



Woodford Neighbourhood Forum
Response to MHCLG
Planning for the Future White Paper
October 2020



Woodford
Stockport





Woodford Neighbourhood Forum

c/o Woodford Community Centre, Chester Road, Woodford, Stockport, Cheshire, SK7 1PS
Email: woodfordneighbourhood@gmail.com Web: <http://woodfordnf.co.uk>

Woodford Neighbourhood Forum Response to the White Paper: Planning for the Future

Contents

1.	Background to Woodford and Woodford Neighbourhood Forum	3
	Development in Woodford.....	3
	Woodford Neighbourhood Forum and the Woodford Neighbourhood Plan	5
2.	Advantages of local consultation and engagement in planning	6
3.	WNF general comments on the proposed planning reforms.....	8
4.	WNF Response to questions in the consultation	11
4.1	Pillar One – Planning for development.....	11
4.2	Pillar Two – Planning for beautiful and sustainable places	19
4.3	Pillar Three –Planning for infrastructure and connected places.....	22
4.4	Delivery.....	26
4.5	What happens next	27

1. Background to Woodford and Woodford Neighbourhood Forum

Development in Woodford

- 1.1 Woodford is a settlement located on the southern boundary of the Metropolitan Borough of Stockport in Greater Manchester, bordering Cheshire. The village falls within the Shropshire, Cheshire and Staffordshire Plain National Character Area, which is described as a pastoral area of rolling agricultural plain. A large proportion of Woodford is farmland. Development comprises a mixture of very low density rural housing, semi-suburban ribbon development and an idiosyncratic mixture of styles.
- 1.2 Woodford is unusual in that it is a small village of 600 houses with a large former aerodrome site within its boundary. BAE Systems manufactured aeroplanes at Woodford Aerodrome, until the site closed in 2011.
- 1.3 The village of Woodford, including the former Woodford aerodrome site, currently lies almost entirely within designated Greater Manchester Green Belt.
- 1.4 Planning policies in the NPPF, the Stockport Development Plan and the recently included Woodford Neighbourhood Plan have largely succeeded in allowing appropriate development in Woodford, while maintaining the rural character of the village.
- 1.5 With closure of BAE systems imminent, early consultation events and workshops with residents, organised by BAE systems, were welcomed and constructive. Residents recognised the need to reuse the aerodrome site and supported development of 450 dwellings with suitable infrastructure.
- 1.6 The aerodrome site was purchased by a housing developer in 2013. The developer and the council proposed a development of almost 1,000 new homes plus commercial uses on the site, spreading beyond the footprint of the existing aerodrome buildings on the site.
- 1.7 Concerned about the very large number of dwellings proposed, residents lobbied their MP, local councillors and Ministers.



The Parliamentary Under Secretary of State for Communities and Local Government, the Rt Hon Don Foster MP, meets Woodford residents with Mark Hunter MP in 2013



The Housing Minister, the Rt Hon Nick Boles MP, meets Woodford residents with Mary Robinson MP and councillor Alanna Vine in 2014

- 1.8 A hybrid planning application for 920 dwellings, plus care facility and commercial premises on the aerodrome site was granted planning permission in 2015. The development is a very different scale and style compared with the original village and is less open than the former aerodrome.
- 1.9 The section 106 agreements accompanying planning permissions included, but were not limited to: 15.5% affordable housing on site, a contribution to affordable housing in the borough, a school to be built on site upon the occupation of 450 houses, contributions towards an additional bus services, funds for to facilitate cycling, improved public rights of way, travel plan and co-ordinator to reduce car trips, a contribution to highways works, mitigation and traffic calming measures, improvements to country footpaths. Many of the contributions outlined above were phased. Some have been implemented and others are now due.
- 1.10 The developer initiated liaison meetings with representatives of local community organisations. The community is unable to have any influence over the size, style or design of the development. Demolition and remediation resulted in considerable disturbance to existing residents, but the liaison meetings and the local councillors have provided a welcome forum

and conduit for expression of community views and any issues arising as a result of site remediation, construction, and deviations from the planning permission. Where compatible with progress, the developer has addressed problems that have arisen for the original community. One of the challenges of concern to the original community is successful integration of the new and old communities.

1.11 The developer has funded and facilitated improvements in the surrounding communities, two of which were in the old village of Woodford.

Woodford Neighbourhood Forum and the Woodford Neighbourhood Plan

1.12 When the Parliamentary Under Secretary of State for Communities and Local Government, the Rt Hon Don Foster MP visited Woodford in 2013, he suggested that the residents could prepare a neighbourhood plan, in order to have a say in the proposed aerodrome site development. His suggestion was followed up and Woodford Neighbourhood Forum was formed.

