

ASHBURY PARISH NEIGHBOURHOOD PLAN GROUP

Planning for the Future Consultation
Ministry of Housing, Communities and Local Government
3rd Floor, Fry Building
2 Marsham Street
London
SW1P 4DF

28 October 2020

Dear Sir/Madam,

The Neighbourhood Plan Group is a distinct entity within Ashbury Parish Council established in order to carry out a dual mandate: to assess and make necessary representations about all planning applications in the Parish; and to ensure that planning decisions adhere strictly to the guidelines set out in the Ashbury Neighbourhood Development Plan ('ANP'), made by Vale of White Horse District Council on 17 July 2019.

On behalf of Ashbury Parish Council, we are pleased to provide this response to the 'Planning for the Future' public consultation. Answers to the specific queries posed in the white paper follow below, but in summary:

- The need to simplify the entire planning system is not in dispute. But in trying to achieve this, there is a danger that the wider, whole picture is missed or ignored. Having only three categories is neat and therefore superficially appealing as a way of freeing up development sites, but it is hard to imagine that such a system would not de-emphasise or just ignore the less obvious but equally important planning criteria – the natural environment, sustainability and changing demographic of the enlarged community and so on. Will Conservation Areas automatically be Protected, and if so for how long?
- Digitalisation is a constant and ever more embedded part of everyday life. But it is a way to make processes more efficient, not a replacement for them. A national map showing all potential sites would be a useful tool, in combination with numerous other factors for considering where houses could be built, but it alone cannot make the decisions. Digitalisation must be whole heartedly embraced, but must not be relied upon as a panacea.
- Neighbourhood Plans are said to be valued but there is more content aligned to seeking neighbours and street input – a 'whole systems' approach to new build will be completely lost. There will be an undesirable but inevitable 'dumbing down' of both Local and Neighbourhood Plans as government policy increasingly centrally dictates what happens locally. Councillors will no longer have a say – surely a backwards step for local devolution.
- There is no system signup or contribution to this process from Transport, or any other infrastructure stakeholder. This means there is necessarily no 'wider system' approach to build at the outset and no commitment to such. Build will also need to be in the context of how 'industry' and employment patterns will unfold over the next 50 years or so and separated from a wider context.

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- Land assessment is totally devoid and separate from any mapping of infrastructure – such needs to be completed jointly – with several government departments working together.
- What is needed is more specification of and absolute direction of developers to include:
 - Flexible build
 - Energy efficient build and with sustainable materials (climate change agenda)
 - Smaller first family homes, affordable housing
 - Housing to meet any sort of disadvantaged group
 - Population profile
- The replacement of the legal soundness test with one for Statutory Sustainability is likely to open up the possibility of endless challenges and vexatious claims.

In answer to the specific questions posed (numbering as in the consultation white paper):

1. Complex, antiquated, well-intentioned.
2. (a) Yes
3. Email, as per the current system.
4. (i) Preserving and enhancing the rural character of the area.
(ii) Protecting the natural environment.
(iii) Provision of appropriate housing for local need.
5. No. The broad aim of simplification is welcome and arguably a two category classification (Development allowed Yes/No) would be better still. However, as proposed the safeguards against development near or on the edges of ‘Protected’ zones is unclear (eg: could a tower block be erected on the boundary of a Growth zone immediately adjacent to an AONB?). Further, without a significant, enhanced enforcement effort, the proposed regulations would have little power to protect valuable heritage and natural assets.
6. Streamlining – yes.
Setting out general development management policies nationally – no.
7. (a) No – a sustainability test should be in addition to the legal soundness criterion, not instead of it.
(b) No reason to remove the Duty to Cooperate test.
8. (a) Yes
(b) No – affordability and existing density are merely two of many factors that need to be considered. Demonstrable local need and demographic considerations are two examples of other key criteria.
9. (a) No – planning should not be a ‘top down’ exercise, where local people are compelled to live with decisions made centrally, far away.
(b) No – ‘Protected’ must mean ‘protected’, with no development permitted.
(c) Yes
10. Yes
11. Yes
12. Yes – there is no reason for the process to take any longer, even under the current regulations.
13. (a) Yes – neighbourhood plans should not only be retained but given greater weight as they are the only hard evidence of local needs and wishes.
(b) A standard template that covered the necessary questions could be mandated as a starting point for all neighbourhood plans.

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14. Yes
15. Ugly and poorly designed.
16. All of the goals specified.
17. Yes – however, it is not clear how non-objective restrictions like “adherence to a design code” can be enforced, and if they are, how endless appeals will be prevented.
18. Yes – however, how will a design officer apply the codes in a way that is not subjective or based on personal preference?
19. Yes
20. Yes, though here again, the enforceability remains a question mark.
21. As set out in the Ashbury Neighbourhood Plan: improved infrastructure and suitability of the proposed development in terms of local need; maintaining clustering of dwellings to prevent ‘sprawl’; respect for the architectural heritage of the historically significant neighbourhood; and meeting all sustainability targets.
22. (a) Yes, though the Levy should be defined in advance and be payable in stages throughout the construction process.
(b) Nationally at a single rate, with specified discounts/premiums to a standard rate (similar to VAT).
(c) More value. If these proposed reforms are to not lead to an unruly free-for-all, some additional constraints are required, and an uplift in cost would be one effective brake.
(d) No. It is not local authority’s role to enter into financial speculation. Levies should be payable in stages, starting with the project approval stage so that infrastructure and other improvements can be progressing in parallel with the development.
23. Yes. This is crucial to attenuate opportunistic and low-quality developments.
24. (a) No. Any Infrastructure Levy – as its name suggests – must be spent to compensate/enhance the existing community that is embracing the new development. Affordable provision must be maintained as a separate requirement.
(b) No, neither. Both options are feasible on paper but difficult to deliver in practice. Affordable housing provision must be kept separate.
(c) No. Local authorities should not be in the business of housing development speculation.
(d) Affordable housing should be built to the same specifications as the commercial units and handed over to local authorities at a pre-determined price where the developer only recoups directly incurred costs.
25. Yes. The Neighbourhood Share should be increased to 75% or higher. Any community that agrees to host a new development must see tangible, visible benefit in return for their agreement.
(a) No. The provision of affordable housing must be kept separate from any Infrastructure Levy.
26. **The diminished role of Neighbourhood Plans is a concern. It is one of the few ways in which ordinary residents were encouraged to participate in the shaping of their communities. By pursuing a reform process that essentially centralises, and applies in a top-down way, the regulations any quiet local voices that were starting to be heard will surely be drowned out. If Planning For The Future is truly a once in a generation opportunity to reform the system to be fairer, more efficient and better for all, it must pay more than just lip service to Neighbourhood Plans; it must make them the core around which the rest of the system is built.**

**ASHBURY PARISH
NEIGHBOURHOOD PLAN GROUP**

Yours sincerely,

Yoshi Nishio
Chairman
Neighbourhood Plan Group
Ashbury Parish Council

Cc: John Howell MP
Oxfordshire Neighbourhood Plans Alliance