

MINUTES OF THE PLANNING AND DEVELOPMENT COMMITTEE MEETING HELD ON THE 30TH SEPTEMBER 2020 AT 7.00 PM VIA ZOOM SOFTWARE AND AT 95 HIGH STREET.

Present: Councillors: Mrs C Allen (Chairman), JK Hall (Vice Chairman), G Sisley, S Anderson, Mrs E Lord, E Simons.

Also in attendance: Councillor M Smith.

1. APOLOGIES FOR ABSENCE

Councillors P Wooddisse and Miss V Webb sent their apologies for the meeting.

2. TO RECORD MEMBERS DECLARATIONS OF PECUNIARY INTEREST

There were no declarations of Councillors interest declared.

3. TO APPROVE THE MINUTES OF THE PREVIOUS MEETING HELD ON THE 24TH AUGUST 2020

The minutes of the meeting held on 24TH August 2020 were approved and signed as a true record of the proceedings of that meeting, with the addition of:-

20/00621/OUT Land South of White Hill, Kinver
Outline planning for residential development of up to 40 houses, vehicle access, public open space and drainage and ancillary works.

Additional comment: the land when sold in individual plots should be freehold land not leasehold land.

4. TO NOTE ANY ENFORCEMENT MATTERS RECEIVED

Correspondence was noted re query relating to works at Foresters Lodge, Stourton.

5. PLANNING APPLICATIONS

20/00654/TREE 70-71 High Street, Kinver
Crown reduce a weeping willow

Refer to S Does.

20/00682/FUL 1 the Acre Bungalow, The Acre, Kinver
Erection of free standing timber garage

Recommend Approval subject to complying with Conservation Regulations and a S106 should be placed on the garage so that it remains as part of the curtilidge of the bungalow and should not be allowed to be converted into a separate dwelling.

20/00662/FUL 13 Bridgnorth Road, Stourton
Alterations to front elevation of dwelling house and conversion of existing garage to an annex flat.

We note that this garage adjoins the neighbours property and we are concerned that developing this garage may cause issues for that property and there is a concern over the loss of light to that property.

If this application is approved then we would request that a S106 should be placed on the garage so that it remains as part of the curtilage of the house and should not be allowed to be converted into a separate dwelling.

20/00742/FUL 9 Huntsmans Drive, Kinver
New dwelling (Roof alteration following approval 19/00442/FUL)

Recommend Approval

20/00766/FUL 1 Compton Close Kinver
Enclosure of front porch, conversion of existing garage into living accommodation, replacement of car port with new store for bikes and other external refurbishment including rendering, new windows and new doors.

Recommend Refusal on the grounds that there is limited parking in that area on the road and they will now only have 1 parking space within the curtilage of the site.

20/00763/FUL 12 Forest Drive, Kinver
Single storey rear extension, first floor rear extension, part garage conversion and loft conversion

Recommend Approval

20/00792/VAR 3 Lockside Drive, Kinver
Variation of condition 12 (construction management plan) of approval 17/00845/Ful to alter parking layout.

Recommend Approval

6. PLANNING DECISIONS REACHED BY SOUTH STAFFORDSHIRE DISTRICT COUNCIL

The Planning decisions are set out as appendix 1 to these minutes were noted.

7. TO DISCUSS ANY FURTHER ACTION REQUIRED FOR THE NEIGHBOURHOOD PLAN

The Working Party for the Neighbourhood Plan met via zoom brief notes are below:-

Present: Christine Allen, Eunice Lord, Mark Smith, Steve Anderson, Mark Smith, Virginia Webb and Louise Kirkup, G Sisley.

Suggested steering group is a core of 5 Councillors with 2-3 other members of the Community that drop in and out of the process as required. Maximum of 8

Other members would be business owners, groups such as Civic and Historical societies.

Suggested to involve people at an early stage of the process rather than it being after major discussions have taken place.

Key Themes

Housing

Required an affordable housing survey – possibly get the Housing Association to work with the Council on this

Affordable housing can mean – buy, rent, shared ownership, shared equity...

Greenbelt exception sites for affordable housing may be included (such as the Swindon site).

Conservation and design

SSDC should have a village design guide that they work too, but members felt this was an important part of our plan for us to include.

Members are sceptical that house builders are only giving lip service to eco friendlier designs of houses and doing the basics of their designs.

