

MATTISHALL PARISH COUNCIL

Below are the responses from Mattishall Parish Council to the online survey for the government consultation “changes to the current planning system”. The deadline for this survey is 1 October 2020.



<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

In response to the specific questions within the consultation document:

Q1: Do you agree that planning guidance should be amended to specify that the appropriate baseline for the standard method is *whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10 year period?*

It is accepted that clarity needs to be given to each LPA on the number of houses to be planned for. This should consider the latest ONS Household projection figures. However, of overriding importance is that the figure adopted by each LPA should fundamentally reflect local conditions and local need. Mattishall Parish Council regards the proposed methodology (algorithm) to be flawed. Breckland would be faced with a near 75% increase in housing numbers (up from 661 pa to 1,070 pa)- an increase that:

- a. cannot be supported by the local economy
- b. would have a severely negative impact on the environment
- c. does not take into account the economic effect of BREXIT, and the likely increased demand for high quality agricultural land to meet the UK's food needs
- d. does not take into account the effects of Covid 19
- e. would further stress the already inadequate infrastructure, both hard and social. The proposals give us no confidence that sufficient resources would be available to meet these infrastructure needs.
- f. Without a cap the proposed figure could be exceeded
- g. Does not take account of the fact that Breckland District Council has recently (2019) adopted a Local Plan that followed extensive consultation with its Parish Councils. Mattishall Parish Council, (at considerable financial cost) has prepared a Neighbourhood Plan reflecting the housing numbers within the Local Plan.

More information is required on how the housing numbers were calculated and how, if at all, they took into consideration local constraints and wider market considerations.

Consistent with the government's objective of taking into consideration local views, what arrangements are being proposed to enable the housing figures to be appealed?

These proposals include nothing to address a key concern of Mattishall Parish Council- that there are no measures to ensure that current, extant approvals are delivered.

If the proposed housing figures for our District are mandated then this will require a significant change, and relaxation, in the current development strategy including a major emphasis on small and medium sized sites.

Proposed development of this magnitude will have serious sustainability issues in our rural parish in respect of access to public transport, schools, health provision and general amenities. The likely loss of high-quality agricultural land is fundamentally unacceptable to our Parish.

Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

Please see response to Q1. The Parish Council does not have the resources to extrapolate the implications of this element of the proposed methodology.

Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not please explain why?

Mattishall Parish, within Breckland District displays a complex number of factors that affect the local housing market. ONS figures show that wage rates for jobs based within the District are below the national average, and therefore there is, out of necessity a demand from local residents for affordable/ social housing. However, a considerable proportion of the local population access above average wage jobs outside the district and sustain a demand for higher priced housing. The District Council, supported by its Parishes is best placed therefore to access housing need, housing tenure type and specific site allocations, rather than via a centrally imposed flawed algorithm.

Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not please explain why.

Yes. Mattishall Parish Council believes that a proportion of new housing should be truly affordable.

Q5: Do you agree that affordability is given appropriate weighting within the standard method? If not, please explain why?

No. A crude percentage discount on market value does not acknowledge the low wage rate within Breckland, and therefore current "affordable housing" excludes a significant proportion of local prospective homebuyers.

Q6: Authorities which are already at the second stage of the Strategic plan consultation (Reg 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?

No comment to make.

Q7: Authorities close to publishing their second stage consultation (Reg 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate. If not, please explain why. Are there any particular circumstances which need to be catered for?

No comment to make.

Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through

developer contributions? Please provide reasons and / or evidence for your views (if possible):

- i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.**
- ii) Negotiation between a local authority and developer.**
- iii) Other (please specify)**

The concept of First Homes is to be welcomed. However, should the proposal for a minimum of 40 or 50 homes to trigger the affordable homes requirement to be accepted, this would exclude the majority of new sites within Breckland. Since 2016 Breckland would have lost 30% of affordable homes had the threshold been increased to 40 or more.

Mattishall Parish Council would welcome the government proposing that First Homes be sold with a proviso that if resold this should be at a restricted price, say 75% of market value- thereby ensuring these houses remain as affordable stock.

With regards to current exemptions from delivery of affordable home ownership products:

Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to this First Homes requirement?

No comment.

Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.

See above

Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.

See above

Q12. Do you agree with the proposed approach to transitional arrangements set out above?

No comment.

Q13. Do you agree with the proposed approach to different levels of discount?

See response to Q8

Q14. Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?

See above

Q15. Do you agree with the removal of the site size threshold set out in NPPF?

No comment

Q16. Do you agree that the First Homes exception sites policy should not apply in designated rural areas?

No

For each of these questions, please provide reasons and / or evidence for your views (if possible):

Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period? (see question 18 for comments on level of threshold)

No

Q18: What is the appropriate level of small sites threshold?

i) Up to 40 homes

ii) Up to 50 homes

iii) Other (please specify)

The majority of new housing sites in our area are of 50 dwellings and below. To raise the threshold would therefore massively reduce the availability of affordable housing. There appears to be no evidence given to support the claim that SME housebuilders are in need of short term financial support.

The current Breckland threshold of up to 10 is supported by Mattishall Parish Council.

Q19: Do you agree with the proposed approach to the site size threshold?

No.

Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?

No

Q21: Do you agree with the proposed approach to minimising threshold effects?

No

Q22. Do you agree with the Government's proposed approach to setting thresholds in rural areas?

We support any policy initiative that delivers truly affordable homes in our rural area. We would support the designation of Breckland District as one where a lower threshold of five or less be incorporated in their local plan. This would need to be supported by the Planning Inspectorate at any subsequent appeals.

Q23. Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?

Housebuilders should be required to deliver on their proposals/approvals. At the planning permission stage, approvals should be conditioned that development completion be achieved within a prescribed timescale (say three years). Breckland District has extant approvals for a

significant number of dwellings. The planning process (supported by Planning Inspectorate) should be able to enforce completions within an acceptable timeframe. i.e. a concerted approach to ending “land-banking”.

Q24. Do you agree that the new Permission in Principle should remove the restriction on major development?

No comment

Q25. Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.

There is a need to balance new housebuilding with economic development. Not all brownfield sites should be allocated to housing, especially those sites that were previously in commercial use.

Q26. Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

No comment

Q27. Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.

No comment

Q28. Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:

- i) required to publish a notice in a local newspaper?**
- ii) subject to a general requirement to publicise the application or iii) both?**
- iv) disagree**

If you disagree, please state your reasons.

This Parish Council believes that there is a general lack of wider understanding as to how the planning process operates. Any proposal to more widely publicise planning issues is to be welcomed. Advertisements in local newspapers is certainly not the way most people access information. The government needs to recognise that social media and electronic communication are the means by which many people receive information. Local planning authorities should be empowered to communicate directly with its residents electronically. Equally, many residents do not have access to electronic means, and traditional communication methods- cascading via Parish Councils, for example, are still relevant.

Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?

No comment

Q30: What level of flat fee do you consider appropriate, and why?

No comment

Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.

Yes

Q32: What guidance would help support applicants and local planning authorities to make decisions about Planning in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.

LPAs should take into account policies agreed in their local plans and Neighbourhood Plans.

Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?

No comment.

Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.

The serious danger is that these proposals lead to further land banking. See previous response and reference to the significant number of extant approvals in our district.

Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty?

No comment.