

**Burton Bradstock Parish Council**  
**Planning the Future White Paper**  
**Proposed Response to Consultation Questions.**

<b>PILLAR 1: PLANNING FOR DEVELOPMENT</b>
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*Proposal 1: The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are protected.*

*Q5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]*

**BBPC Response: NO**

Local and parish plans are fundamental to ensuring that local development reflects local needs, safeguards local distinctiveness and appropriately address the future needs of communities for homes, employment and green spaces.

The current process of plan production may well have shortcomings but simplifying and centralizing plan making will do nothing to foster local democracy or a future environment fit for local need.

The combination of the proposals to reduce the timescale for Local Plan production and to streamline the application process would severely limit the ability of local authorities and communities to influence local developments.

BBPC challenges the premise of the government's proposed reforms that suggests the planning system is to blame for the housing crisis. According to Dorset Council "Over the last 10 years 2.5 million homes were granted planning permission but only 1.5 million were delivered". Rather than blaming planning authorities, government should consider how to make sure that sites with planning approvals are built out within set timescales.

Without acknowledging and addressing the multi-faceted nature of housing crisis little progress can be made. Factors that require a government response include; tackling land banking, slow release of new housing and developer preference for easier and cheaper build out on 'greenfield' sites.

Removal of the opportunity for people to comment at outline planning application stage on sites allocated for growth will reduce the ability of communities to input into proposals affecting their local areas, and reduce local democracy.

*Proposal 2: Development management policies established at national scale and an altered role for Local Plans.*

*Q6. 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.]*

**BBPC response: No**

BBPC does not support the proposal that the National Planning Policy Framework become the primary source of policies for development management in Burton Bradstock.

The most acceptable approach mentioned in the consultation is of allowing "local authorities a similar level of flexibility to set development management policies as under the current Local Plans system, with the exception that policies which duplicate the National Planning Policy Framework would not be allowed."

*Proposal 3: Local Plans should be subject to a single statutory "sustainable development" test, replacing the existing tests of soundness.*

*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? [Yes / No / Not sure. Please provide supporting statement.] 7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?*

BBPC response: No

The problem here is that the “sustainable development” test proposed is one that accords with policies issued by the Secretary of State (NPPF) and as such do not, in our view, provide a robust test of the ecological, social or economic consequences. As we leave the EU we are losing protection of Habitats directives and a range of environmental frameworks designed to ensure development meets the needs of future generations. This appears to be a major weakening of community input and oversight over local development.

Abolishing the Sustainability Appraisal system and replacing with a simplified and centralized process for assessing the environmental impact of plans does not feel like the best approach for ensuring development satisfy the requirements of UK and international law and treaties.

BBPC thinks that the white paper proposals will need to be significantly strengthened if they are to facilitate a credible response to the climate and ecological crisis.

*Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.*

*Q8(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.] 8(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.]*

As stated in Q1; BBPC does not agree that land supply and approving more housing numbers is the pathway to solving the lack of affordable homes in the Burton Bradstock. This would save time at examinations but there would be no local democratic input into the housing number for the area.

By setting binding development targets for all areas, the system would be establishing a national distribution of development. This is not the same as a strategy that takes account of environmental constraints and understands and responds to the infrastructure needs an area will require to accommodate larges scale housing development.

The five year land supply calculations took up significant time at local plan examinations and planning appeals, and removal of the requirement would certainly help to simplify the system and reduce time. But the housing delivery test penalises local councils for failure to deliver, which is not in the councils’ control: it is developers that build houses, not local councils.

Housing need in Burton Bradstock is **Not** being delivered by the market. We have established a Community Land Trust specifically to find and negotiate affordable housing on ‘exception sites’. A centralized, national system risks exacerbating the current housing problems in rural Dorset – where new housing development focuses on the market demand for private, owner occupied or second homes. Being challenged to deliver high housing numbers will inevitably result in pressure for release of ‘greenfield’ sites that will continue to erode the qualities of the Dorset AONB landscape.

Affordable equity-shared/ owner occupation variations must not be allowed to crowd out affordable and social rent models.

BBPC would welcome a degree of certainty and above all transparency in the development process based around a plan that has local input and ownership.

*Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.*

Q9(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.] 9(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.] 9(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.]

Removal of the opportunity for people to comment at outline planning application stage on sites allocated for growth in plans will reduce the ability of communities to have input into proposals affecting their local areas, and reduce local democracy.

‘Front loading’ of this engagement at plan making stage is proposed, this would be very difficult within the restricted timescale the government is also setting for local plan preparation.

We do not agree that in Protected areas development proposals should be judged against the NPPF alone. See our earlier comments in relation to Local Plans including development management policies that do not duplicate the NPPF.

*Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology*  
Q10. Do you agree with our proposals to make decision-making faster and more certain?

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. Taking this into account, any proposals to deem permission granted merely because time limits have not been met, as suggested in the consultation, poses obvious dangers.

BBPC Agrees that we all want to see a planning system that is more streamlined and digitally enabled. What we feel is of equal importance is to ensure that in a push for greater speed in the plan process we do not lose community input. We know from our own experiences of parish plan development that a significant minority are less able to participate in the digital world and can be easily excluded from consultation processes unless their needs are understood and appropriate actions taken to keep them engaged.

*Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.*  
Q11. Do you agree with our proposals for accessible, web-based Local Plans?

BBPC response - Yes

with the above caveat that we cannot allow parts of our community to be excluded from the democratic process on the basis that they are less able to participate in the digital world.

Web based Local Plans will need to include a wide range of map based data to inform decision making about 21<sup>st</sup> century demands from land use – this must include climate mitigations, sustainable land use and nature recovery.