A list of all Heritage assets such as sand stone car garages etc needs to be prepared, Christine Allen will speak to Ed Simons on this matter.

The SAD process that has already approved sites will not be able to be tackled by using our Neighbourhood Plan as those sites have been chosen.. However, the plan could be used to help with the design of properties etc.

The plan can only be referred to when it has been completed and published. However due to the Corona Virus, referendums cant take place until next year, so any plans that have been prepared to that stage can be referred to.

Economy facilities

The Plan can include uniform or specific style type for shop fronts, this would be with consultation with local businesses.

Look at having a general space for meetings or hiring for local people, especially in light of people working from home. I.e. Spar perfect space.

Tourist area – promotion

Speak to local sports clubs and societies to ask what their plans are for the future what growth they would like to achieve. This information is then helpful for if developments happen for the developer to contribute

To these projects.

Natural Environment

Look at Green spaces to make special areas of interest, Wildlife Trusts may be able to help with surveys they have undertaken.

SSDC should prepare a screening opinion on the Strategic Environmental Assessment, they should be contacted now to get agreement and then this is prepared after the draft plan is in place. We need to contact National Trust, Canals and Rivers Trust, Worcestershire and Staffordshire Wildlife trust to help with the environmental assessment data.

If it is required ACOM can produce a detailed report.

Contacting Local history groups to also increase knowledge base.

Accessibility

Plan cant look at reducing speed limits within the Parish.

Can look at Public transport requirements, issues and options on parking, schemes such as park and stride

Anything else

Climate emergency – zero carbon agenda

Environment design and sustainability

Flooding – may be better addressed through SSDC – but extreme weather will have an impact.

For Louise only have 1 point of contact which will be Eunice, if she is not available then Christine will contact.

Meetings scheduled for Friday 2nd October at 9.30 to run through application form with Eunice, Jenny and Christine.

Agreed to have a main topic / agenda per meeting to discuss in detail.

Next meetings 7th October 6.00pm and then 14th October at 7.00pm.

The District Council have now approved the designated area so the grant application can now be submitted.

8. TO NOTE OR COMMENT ON ANY APPEAL NOTIFICATIONS

The following appeal decision has been received:-

Appeal Ref: APP/C3430/W/20/3251508

Former Royal British Legion off Sterrymere Gardens, Kinver DY7 6ET

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The application Ref 18/00921/FUL, dated 9 November 2018, was refused by notice dated 19 March 2020.
 - The development proposed is the demolition of a derelict former social club and the construction of a new residential apartment block.
- Decision 1. The appeal is dismissed.

This was noted, the Clerk will try to find out what impact this now has on the site, if there is a standing planning permission in place for the site and request that the site is tidied up as it is an eyesore in the Greenbelt buffer zone.

9. TO DISCUSS / COMMENT ON THE GOVERNMENT CONSULTATIONS RELATING TO PLANNING

Councillor Mrs E Lord prepared 2 draft responses on the following papers the responses are attached as appendices to these minutes:-

Proposed Changes to Current System - consultation closing 1st October

Appendix 3 to the minutes of the Planning and Development Committee held on the 30TH September 2020

White Paper Proposals - Consultation closing 28th October

Appendix 2 to the minutes of the Planning and Development Committee held on the 30TH September 2020

It was agreed that Councillor Mrs E Lord will add any relevant comments from members of the Committee and forward it to the Clerk for submission by the deadline date.

10. ITEMS FOR FUTURE AGENDA

To be with Clerk by the 21st October 2020.

11. DATE OF NEXT MEETING

The date of the next meeting was noted as the 28th October 2020.

12. RECOMMENDATIONS TO THE PARISH COUNCIL

The following recommendations were put to the Parish Council next meeting that the planning recommendations as set out in agenda item 5 .

