

## **PILLAR 1 – PLANNING FOR DEVELOPMENT**

### **PROPOSAL 1 - Simplification of Local plans**

*Q5. Do you agree that Local Plans should be simplified in line with our proposals?*

#### **NO**

This proposal would make decision-making more remote from local people in that policies are determined at the plan-making stage, which local people are seldom interested or involved in, rather than at individual application stage which affects them directly.

Local plans, once approved, are valid for years, and, over time, may be overtaken by events, but this proposal provides no opportunity for applications to be considered in the light of circumstances at the time.

On the other hand, Neighbourhood plans which take a great deal of local work, currently have a very limited life and can be ignored as “outdated” after only a couple of years.

There would no longer be any chance for local people to be heard in person.

An increased role for national plans would lead to a “one size fits all” approach where policies centrally imposed would fail to take local character and sense of place into account.

The three proposed categories are likely to give a misleading impression of simplicity and certainty in some cases. For instance, in Char Valley, the whole parish is in the Dorset AONB and therefore crudely ‘protected’ but if the current planning system is retained for this protected area, it will still be possible for the AONB status to be over-ridden by the centrally-imposed national housing targets which take no account of local circumstances.

### **PROPOSAL 2 - National General Development Policies**

*Q6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?*

#### **NO**

England is a very diverse country and national policies will inevitably not suit all areas. Local input into Local and Neighbourhood plans is essential.

### **PROPOSAL 3 - National “sustainable development “**

*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?*

#### **NO**

Sustainable development definitions are likely to be inappropriate in some areas and are insufficiently defined in the proposal. “to include considerations of environmental impact “is a wholly inadequate nod to the need to support biodiversity and respond to the climate emergency. Again, such policies need to be local.

### **PROPOSAL 4 - A standard method of setting development targets.**

#### **Proposal 4 (cont)**

*Q8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?*

#### **NO**

We do not believe that this is the right way to get appropriate development in local areas. Any targets need to take local circumstances fully into account. For instance, we believe that more affordable housing is needed for local people in Char Valley, but a purely numbers-based area target could lead to the building of yet more expensive homes for sale.

#### **PROPOSAL 6 - Streamlining and digital tech**

*Q10. Do you agree with our proposals to make decision-making faster and more certain?*

#### **NOT SURE**

The priority given to speed and certainty could, in some cases, prevent proper consideration of complex issues. We believe it is more important to make the right decisions than to make them fast.

Use of digital technology is generally desirable but only if those without internet access (an appreciable number in our rural parish) can be fully included in all consultations.

#### **PROPOSAL 7 - Accessible map-based web-based Local plans**

*Q11. Do you agree with our proposals for accessible, web-based Local Plans?*

**YES**, provided that those without internet access can be properly informed. A standard national format may not be suitable in all cases.

#### **PROPOSAL 8 - 30-month statutory timescale**

*Q12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?*

#### **NO.**

We believe is unrealistic to think that a robust plan can be produced to that timescale in all cases. Authorities should be able to ask for, and obtain, an extension where necessary.

#### **PROPOSAL 9 - Retention of Neighbourhood plans.**

*Q13. Do you agree that Neighbourhood Plans should be retained in the reformed planning system?*

#### **NOT SURE**

We believe that Neighbourhood Plans can be a valuable way of involving the local community, but their usefulness is limited under the current system. For instance, a Neighbourhood plan can apparently be over-ridden if it is more than 2 years old. Greater weight needs to be given to approved Neighbourhood plans if the community is to feel that the effort of producing them has been worthwhile.

### **PILLAR 2 - DESIGN**

**PROPOSAL 11 - Design guidance** *Q17. Do you agree with our proposals for improving the production and use of design guides and codes?*

## **PROPOSAL 11 (cont)**

### **NOT SURE**

We welcome an increased emphasis on design, but criteria for “beauty” and sustainability are very subjective. We would want to avoid ‘Style police’.

In Char Valley each village has its own distinctive character and sense of place. It is unlikely that style guides and pattern books would ensure good development at this scale and their rigid application would tend to stifle creativity.

### **PROPOSAL 12 - Appointment of design officers**

*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?*

### **NOT SURE**

As above, the emphasis on design is welcome, but this proposal risks creating another layer of bureaucracy

Mention of “provably-popular design codes” implies a possible levelling-down of expectations.

Creation of new chief officer posts would add a further financial burden on Local Authorities.

## **PILLAR 3 - PLANNING FOR INFRASTRUCTURE AND CONNECTED PLACES**

### **PROPOSAL 14 - A fast track for Beauty**

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

### **NO**

This is very dangerous idea because visions of ‘beauty’ are so subjective and so closely tied to the surroundings of a development. Who decides what is beautiful? What is excellent in one context could be quite the opposite in another.

### **PROPOSALS 15,16, 17,18**

*(No questions)*

These seem to be general aspirations rather than policies. It is impossible to comment at this stage until more specific proposals are put forward.

All these proposals seem to have been hastily included without much commitment or thought in order to demonstrate that the Govt is aware that action is needed. The 2050 date is hugely unambitious.

**Proposal 15** – The proposal is not clear. Does the word ‘areas’ refer to places or topics?

**Proposal 16** - A quicker, simpler, framework sounds desirable but there is nothing to define what this would be.

**Proposal 17** - Historic buildings obviously do need to be conserved, but what enhancement is proposed? How would ‘enhancement’ be defined?

**Proposal 18** - Energy efficiency standards. We should be aiming to raise energy efficiency standards much more, much earlier, to help combat climate change.

**PROPOSAL 24** - Stronger enforcement powers and sanctions.  
*(No question)*

We agree that more effective enforcement is desirable, but only if local communities are given an adequate say in the system being enforced.