



Edenbridge Town Council

Town Clerk: Caroline Leet



Planning for the Future - White Paper Edenbridge Town Council response to Consultation Questions

Pillar One

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

1.1. Centralist, protectionist, rule-based

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

(b) If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other - please specify]

1.2. (a) YES

3. Our proposals will make it much easier to access plans and contribute your view to planning decisions. How would you like to find out about plans and planning proposals in the future? [Social media / Online news / Newspaper / By post / Other - please specify]

1.3. All of the listed (above); plus maintaining the physical notices (i.e. lampposts). The Planning Portal could have clearer information to highlight local level planning applications. The digital model and plans accessible for digital advancements.

4. What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other - please specify]

1.4. Protection of green spaces / Better local infrastructure / Supporting the local economy

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

1.5. NO.

1.6. The proposed 'renewal areas' would be in towns and parishes which are already built-up areas with varying density and uses. Most development opportunities are

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likely to be small and restricted by neighbouring properties and local character.

- 1.7. The consultation document says that 'renewal areas' will be suitable for development, but that will not always be the case as for some potential sites there will not be room for development to take place in an acceptable manner and, in some locations, it will be necessary to control the type of development that is acceptable for environmental reasons or to support local economies.
- 1.8. The existing national policy is already very supportive of new development in these areas. The proposed further relaxation of control would shift the balance too far towards unconstrained development putting at risk the character of developed areas. For these areas proposals still need to be considered on a case by case basis through planning applications.
- 1.9. The proposals for Local Plans does not emphasise the economy sufficiently. Greater control should be given to local areas to identify development in 'renewal areas' where existing communities will be affected.

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement]

- 1.10. NO.
- 1.11. National policies are fine but they need to be supplemented with local policies if local distinctiveness is to be maintained.

7. (a) Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of "sustainable development", which would include consideration of environmental impact? [Yes / No / Not sure. Please provide supporting statement]

- 1.12. (a) NO.
- 1.13. To simplifying the soundness test and sustainability appraisal are good in principle, but this document offers no information on how this allows for the uniqueness and issues of different areas.
- 1.14. The alternative proposal in para 2.22 requiring reserve sites to be identified would create uncertainty in that there would be the identified sites, but also a risk that the reserve sites could eventually be developed. There would likely be disputes for the future over whether reserve land is needed.
- 1.15. The regular plan reviews proposed in the White Paper provides opportunity, if necessary, to add or replace sites for growth, but there could be conflicts should the initial identified sites then also get developed.

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

- 1.16. (b) Duty to cooperate in its current form needs to be replaced, but the consultation document offers no proposals for this, nor does it suggest how issues where towns and parishes that sit on cross district borders and cross country borders. In regions where there are already constraints and building challenges are usually similar cross

boundary.

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

1.17. (a) NO.

1.18. Changes to the existing standard method for assessing housing need, does not say it will take in to consideration areas which are already exceptionally constrained; Sevenoaks District with 93% Green Belt, 60% AONB and 41 Conservation Areas across many of the District's settlements. The proportions of land in each local authority area constrained by Green Belt, National Park, an AONB or an SSSI were published in September 2017 by MHCLG in conjunction with a Housing Need consultation. This data shows that Sevenoaks District is the tied top most constrained Local Authority with 94% of the land covered by these constraints. In the notes for this data it is stated this "...provides an indication of land that is not generally available for development, to illustrate the point in the consultation document that not all authorities will be able to meet their need in full within their own area." How to deal with constraints is a huge unanswered question in the White Paper.

1.19. Sevenoaks District cannot currently meet the housing need in full and will certainly not be able to meet the increased need under the proposed changes to the standard method. These new proposals would result in an increase of 15% to 820 units per annum above the existing standard method figure.

1.20. The consultation proposes to remove Step 3 of the standard method calculation to cap housing need. The capping of housing need was introduced "to help ensure the minimum local housing need figure... is as deliverable as possible" (PPG Paragraph: 007 Reference ID: 2a-007-20190220). It is unclear why this position has changed and we fundamentally do not agree with what is proposed.

1.21. The impact of constraints on the scale of development that should be required in individual Districts will be a matter for local assessment taking account of factors such as the amount of unconstrained land available and a judgement of whether any unconstrained land could be released without undue harm. It cannot be reduced to a simple calculation carried out at a national level.

1.22. Edenbridge is surrounded by Green Belt and is also constrained by floodplain. It is already supporting development on Green Belt land has already planned for development through the draft local plan, but would not be able to meet additional development without encroaching further in to the protected Green Belt.

1.23. Edenbridge also does not have the infrastructure for significant increase to development. It does not have an A road (the nearest is 5-miles away); it has only B roads. It has one primary school, no secondary school and it does not have a bank.

(b) Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement]

1.24. (b) NO.

- 1.25. Affordability is affected by more than just supply and demand. It is a complex amalgamation of issues including land availability and social and economic factors.
- 1.26. The standard method has provided a formula that redistributes uplift in housing need across the country, which appears to penalise areas of the country with high average house prices. While affordability of housing is a factor in determining local housing requirements, there are other factors that should be considered such as land values and gross development values (GDVs). The focuses from these calculations appear to only relate to home ownership and ignores rental market needs and needs for affordable homes.