Appendix 1 to the minutes of the Planning and Development Committee held on the 30TH September 2020

| | | | |
|--------------|--|------|-----------|
| 20/00514/FUL | 2 Enville Road, Kinver Ground floor side extension to replace existing extension to create larger porch / kitchen and new utility room. | App | Rec App. |
| 20/00600/COU | Hideaway Cottage, Horse Bridge, Kinver Change of use from holiday let to residential | App. | Rec App. |
| 20/00498/FUL | 86 Hyperion Road, Stourton To remove conifer hedge up to 3m tall with wooden feather board fence 2 metres tall | App. | Rec App. |
| 20/00476/FUL | 2 Field View, Dunsley Road, Kinver Double storey extension to rear | Ref. | Comments. |
| 20/00476/FUL | Mile Flat House, Mile Flat, Kingswinford 2 storey side extension and single storey rear ext. | App. | Rec App. |
| 20/00160/FUL | Kinver Constitutional Club, 119 High Street, Proposed smoking shelter and raised decking area (retrospective) | Ref. | Rec App. |
| 19/00603/FUL | Kinver Constitutional Club, 119 High Street, Proposed small public bar for occasional use | App. | Rec App. |
| 20/00521/LUP | 42 Stourton Crescent, Stourton Construction of rear single storey flat roof ext. | App. | |
| 20/00549/FUL | 28 Stourton Crescent, Stourton Proposed front porch extension and replacement of existing windows | App. | Rec App. |
| 20/00533/FUL | 5 Roundhill Farm Cottages, Whittington Hall Lane, Proposed 2 storey side extension and single storey rear extension | App. | Rec App. |
| 20/00531/FUL | 161 Bridgnorth Road, Stourton Single storey rear and two storey side extension | App. | Rec App. |
| 20/00620/FUL | Covert Cottage, Iverley Minor amendment to approval 20/00020/FUL. Existing rear hipped roof modified to glazed gable. | App. | Rec App. |
| 20/00126/FUL | Kings Lodge, Bridgnorth Road, Stourton Relocation of existing access | App. | Rec Ref. |

| | | | |
|--------------|---|---------------|----------|
| 20/00043/FUL | KSCA, Kinver Creation of new entrance and toilet extension, re roofing and rear terrace with internal alterations | App. | Rec App. |
| 20/00589/LUP | Estate Cottage, Wolverhampton Road, Stourton Construction of single storey, pitched roof, detached garage with rain water drainage connected to either existing water drainage system or new soakaway located in adjacent garden. | App. | |
| 20/00382/FUL | 177 Enville Road, Kinver Proposed detached vehicle garage | App withdrawn | |

7/9

White Paper Proposals - Consultation closing 28th October

Summary

We agree the planning system is over-complex, out of date and in need of reform, not providing many people with the homes they need and failing to value the climate, biodiversity or creating better communities.

However this white paper takes the wrong approach and indeed makes the wrong assumptions about what is actually wrong with the system, failing to look properly at the evidence and to understand the reasons for failed delivery of housing. It is a missed opportunity to address climate change, rebuild ecosystems and to bring forward proven solutions to the housing crisis including investment in local authority house building. It seeks simple answers without understanding the complexity of the problems. It is not based on the evidence available. It should not have been presented as a White Paper as it is nowhere near ready for legislation - it is entirely lacking in the detail in key areas.

We are opposed to this over-centralised approach which will damage local democracy and take away local control. This in turn can damage the reputation and confidence of the standing of property developers and the planning system in the local community. The failures including around infrastructure provision will have a detrimental effect on good neighbourhoods.

Climate change & Biodiversity:

There is a fundamental failure to place carbon reduction front and centre. Alongside the 10% net gain in biodiversity, there should be an **equivalent commitment to carbon reduction**. Every development should not only be carbon neutral but should be generating more power than it uses. The current proposal to be '**carbon net zero-ready by 2050**' is simply not good enough.

The white paper is strangely silent on transport and the all-important need for the planning system to ensure that development takes place only in sustainable places with a commitment to a major shift from car journeys to sustainable modes of transport. Planning policy has a crucial impact on tackling climate change by building the right homes in the right place, with minimal use of resources for travelling between the concepts of home and work. All new homes should be designed suitably for working from home.

The replacement system of environmental assessments is deeply concerning, as there is no detail or even sense of importance about making these work better. A clear straightforward means of

assessment that assesses carbon impact, constraints including flooding and air quality issues is needed.

Whilst the commitment to Biodiversity net gain is welcomed, we need to go much further, acknowledging the need for policy to address our biodiversity emergency, and catastrophic species loss in which land use - and loss - plays a crucial role. The metrics for Biodiversity net gain need to ensure we fully recognise the importance of no loss of a particular species loss or a long-established habitat such as ancient woodlands or wetlands in assessment of areas for development (not just assuming that for example an ancient woodland cannot simply be 'replaced' elsewhere).

