



# Dartmoor Forest Parish Council

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‘Planning for the Future’ – Response to consultation on Ministry of Housing Communities & Local Government White Paper. October 2020.

Questions	DFPC Response
1. What three words do you associate most with the planning system in England?	<ul style="list-style-type: none"><li>• Essential</li><li>• Complex</li><li>• Opaque</li></ul>
2. Do you get involved with planning decisions in your local area? [Yes / No]  2(a). If no, why not?  [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]	Yes, the parish council are consulted on all planning applications in our parish.
3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?  [Social media / Online news / Newspaper / By post / Other – please specify]	Primarily through digital means, notably email and online alerts. Social media is not suitable as the only platform for communicating plans and proposals. Consideration must be given to those who cannot access information online. This is particularly important in areas of rural deprivation and poor internet access.

<p>4. What are your top three priorities for planning in your local area?</p> <p>[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]</p>	<ul style="list-style-type: none"> <li>• Protection of green spaces – <b>specifically Dartmoor National Park/</b> the environment, biodiversity and action on climate change</li> <li>• Increasing the affordability of housing – <b>specifically housing in rural areas.</b></li> <li>• Supporting the local economy.</li> </ul>
<p>5. Do you agree that Local Plans should be simplified in line with our proposals?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>No.</p> <p>The proposals do not provide for any role for town and parish councils. As these councils are at the most local level of government it is vital that their role is integral to any revised planning process. We also believe that brownfield sites should be classified separately and given the highest priority for development. For reasons of scale and economy large housing developers often prefer to build on green field sites. The planning system should do more to discourage this and actively promote and prioritise developments on brownfield sites. CPRE report that there are sufficient brownfield sites to meet the government target for new homes for the next 5 years: <a href="https://www.cpre.org.uk/news/theres-already-enough-suitable-land-to-meet-targets-for-new-homes-we-find/">https://www.cpre.org.uk/news/theres-already-enough-suitable-land-to-meet-targets-for-new-homes-we-find/</a></p> <p>Also, areas that are in the ‘Protected’ category should include all land within the boundaries of National Parks.</p> <p>As Dartmoor National Park Authority has the Tamar Valley AONB to the west and South Devon AONB to the south, there is concern that the remaining land would be classified as a ‘Growth’ category leading to an intensification of the current trend of largescale housing estates being built on the edge of Dartmoor. This would result further pressure in terms of traffic, visitor numbers and overall negative environmental impact on the National Park.</p>

<p>6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>No.</p> <p>There is no reference to any role for town and parish councils. The parish council are concerned that this reduces the role of the local community in influencing planning in its area. Overall, the parish council are concerned that the White Paper reduces democratic accountability and the rights of the individual to participate</p>
<p>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?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?</p>	<p>Not sure.</p>
<p>8. (a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>No.</p> <ul style="list-style-type: none"> <li>a) This approach assumes that there is insufficient land approved for planning, however many large developers are sitting on land banks waiting for the optimum market conditions to build houses. It is unclear how developers will be encouraged to release this land for affordable housing.</li> <li>b) More affordable housing for local people in perpetuity.</li> </ul>
<p>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?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>No.</p> <p>If there is automatic outline permission for Growth Areas identified in the Local Plan then there is a requirement that the Local Plan receives broad, public support. It is unclear from the White Paper if Local Plans will get wider public participation or democratic support than the</p>

<p>(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>current process. Presently, Neighbourhood Plans are subject to approval through local referendum. Will Local Plans be given the same level of democratic oversight?</p>
<p>10. Do you agree with our proposals to make decision-making faster and more certain?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Not sure. It is unclear whether the time of the current decision-making process contributes to any material delay in the building of new houses.</p>
<p>11. Do you agree with our proposals for accessible, web-based Local Plans?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Yes. Although the parish council broadly supports a more efficient, digital based service this needs to be accessible in areas of poor internet access.</p>
<p>12. Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Not sure. The parish council welcomes the ambition of having Local Plans in place that are not out of date and redundant before they are finished. Nevertheless, sufficient time should be allowed to ensure full community involvement.</p>
<p>13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Yes. However, it is unclear how effective Neighbourhood Plans are, especially in National Parks.</p>

<p>13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?</p>	<p>Neighbourhood Plan groups, as a volunteer initiative, should be given greater support and training in the development of plans and the use of digital tools.</p>
<p>14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Yes. Developers should not be sitting on approved applications and land banks waiting for the optimum market conditions to build. This causes uncertainty to local communities. Financial penalties should be considered to ensure that developers do build out developments in a timely manner.</p>
<p>15. What do you think about the design of new development that has happened recently in your area?</p> <p>[Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]</p>	<p>Not sure or indifferent. The large new build housing estates in the towns around Dartmoor, including Tavistock, Newton Abbott, Ivybridge and Bovey Tracey are largely similar, white rows of houses. It is difficult to see what beauty and value they add to the local environment.</p>
<p>16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?</p> <p>[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]</p>	<p>More use of local materials where appropriate.</p>
<p>17. Do you agree with our proposals for improving the production and use of design guides and codes?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Yes. Agree broadly with the principle of design codes. However, the ambition should be to design distinctive and lasting architecture that is sympathetic to the environment it is being built in. This should not be a developer led handbook to build cheap, poor quality, identikit housing.</p>

<p>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?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Yes. Good quality design should be central to all new development. In particular, design of all new homes should be carbon neutral.</p>
<p>19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Yes. Good quality design should be central to all new development.</p>
<p>20. Do you agree with our proposals for implementing a fast-track for beauty?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Not sure.</p>
<p>21. When new development happens in your area, what is your priority for what comes with it?</p> <p>[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]</p>	<p>More affordable housing for local people in perpetuity. More employment space.</p>
<p>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?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?</p>	<p>Not sure. Has any modelling been done to determine whether the proposed new Infrastructure Levy will bring in more funds? We believe that any new Levy should be set locally with the input of elected representatives. Concerned that allowing local authorities to borrow against the Infrastructure Levy presents a potentially unacceptable level of risk.</p>

<p>[Nationally at a single rate / Nationally at an area-specific rate / Locally]</p> <p>(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?</p> <p>[Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]</p> <p>(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	
<p>23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Not sure. Permitted development, notably the conversion of offices into homes has resulted in some very poor-quality housing. The White Paper should consider whether this is an adequate method of providing housing.</p>
<p>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?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>(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?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Unsure. This seems an unduly complicated and potentially risky method of building affordable housing. Relying on levies has historically not proved to be an effective method of delivering sufficient affordable housing which there is significant lack of. Therefore, the White Paper should consider alternative means of funding and building larger numbers of affordable housing than reliance on a developer levy.</p>

<p>(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	
<p>25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>(a). If yes, should an affordable housing 'ring-fence' be developed?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p>	<p>Yes. However, there should be an affordable housing 'ring fence'.</p>
<p>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?</p>	<p>Increasing reliance on digital methods should always consider the needs of those with a disability and those that do not have familiarity with and easy access to the internet.</p>