9. (a) Do you agree that there should be automatic outline permission for areas for substantial development (*Growth* areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement]

1.27. (a) NO.

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

1.28. (b) NOT SURE - there is not enough information and it is unclear the definition of protected areas and if local designated areas such as protected open spaces are included.

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

1.29. (c) NOT SURE - there is not enough information

10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement]

1.30. NO.

1.31. There needs to be an opportunity for local issues to be considered. The proposals do not allow consideration of the role of planning in improving the quality of development through encouraging pre application negotiations or negotiating improvements to submitted applications. Consequently more applications are likely to be refused resulting in development being delayed rather than speeded up.

1.32. There is also no mention either of the presumption in favour of the development plan which is an important principle that must be retained.

11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement]

1.33. YES

1.34. However, funding will need to be made available to make it more accessible to people. Towns and parish council may not have sufficient funding or the facilities to aid this.

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

1.35. NO.

1.36. The proposed timetable does not provide adequate consultation at local level/ town and parish level. Only 6-week opportunity for public consultation (and town and parish councils) during the entirety of preparing a Local Plan.

1.37. There is real lack of opportunity to consult and allow the plan making body to make changes in response to the consultation replies on the draft plan. An extra stage is needed to review and amend the plan before submission (after which it is outside the control of the plan making body).

13. (a) Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement]

1.38. (a) YES.

1.39. But, only if Neighbourhood Plans are given meaningful influence and weight. The White Paper does not give any indication that this would be the case.

(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?

1.40. (b) Ensuring there is adequate funding at local level with a specific planning officer for town and parish level.

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what measures would you support? [Yes / No / Not sure. Please provide supporting statement]

1.41. NOT SURE – not sure at local level in a position to respond.

Pillar Two

15. What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly- designed / There hasn't been any / Other - please specify]

1.42. MIXED.

1.43. Permitted development must be made to follow local design guides.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other - please specify]

1.44. Energy efficiency of new buildings / less reliance on cars

17. Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting

statement]

1.45. YES.

1.46. Like the national guidelines that came out in 2019 – localising it is a good suggestion.

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 placemaking? [Yes / No / Not sure. Please provide supporting statement]

1.47. NO.

1.48. In principle it sounds good, but where would the cost of the resource come from to ensure that it is done properly.

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes / No / Not sure. Please provide supporting statement]

1.49. NOT SURE – unable to say from the information provided in the paper.

20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement]

1.50. NO.

1.51. Cannot have a 'standard of beauty'. Beauty needs to take in to account the local environment. Pre-established does not work with topography and other local issues.

1.52. To achieve more beautiful development requires careful, independent, expert consideration of proposals taking account of local site specific circumstances as well as national and any local design codes. Fast tracking will prevent such detailed examination from taking place and will hinder rather than promote more beautiful development.

Pillar Three

21. When new development happens in your area, what is your priority for what comes with it? [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other - please specify]

1.53. More or better infrastructure (transport, schools etc) / Design of new buildings

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 / No / Not sure. Please provide supporting statement]

1.54. NO.

1.55. Removing s106 would mean there would be no opportunity for particular

infrastructure needs for individual sites. S106 should be kept for local peculiarities.

(b) Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]

1.56. LOCALLY.

1.57. Development values/profitability across the country varies. It is therefore vital that the charge continues to be set locally as a national charge would inevitably be lower than the higher areas.

(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? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement]

1.58. MORE – it would depend on the circumstances. If losing S106, the Levy would need to recuperate that loss so would need more overall

(d) Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement]

1.59. YES

1.60. Under the proposed changes, if it insists on making post development it would be essential to borrow against the Infrastructure Levy.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement]

1.61. YES

1.62. Permitted Developments are generating infrastructure deficits without contributing and therefore are getting away without paying.

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 / No / Not sure. Please provide supporting statement]

1.63. NOT SURE

1.64. Edenbridge is not short of affordable housing. The Levy needs to be set locally and to identify local needs; prefer flexibility at local authority level.

1.65. However, affordable housing development is just as important as market housing and a key objective of reform should be to increase not just maintained affordable housing provision.

1.66. A national rate would almost certainly be lower than could be justified locally where development is more profitable.

(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? [Yes / No / Not sure. Please provide supporting statement]

1.67. NOT SURE.

1.68. Local authorities require flexibility to deal with what is required in their area at the time and not be forced to do it.

(c) If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement]

1.69. YES.

1.70. Bringing affordable housing with everything else under one levy will result in insufficient funds to meet all needs.

(d) If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement]

1.71. YES.

1.72. Affordable housing should be scattered across development.

25. Should local authorities have fewer restrictions over how they spent the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement]

1.73. YES.

(a) If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement]

1.74. NO.

1.75. Affordable housing should not be ring fenced, but there should be controls in place to ensure that affordable housing needs for an area is met.

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?

1.76. NO.

ADDITIONAL COMMENTS:

1.77. The proposed changes in the White Paper represent considerable expenditure which would need to be paid for.

1.78. Clarity is needed on what "genuine community involvement" means.