The design codes proposed seem to be centred around beauty at the expense of sustainability and takes a gimmicky approach. Tree-lined streets are welcome but are not enough. In any case they must be the right species in the right place that will survive rising temperatures and not damage pavements.

Current local planning systems are one of the most effective ways for local authorities to tackle climate change. It is vital that the local design codes proposed are not restricted to dealing with appearance and 'beauty'. Beauty is important but in any case hard to legislate for and can lead to pastiche. Lack of beauty is important - but not the biggest crisis facing us.

Design codes - both local and national - must allow for meaningful action on sustainability including local requirements for carbon neutrality in buildings, biodiversity, construction methods, and for infrastructure planning that puts requirements for walking, cycling and proximity to public transport at the heart to create liveable communities. They should be genuinely locally driven - this will not be achieved through a centralised system reliant on 'machine reading' instead of human planners.

Climate change will not be solved by using a more attractive cladding.

On Community Infrastructure Levy (CIL) reform, the new levy should not only be based on the type of housing but on the carbon and environmental credentials of a building and site, effectively offering a discount to those developers that build to the highest environmental standards and incentivising doing the right thing.

We are also concerned that the new infrastructure levy as proposed could be siphoned into non-infrastructure spending

- 1 Bundling affordable housing in with infrastructure - when it isn't - could reduce the amount of affordable housing provided (an impact compounded by the proposed changes to the

current system - see our consultation response to changes to the current planning system)

- 2 We are opposed to the suggestion that infrastructure levy could be used for other types of spend, unrelated to development and even 'council tax reduction' .

Affordable housing spend must be prioritised, and infrastructure spending must be ring fenced for the infrastructure needed to enable development and especially infrastructure for low carbon living and increased biodiversity e.g.

- 0 Grid upgrades
- 1 Provision of renewable energy including solar PV on all roofs as standard
- 2 Rural and urban sustainable drainage
- 3 Climate change adaptation
- 4 Walking and cycle routes
- 5 Public transport
- 6 Schools, health & social care facilities
- 7 Community & cultural space
- 8 Local shops
- 9 Parks and green spaces
- 10 Allotments & other food growing space

If the new Infrastructure Levy is to be based on the value of the development, areas with low house values will lose out. This will work against 'levelling up'. There is some justification for higher levies where there are high house values, as the high cost of land will also mean higher costs for providing infrastructure (and affordable housing) but this needs to be balanced. Any formula should take into account income and affordability, not just be set at a flat rate across the county.

If reform goes ahead we must see:

- 11 Local design codes need to be able to incorporate areas which are currently set through local planning policy. They should not be purely about appearance and 'beauty' but allow rules addressing the climate emergency e.g. carbon zero building, transport design, building waste and packaging and materials minimisation.
- 12 The energy efficiency standards required at national level are much greater than those proposed - requiring generation - or at the very least fully zero carbon.
- 13 Rigorous environmental assessment.
- 14 Meaningful biodiversity net gain which recognises species loss and the nature emergency
- 15 Infrastructure contributions should incentivise high environmental standards.
- 16 The infrastructure levy ring fenced for infrastructure especially low carbon infrastructure

and balanced to ensure levelling up not levelling down.

- 17 There needs to be the option to include conditions around the process of construction e.g. traffic and site management.

Use of land and meeting everyone's housing needs

Failure to address the real barriers to house building - the need for land value tax, penalties for land-banking, resourcing of planning authorities and to invest in good quality council housing.

These proposals could lead to a proliferation of greenfield, out of town, car-driven developments which are loved by both the development industry and the land-selling industry because they maximise profits for both these industries. These dormitory housing estates are far less sustainable than brownfield development near existing transport and services and are often unpopular with communities as they take away precious open farmland and green space, as well as harbouring the potential for social isolation problems.

There is also clear evidence that the best way to bring about more and better housing of the kind needed by our communities, whilst at the same time stimulating our economy post Covid, is to make finance available to local authorities to build council housing and this white paper is a wasted opportunity to bring this about. We need to see a serious approach to affordable housing which also encompasses withdrawing the right to buy legislation. A proper definition of affordable housing is also required. The paper aims to provide at least as much affordable housing as under the current system but should be much more ambitious than that - particularly as regards affordable rented housing.