1.13 Woodford Neighbourhood Forum was designated by Stockport Council in 2013, but the aerodrome site was excluded at the request of the developer who had purchased the aerodrome site.

1.14 The Woodford Neighbourhood Plan is a criteria-based plan, which seeks to provide local detail to support borough and national policies used in making local planning decisions. It does not make specific land allocations.

1.15 The referendum on the Woodford Neighbourhood Plan produced a 38% turnout and 96% yes vote. This was a better than average turn-out and percent yes vote. According to MHCLG data in 2019, among 750 neighbourhood plan referendums, the average turn-out was 32% and the average yes vote was 89%.



Members of Woodford Neighbourhood Forum celebrating the referendum result in 2019

1.16 Following the successful referendum result, the Woodford Neighbourhood Plan became part of Stockport Borough Development Plan in September 2019.

2. Advantages of local consultation and engagement in planning

- 2.1 We place a high value on democracy in the planning system. We believe that public engagement, consultation and input play a vital role in good place making, which is the primary purpose of planning. We would object to any reduction in the public's opportunities to have a voice. In our experience, democracy operates at the level of elected representatives in the form of local councillors who have a say and represent our views as new Local Plans and planning proposals (large and small) pass through the various tiers of council meetings (such as area committee, highways committee, cabinet and full council meetings). We have a say in Local Plans, Joint Local Plans and big road schemes directly through the consultation process and indirectly via our local councillors.
- 2.2 We have provided examples below that we believe represent successes in achieving a better end product through public engagement in the planning system.
- 2.3 The first draft of the Greater Manchester Spatial Framework (GMSF), presented by the Combined Greater Manchester Authority (GMCA) in 2016, resulted in a public outcry at the proposed use of substantial Green Belt areas as allocations for development. Residents' groups assembled in communities all around Greater Manchester, to exert pressure to remove the Green Belt sites from the development plan. An umbrella organisation, Save Manchester's Green Belt, includes 50 such community groups, including Woodford. Residents engaged vigorously and passionately in the consultation process, with the result that the quantity of Green Belt proposed to be allocated for development was much less in the second iteration of GMSF presented in 2019. The allocation for Woodford was reduced from 2,400 dwellings on farmland in the heart of the village to 750 dwellings on the aerodrome site (in addition to the 920+ which already have planning permission). Residents' groups believe that development in Greater Manchester can be achieved without any Green Belt loss and have continued to campaign. At the time of writing, the 10 local authorities that comprise GMCA are about to vote on the third iteration of GMSF which, if approved by all 10 authorities, will be published for consultation and proceed to the Plan Examination stage. We regard this as an example of democracy and effective expression of public opinion in the current planning process, which residents feel is very important.



Local councillors John McGahan, Alanna Vine and Brian Bagnall with Mary Robinson MP supporting residents in a Save the Green Belt march in Stockport in 2017

2.4 Consultation and engagement with members of the community was paramount in the preparation of the Woodford Neighbourhood Plan and their views are represented in the vision, objectives, policies and aspirations. The referendum result is a testament to the level of engagement with and support for the neighbourhood plan among the residents.



Public Exhibition of Woodford Neighbourhood Plan: Vision and Objectives
Woodford Community Centre in 2015

2.5 The forum management committee has developed a good working relationship with Stockport Borough Council planning officers and also enjoys a high level of support from local councillors and local MP, Mary Robinson. We believe this aids the planning process.

2.6 The forum is a consultee on all planning applications within the designated Neighbourhood Area, which provides an opportunity for the forum to assess planning applications against the criteria in the neighbourhood plan and to express residents' views. We regard this as a valuable input into the planning system for a successful outcome that works for residents.

2.7 We have monitored implementation of the WNP during its first year as part of the borough Development Plan. We found that, although many applicants do not reference it in their planning applications, the council officers diligently assess all relevant applications against the criteria in the WNP, with the result that the vision and objectives are being met so far. We regard the interaction with the council and the implementation of the neighbourhood plan as a successful product of localism and community engagement in the planning system.

3. WNF general comments on the proposed planning reforms

3.1 We believe that the purpose of the planning system is to create and maintain good quality place making and place keeping for all people to live, work and play.

3.2 The emphasis in the proposed planning reforms needs to be broadened to include environmental, health, social justice and community issues, as well as economic and housing considerations.

3.3 We place a high value on democracy and public involvement in the planning system and would not want to see any reduction in the public's opportunities to have a voice. We would welcome any measures that encourage public participation in the early stage of Local Plan preparation, but would object to removal of consultation stages throughout the process. Local people and their elected representatives should continue to have a say in planning applications and the making of plans for their local areas.