Standardisation of local plans also removes the potential for local innovation and distinctiveness.

*Proposal 8: Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so.*  
Q12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

## BBPC response – No

Restricting the timescale for Local Plan production whilst at the same time making this the only opportunity for local community input will inevitably constrain and pressurise what democratic/ community engagement could take place.

BBPC does not support the imposition of sanctions against public authorities – fear of costs being awarded against planning authorities has driven a tendency to approve developments rather than to hold out for the public interest in the planning process.

BBPC agrees that we should have a planning system that does not resort to appeal – unfortunately with the signals that developers receive and the size of the financial benefits that are to be gained from a successful development proposal – planning by appeal has become part of the system.

## PILLAR 2: PLANNING FOR BEAUTIFUL AND SUSTAINABLE PLACES

Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.

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

**BBPC response Partially Agree**

The white papers emphasis on design quality is very welcome – As an industry housebuilding in Britain is dominated by a relatively small number of very large companies that offer a limited approach to design. As a society, we also prize the perceived security and status that individual, private ownership can bring and as a culture, we tend toward the stylistically conservative - for the most part, people want to live in buildings that conform to traditional stereotypes. The consequences are strikingly similar developments across the country, lacking in quality and variety. Habitats and ecosystems are destroyed, while private enclaves and a lack of public, open space produce sterile and isolating environments. In combination, the result is a poor built and rural environment for the people, animals and ecosystems.

Design by 'pattern book' or codes are a relatively inflexible means of achieving quality outcomes. Master-planning requires the consideration of a wide range of factors other than just the appearance of built development. Design codes need to include a broad sweep of understandings both place and setting, including; the management needs of strategic landscapes, historic assets, greenspaces and the wider public realm.

Local design codes will require significant resourcing and training, and 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.

Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.

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?

BBPC recognises that if design and local preferences are to be part of a new approach to planning then local authorities will need resource support and expertise will need to be readily available to support and test local design codes.

BBPC would advocate a decentralised approach, perhaps through existing regional architectural and design centres? However, BBPC recognises that understanding and know how about rural design requires a significant investment if it is going to effectively steer new development in our area.

Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.

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

BBPC agrees that all those concerned with housing development should recognise and support high quality design.

### PILLAR 3: PLANNING FOR INFRASTRUCTURE AND CONNECTED PLACES

Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.

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

BBPC remains unclear as to how 'popular and replicable forms' of development will be agreed upon. In particular, how local design preferences will play out in a system that is looking to be nationally rolled out. BBPC fears that in prioritising easy and quick approvals villages like Burton Bradstock will end up with 'anywhere and everywhere' design solutions rather than more nuanced and locally appropriate design in keeping with the historic integrity of our village. 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 deliver the other elements of place making such as infrastructure delivery or biodiversity mitigation but may qualify for 'fast track for beauty'.

Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.

Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.

Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century.

Proposal 18: To complement our planning reforms, we will facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.

THERE ARE NO QUESTIONS ASKED ON THESE PROPOSALS

BBPC is concerned that the White Paper does not give sufficient priority to the pressing needs to ensure new development meets net zero requirements immediately rather than a weak commitment for compliance by 2050. Carbon emissions need reducing quickly if commitments in the Paris Agreement are to be met.

The energy efficiency proposals hardly reflect the Climate Emergency declared by government last year. Rather than new homes being "zero carbon ready" from 2025, they should be "zero carbon". Moreover, the White Paper focuses on new homes. We will not meet the carbon reduction target through new homes alone. Policies to improve the energy efficiency of all homes should be developed urgently.

Q21. 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]

Currently the need in the Parish is for more affordable housing and public transport, but this will doubtless change over time. A balance responsive to change is needed, as with the current system.

Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.

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? [Yes / No / Not sure. Please provide supporting statement.] Q22(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] 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? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.] Q22(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.]

The planning process is essentially a mechanism for seeking and gaining the approval of local communities for a specified development. Part of the process involves a negotiation that identifies and seeks recompense for the known consequences/ impacts a given development will have on local infrastructure and environment – Translating this complex local negotiation into a fixed infrastructure Levy will simplify the process but it is unclear whether local communities will be better off in terms of the contributions received from development toward much needed infrastructure or addressing local issues such as housing affordability.

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 that they will still not provide sufficient funding for all the infrastructure required.

Allowing for variation in how levy payments are set will be important in order to maximise the potential gain from development in the more viable areas and avoid blocking development in the less viable (costly to develop) areas.

The levy should be applied to all new development. The current thresholds and exemptions should be removed.

Changing payment of contributions to the end of the development process may help developer cashflow but may 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 occupation of properties is not likely to be sufficient if the harm has taken place at the start of building. Stage payments through the development process, including modest payments at the outset, should be considered.

***Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision***

*Developer contributions currently deliver around half of all affordable housing, most of which is delivered on-site. It is important that the reformed approach will continue to deliver on-site affordable housing at least at present levels.*

*Affordable housing provision is currently secured by local authorities via Section 106, but the Community Infrastructure Levy cannot be spent on it. With Section 106 planning obligations removed, we propose that under the Infrastructure Levy, authorities would be able to use funds raised through the levy to secure affordable housing.*

*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?*

**BBPC response – Yes**

BBPC supports all efforts to ensure that new housing development in Burton Bradstock should provide affordable housing that delivers local housing need. The proposed changes to the planning system should look to achieve a better fit between local housing need and local housing development – the current system is not working for local families stuck with lower than average incomes in an area where house prices demand higher than average prices.

The new system should include a mechanism where levy contributions may be taken “in kind” in the form of land transfer to the local authority or a community land trust for the development of affordable housing according to local requirements, rather than needing to accept homes built by the developer.