The white paper fails to address the failure of the house building industry to bring forward developments which have been given permission but which developers are failing to build out, instead 'land banking'.

There is a gap around ensuring continued investment in affordable homes provided by community land trusts.

Additionally, we are concerned that the problem of systematic cuts from government leading to under-resourcing of local authority planning departments is not acknowledged or addressed. On top of the existing deficit, undertaking wholesale planning reform will require additional resources. There must be sufficient revenue to fund local authority planning departments to undertake the new requirements.

Additionally, to have any hope of success, substantial reform should not be taking place alongside a period of local government reorganisation (or 'devolution' as this is euphemistically being called) as the two things simply aren't possible alongside each other.

We believe that reforming the planning system as suggested will not get more houses built because land prices and the profit to be gained from getting planning permissions on cheap agricultural land are not being addressed.

The White Paper instead should seek:

- 18to reform the Land Compensation Act 1961
- 19enhanced CPO and land assembly powers for local authorities
- 20Incentives for developers to go ahead with construction when planning permission granted, and penalties when they don't (e.g. time limits, financial penalties)
- 21A carefully designed Land Value Tax
- 22Investment in council housing and stopping the Right to Buy policy - one counters the other
- 23Support for community land trusts
- 24Addressing the deficit in local authority planning services and additional resources to enable reform

Additionally, planning reform must not take place alongside local government reorganisation

Zoning

Concerns about 'zoning' / centralisation; democracy/accountability, and about deliverability in practice

In principle, there could be advantages to a more accessible and visual approach to local planning, if this genuinely allows communities to engage better at an earlier stage of the planning process. However, the proposals set out entirely lack detail about how this would be achieved and fail to address digital exclusion. Given the proposals were developed without reference to any expert in community involvement (or even a single local planning authority) it is not surprising that in practice the proposals are heavily skewed **against** a better deal for communities. The principles of localism appear to have been entirely abandoned. Localism needs to be embedded in the reforms, building on the work on Neighbourhood Planning that has been so successful in many parishes and towns around the country, an approach we strongly support.

We are hearing many concerns raised by both Councillors and residents in different areas of the

country about the split into Growth/ Renewal/Protected zones and how this would work in practice. These are not sufficiently nuanced.

The proposals simply do not put our communities at the heart when it comes to decision making and they tilt the balance of the planning system further in favour of large scale development and land-buying industries. The zones are too broad and do not allow for local circumstances.

Growth zones must first pass environmental assessments / sustainability tests and the current proposals do not provide a practical way for this to take place - as there is no allowance in the process for resources needed for these assessments to take place prior to allocation.

The lack of clarity on the future role of local authority planning committees is a gaping hole in the current reforms. Whilst the idea of streamlining decision making to help bring forward more homes more quickly is welcomed, this must not be at the expense of the role of local councillors, who know their areas better, in scrutinising development proposals at all stages of the planning process. There needs to be the opportunity for communities' specific comments on an actual project to be raised so they can be debated when deciding the outcome.

We are concerned that land seems to be viewed simply as a commodity, instead of a precious resource. Land - including open countryside which does not have an official designation such as an AONB - is fundamental to our lives. It is key to biodiversity, captures carbon, and is often hugely important to local residents. Additionally, smart land use for renewables, rewilding, food production etc. is key to a low-carbon future.

The importance of agricultural and food producing land must be remembered for food security.

Employment space is largely ignored which is a huge oversight. A joined up approach - that looks beyond an obsession with housing- also should consider the sustainability of future economies - with progressive design looking at '15 minute neighbourhoods' or '1 job per household' etc. Yet employment space barely features.

Waste and minerals planning should be reframed in a circular economy approach however seems to have also been forgotten in this White Paper so it is hard to comment.

Putting too much emphasis on a 'fixed' set of rules for development set at one particular moment in time means there is then no opportunity to respond through the planning system if local or national circumstances change - just as the pandemic should have taught us all about the need to retain the flexibility to adapt to changing times.

Conversely, if every single possible future scenario is planned for, design codes will become unworkably complex (as we see in other zoned areas e.g. the 1600 page New York design code) - entirely defeating the point of this reform.

