

Date: 16th October 2020

Robert Courts MP

By Email

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Dear Mr. Courts,

Standlake Parish Council Response to 'Planning For The Future White Paper

Standlake Parish Council, having examined the White Paper and the 26 point consultation document, finds itself unable to engage with the majority of consultation questions which require a greater technical knowledge of many of the issues than is available to the council. Therefore, the council sets out below its response in general to the proposals and asks that these be considered in your response to the consultation.

According to the Local Government Association there are approximately one million approved planning applications on which building works have not been started: the association also notes that some 90% of applications are approved. Therefore, this begs the question as to why the necessity for the wide ranging and fundamental changes being proposed in the White Paper? One of the problems seems to be developers buying up land, obtaining outline or full planning permission and then sitting on the land waiting for the inevitable increase in house prices before building. There appear to be no legal sanctions, such as the imposition of taxes or fines, to make this practice unattractive to the developer.

The paper talks of introducing zones (growth, renewal, or protection) with 'streamlining of local input' (whatever that may mean, but clearly implies much less notice being taken of local opinion and requirements. Despite assurances, the improvement (or indeed the provision) of infrastructure to support development has been insufficient, or absent, particularly in smaller developments which can have a disproportionate adverse effect on communities.

The imposition of top-down means that allocation of housing will be decided by central government and not by local representatives., apparently using an algorithm, which seems not to take into account where housing is actually needed (vis-à-vis growth) but on relative house prices meaning the higher the house prices the more houses to be built. This would clearly benefit builders and bring more people to the local area rather than address existing, local, needs. In West Oxfordshire we saw this in the raft of speculative development in the hiatus before the current local plan was signed.

There are concerns about the provision of low cost/affordable housing. The paper implies that the requirement to provide a proportion of this housing in developer's plans will be removed for 'small builders' but there is no definition of 'small'. This is concerning, particularly in an area of high house prices such as West Oxfordshire. Furthermore there is no mention of the provision of social housing which is desperately needed to accommodate households who cannot afford to buy and are forced into the private rental sector which can lead to being in an uncertain, and sometimes precarious, situation.

Notwithstanding the many proposals in the paper that clearly would be beneficial, such as digital access to all planning papers, setting of minimum design standards etc. the main concern must be the loss of local democracy. This council is in complete agreement with CPRE's assessment of the situation which is as follows:

- Community engagement would be largely restricted to the Local Plan making stage (as it stands, just one six-week consultation!), with the public thereafter losing their ability to scrutinise most individual planning applications.
- The introduction of a zonal planning system also raises questions. Would the zoning have to take more account of the number of houses to be built than it would of the need to protect the environment? How could broad brush zoning work in a crowded island where environmental assets are mingled with development? How will it impact on broader plans such as Oxfordshire 2050? How will our Neighbourhood Plans be affected? None of these matters are addressed.
- Development management policies, which cover issues such as noise, air and light pollution, rights of way and heritage, would all be set centrally with no apparent scope for local place-based planning.
- New settlements, such as garden towns and villages, would be taken out of the Local Plan system and be considered under national infrastructure rule

This council is also in agreement with CPRE's identification of the risks to the countryside and green spaces as follows:

As proposed, the zonal planning system would weaken protection of green space designated for growth or renewal, and offer no additional safeguards for those earmarked for protection. 'Protected' areas as defined by the new proposals would be those with site designations such as the Oxford Green Belt, our three Areas of Outstanding Natural Beauty (AONBs) and Conservation Areas, but there would be no consideration given to the importance of undesignated green spaces near to where people live. Under the proposed zonal system, and in combination with centralised, high housing targets, these green spaces will be under increased threat of becoming a free-for-all for development. The result of this will be the loss of the crucial functions that green space serves to local communities in terms of health and wellbeing, in addition to its role in mitigating the climate emergency.

In summary, this White Paper has the following major faults:

- The proposed system is un-democratic.
- It does not address the present situation of a vast bank of approved planning applications that are not being built. 90% of applications are approved under the current system.
- The algorithm to decide where houses are to be built does not take into consideration where houses are needed but on house prices; this is contrary to what is actually needed in future planning.
- The provision of low cost/starter homes is not properly addressed and the any mention of the provision of social housing is absent.
- Local democracy is almost relegated to a rubber-stamping role once the zones have been established and this is not acceptable.
- The proposed zonal system weakens the protection of the countryside and will lead to the loss of green spaces.

The council urges you to take these concerns on board and to ensure that they are taken into consideration when making your response to this White Paper.



David C Bevan
Clerk to Standlake Parish Council

CC Rt. Hon. Robert Jenrick MP, Secretary of State for Housing, Communities and Local Government
CC Cllr. Ian Hudspeth, Leader Oxfordshire County Council;
CC Cllr. James Mills, Leader West Oxfordshire District Council