explain your answer :

59 Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

Partially agree

Please explain your answer:

We accept these are particularly subjective terms and their effectiveness is questionable. There is an underlying problem in relation to the quality of design of developments and that is local authorities no longer employ architects or use architect led reference panels to offer informed judgement on the proposed design of buildings. This is contributory reason why little or no attempt has been made in this country to design and build genuinely novel and attractive modern housing suitable for 21st Century.

60 Do you agree with proposed changes to policy for upwards extensions?

No

Please explain your answer:

We have serious concerns about this change. The addition of badly planned, incongruous upward extensions can create an adverse impact on the street scene out of all proportion to the size of the development, all the more so if an extension is added to a single one of a series of similar properties.

We agree that the current emphasis on mansard roofs is inappropriate but we strongly oppose the removal of the words "height and" from the fourth line of existing paragraph 124(e). There is no point in making changes to the NPPF intended to deliver attractive well planned developments whilst allowing existing street scenes to be vandalised. The likely gain in new homes would be heavily outweighed by the social damage caused.

61 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 7 – Building infrastructure to grow the economy

62 Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Not Answered

Please explain your answer:

63 Are there other sectors you think need particular support via these changes? What are they and why?

Not Answered

Please explain your answer:

64 Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

Not Answered

Please explain your answer:

65 If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

Not Answered

If Yes, what would be an appropriate scale? :

66 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 8 – Delivering community needs

67 Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Not Answered

Please explain your answer:

68 Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Not Answered

Please explain your answer:

69 Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

No

Please explain your answer:

Experience has shown that a vision which delivers what the planners think people ought to want inevitably leads to under provision of essential services and infrastructure. An example in recent years is the attempt to reduce car usage by restricting the number of car spaces in new developments, particularly in town centres. All that happens is people still need cars for some journeys and park wherever they can find a place on the surrounding streets, exacerbating an already serious problem.

70 How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Please explain your answer:

By requiring all new developments to provide on-site recreational green space (including playing fields), playgrounds, safe cycling routes and paths that connect localities and encourage walking for a purpose.

71 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 9 – Supporting green energy and the environment

72 Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Not Answered

Please explain your answer:

73 Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Not Answered

Please explain your answer:

74 Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Not Answered

Please explain your answer:

75 Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Not Answered

Please explain your answer:

76 Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Not Answered

Please explain your answer:

77 If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Please explain your answer:

78 In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Please explain your answer:

More weight needs to be given to simple practical steps such as rainwater harvesting, grey water reuse and solar capture. These should be mandatory for all but the smallest developments. Developments need to be designed around these requirements, not have them tacked on to old designs as an obligation.

79 What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

Please explain your answer:

80 Are any changes needed to policy for managing flood risk to improve its effectiveness?

Not Answered

Please explain your answer:

81 Do you have any other comments on actions that can be taken through planning to address climate change?

Not Answered

Please explain your answer:

82 Do you agree with removal of this text from the footnote?

Not Answered

Please explain your answer:

83 Are there other ways in which we can ensure that development supports and does not compromise food production?

Not Answered

Please explain your answer:

84 Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Not Answered

Please explain your answer:

85 Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Not Answered

Please explain your answer:

86 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 10 – Changes to local plan intervention criteria

87 Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Not Answered

Please explain your answer:

88 Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Not Answered

Please explain your answer:

Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

89 Do you agree with the proposal to increase householder application fees to meet cost recovery?

Not Answered

Please explain your answer:

90 If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

Not Answered

If Yes, please explain in the text box what you consider an appropriate fee increase would be. :

91 If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Not Answered

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.:

92 Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your answer:

93 Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Not Answered

Please explain your reasons and provide evidence on what you consider the correct fee should be:

94 Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

Not Answered

Please explain your answer:

95 What would be your preferred model for localisation of planning fees?

Not Answered

Please give your reasons in the text box below:

96 Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

Not Answered

If Yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development? :

97 What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

Please explain your answer:

98 Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Not Answered

99 If Yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Please explain your answer:

100 What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Please explain your answer:

101 Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

Please explain your answer :

102 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer.:

Chapter 12 – The future of planning policy and plan making

103 Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

Not Answered

Please explain your answer:

104 Do you agree with the proposed transitional arrangements?

Not Answered

Please explain your answer:

105 Do you have any other suggestions relating to the proposals in this chapter?

Not Answered

Please explain your answer:

Chapter 13 – Public Sector Equality Duty

106 Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

Please explain your answer:

Chapter 14 – Table of questions

Chapter 15 – About this consultation