This white paper is part of a centralising approach which reduces the power of local government, undermines democracy and which fails to recognise the importance of local communities and local areas who should be at the heart of effective placemaking.

We agree that the proposals would lead to greater complexity (despite the stated desire for simplifying the system) and especially the need for much greater clarity, made in the [TCPA Initial Analysis](#). If reform goes ahead some of our key requirements are:

- 25The designation of Growth and Renewal areas MUST be co-designed with local residents;
- 26Growth zones must first pass environmental assessments / sustainability tests.
- 27There needs to be additional categories in the zoning system e.g. protected to recognise the importance of open countryside and other undeveloped land separate to land which is designated as AONB, National Parks etc.
- 28There need to be additional categories of land use which will enable local areas to set local targets, for example
 - 29Renewable energy generation
 - 30Food production
 - 31Rewilding and nature
 - 32Carbon sequestration
- 33Involving people better earlier in the process must not exclude the involvement of communities later in the process as populations, and both local and national circumstances change.
- 34Digitally excluded people need to be included.
- 35Reducing the role of democratically elected councillors in the process would mean less accountability and this must not happen.
- 36There needs to be consideration given to the transition period - how do local authorities move from the current system to a future one without a policy void?
- 37Ensuring proper resources for local authorities to implement the new system
 - 38Recognising and compensating for historic under-resourcing
 - 39Ensuring local authorities have both the time and the money to provide the evidence base - and the community engagement needed for co-design that would allow them to allocate 'growth' zones, otherwise they are just fantasy

Re Neighbourhood Plans

A continuing commitment to Neighbourhood Planning is welcome however more investment is required to support communities to meet both the technical requirements and enable community participation. This should particularly focus on NPs in urban areas - as the vast proportion of NPs have been developed to date in parished rural areas.

Guidance on housing supply in NP areas should be provided, with a margin for flexibility over or under those numbers to allow especially small sites to be developed. The greater % of CIL to be allocated to an area with a NP should be maintained. The status and weighting of NP's and their policies in relation to the adopted plan should be clarified as part of any reform.

Public sector equality duty

It is disappointing that no equality impact assessment has been carried out. Despite the claim that the Government is "mindful of its responsibility" in relation to its legal duty under s.149 of the Equality Act 2010, and the fact this is described as a White Paper, there is no evidence that any steps have been taken to comply with this duty. The duty includes a "duty of inquiry" to find out the impact on groups with protected characteristics.

Disabled people face many more barriers than the general population, not just in terms of access to housing but also every aspect of their interface with the built environment. BAME populations may face additional barriers due to correlation with relative income profiles and to family size.

The PSED includes the particular duty to have due regard to the need to take steps to meet the needs of people with disabilities where they differ from the needs of those without disabilities. The White paper is silent on the integration of accessibility with development.

PSED also includes the duty to have due regard to the need to tackle prejudice and promote understanding. This may be particularly relevant, for instance, to the arrangements for affordable housing. Also with regard to Gypsy and Traveller provision - which in the White Paper has apparently been forgotten. There should be provision in every area.

The proposal should therefore not be taken forward without a full equality impact assessment.

Proposed Changes to Current System - consultation closing 1st October

Headlines:

- The proposed algorithm to set the number of new homes needed is arbitrary and in many cases undeliverable. It doesn't address the actual need for housing - right place & right size and could work against 'levelling up'.
- We oppose the centralisation of decision making on the best mix of affordable housing ie. the blanket requirement for 25% ' first homes' requirement regardless of local situation and local need. Which in many places is affordable rented housing, especially council housing
- We also oppose the change to the threshold for providing affordable rented housing - we need more affordable homes for people not fewer.
- We think expanding "permission in principle" is unnecessary: the existing system has gained little support among developers and it could continue the worst examples of poor quality development gained through expanded "permitted development" rights, through removing effective local authority control.

Unrealistic undeliverable housing numbers

We acknowledge the need to build more housing - but it must be the right housing, of the right size, in the right place. Simply deciding on an algorithm to apportion 300,000 homes per year without any evidence being produced to support this target is doomed to failure - it will be GCSE grades all over again. Sometimes there simply isn't the land available to put more housing, and dictating a target from on high isn't going to change that.

Furthermore, the focus on the "number of dwellings" does nothing to address the complexity of housing need. There is a world of difference between 300,000 executive homes and 300,000 bedsits but the proposed approach does not differentiate between these two extremes. Any targets must be broken down by size of dwelling.

Whilst the use of more up to date population estimates is welcomed, residents and councillors are deeply concerned about the impact on communities and the environment, with many reporting that the numbers allocated to their areas as a result of the changes to the standard method are simply not deliverable.

The chance should be taken to clarify the definition of housing units, for example removing ambiguity over 'co-housing' which has been exploited in some areas.

The formula is skewed towards developers and the land industry. It will encourage more development where prices are higher - and profits maximised - which disadvantages the areas where prices are lower.

[Local areas can add local detail on housing figures for their areas here]

Loss of Affordable Housing - through affordable housing threshold

We oppose the raising of the threshold for affordable housing to 40 or 50 which will directly reduce the amount of affordable housing provided by the planning system.

There is no evidence provided in the consultation or elsewhere else that this measure will achieve the desired effect of encouraging sites to come forward or benefitting smaller builders and developers. It could have unintended consequences e.g. developers may start submitting below threshold in order to avoid affordable housing obligations.

Existing rules define "small sites" as less than 10 units of housing. There have been cases where developers artificially split sites into smaller ones to avoid contributions - i.e. the abuse the Government identifies a paragraph 81. developers should not be allowed to break up large sites to enable them to deliver housing numbers just below the proposed increased threshold that avoids affordable housing obligations.

Local areas can add local detail here, e.g. how much affordable housing would have been lost in the last 5 years if the higher threshold(s) had been applied.

E.g. in Lewes District - If the threshold of 50 had been in place over the last 5 years they would have lost 81 homes – that's more than a third of the affordable housing t secured for residents through the planning system.

First Homes

We welcome the principle of requiring affordable housing and that the Local Planning Authority can increase the affordability discount - on whatever tenure - to up to 50%. however the authority

must be able to determine the mix of types of affordability.

We therefore strongly oppose the 'First Homes' proposal to require a percentage of discounted 'for sale' on affordable housing. This is a politically driven suggestion, without an evidence base, that favours ownership over renting. It would take away local control and unacceptably centralise decision making on affordable housing priorities without regard for local need. Many of the areas with the greatest housing shortages and the highest prices are in dire need of affordable rented housing, especially social housing and many local authorities are committed to responding to this need. Making a compulsory quota for sale, not affordable rent, will directly impact the ability of local authorities and housing associations to deliver much needed homes for people.

We welcome the requirement for first homes to be affordable in perpetuity. However the ability for banks to remove that requirement where a home is repossessed in order to protect their investment should not be allowed

In principle, we support the implied (though not explicit) requirement in the proposal for affordable homes to be delivered on-site but this should be strengthened to require that they are 'tenure blind' i.e. affordable homes are mixed with standard ones. Creating ghettos of "affordable housing" segregated at the edges of housing developments, or "poor doors" directly contravenes the stated aim of "happier, more rooted communities."

Extension of Permission in Principle - and note on opposition to extension of permitted development

This appears to be an unnecessary tool, with Government evidence that developers have limited understanding of the current system. It would seem to conflict with the aim of the Future Planning white paper to focus on good design and we have strong concerns it could further weaken councils' control over planning and further dilute scrutiny. We are concerned that the problems already experienced permitted development could be exacerbated if permission in principle is extended. It also seems to add yet another layer of complexity, with little advantage for developers.

There could be an advantage for local authorities in bringing forward land assembly for social housing. However, the consultation document is so light on detail about how it would be applied that it is hard to comment.

Although not included within this consultation - as it has already been bulldozed through Parliament - we would like to register that we are strongly opposed to the extension of permitted

development which evidence shows is already leading to the slums of the future.

Public sector equality duty

We are concerned that no equality impact assessment has been carried out on these proposals. Disabled people face many more barriers to adequate housing compared to the general population. BAME populations may face additional barriers due to lower average incomes and to family size.

The PSED includes the particular duty to have due regard to the need to take steps to meet the needs of people with disabilities where they differ from the needs of those without disabilities. It also includes the duty to have due regard to the need to tackle prejudice and promote understanding. This may be particularly relevant, for instance, to the arrangements for affordable housing.

The proposal should therefore not be taken forward without a full equality impact assessment.