3.4 We believe that the majority of planning decisions cannot be made at a national level. Much of planning concerns important local detail regarding topography, population density, natural resources, employment opportunities, environmental considerations, heritage assets and local character. We believe that input from local communities is vital for successful planning and decisions cannot be made at a national level.

3.5 We support localism and the neighbourhood planning process, which is a useful vehicle for providing local communities with a voice in planning.

3.6 We are concerned that the role of neighbourhood planning is being reduced in the White Paper to an input on design through these proposals.

3.7 While we agree that the current planning system is complex and overloads the resources available to it, we believe that many of the proposals presented would destroy the purpose of planning. In addition, reductions in workload achieved by some of the proposals would be offset by increases in workload resulting from other proposals.

3.8 We do not believe that planning is the problem in delivering the homes that are needed.

The following issues need to be rectified:

- Use of land with planning permission as an investment strategy. There is planning permission for over 1 million homes that have not yet been built.
- Development has been too focussed on expensive and larger homes, which provide more profit for developers.
- Increasing supply will have a minimal effect on price.
- There needs to be a greater emphasis on mechanisms to support low cost market housing and social housing.

3.9 Division of the land into the proposed three categories will be fraught with difficulties, including:

- Land use is typically very heterogeneous, even down to a small scale.
- Land value will be affected according to the category assigned.
- People's lives and fortunes would be significantly impacted.
- Decision making would be very onerous, time consuming and controversial.

3.10 Where is the evidence that the target should be 300, 000 new homes per year? This is not consistent with the following data:

- The ONS figure for new household formation in 2016 was 165, 000 per year.
- Housing stock has grown by 168,000 per year.
- Growth in households has increased at an average of 147,000 per year.
- There are 1.1 million more homes than households.
- Since 2009, 2.5 million homes have been granted planning permission, but only 1.5 million have been built.
- Paragraph 1.5 in the Introduction to the PWP states "construction rates *[are]* at a 30-year high in 2019". This is not consistent with the argument that planning is causing a problem in construction.

3.11 The notion that increasing supply will reduce prices is flawed.

- Many complex factors influence house prices, including interest rates and ability to save adequate funds.
- An increase in stock of 300,000 is only likely to reduce the annual increase in house prices by a few percent.

3.12 We object to proposals to impose mandatory housing targets.

- National targets will not be appropriate for all localities.
- How will land and site constraints be taken into account?
- How will it support deprived areas?

3.13 Many of the proposals are not supported by sufficient detail or evidence for us to assess the impact. For example:

Paragraph 1.2 of the planning white paper suggests that “the masterplans and design codes for sites prepared for substantial development should seek to include a variety of development types from different builders which allow more phases to come forward together”. It is not clear how this could be achieved, so we are unable to comment.

- 3.14 Too much emphasis is given to the speed of development at the expense of a good outcome for the benefit of existing and new communities.
- 3.15 Beauty is a subjective concept and an inappropriate word in the context of planning. Our priority should be to create pleasant, safe, and well-designed places for people to live, work and play, with access to the necessary infrastructure, while minimising negative impacts on the environment and our own niche on the planet.
- 3.16 The Paper is silent on upgrading our existing housing stock to adapt to climate change, which we feel is very important and should be addressed.
- 3.17 Improvements in insulation of existing housing stock may not necessarily be compatible with the aspirations for beauty, unless sensitively handled.
- 3.18 The White Paper does not give sufficient emphasis to the urgent need to encourage wildlife recovery. The extent of the current ecological collapse, which has serious consequences for our own future, is beginning to percolate through from scientists to the forefront of general public awareness. Wildlife protection and recovery is an important issue that should be addressed in the planning system.
- 3.19 Exposure to nature has well documented benefits for mental and physical health. This was highlighted during Covid restriction measures, which saw large numbers of local people seeking mental and physical restitution outdoors along Woodford’s lanes and country footpaths. Many people choose places close to nature when they have access to them. Easy access to nature should be a key part of planning reform.
- 3.20 We support the Cheshire Wildlife Trust’s call for strategic planning for nature, in which the network of space needed for nature’s recovery is identified, mapped, integrated into the planning system and applied across all zones. This Nature Recovery Network map should be upheld by law and inform Local Plans.

4. WNF Response to questions in the consultation

4.1 Pillar One – Planning for development

Questions

1. What three words do you associate most with the planning system in England?
 1. Biased towards development.
 2. Importance of Green Belt and green space.
 3. Importance of local consultation and the democratic process.

2. Do you get involved with planning decisions in your local area?

[Yes / No]

Yes

2(a). If no, why not?

[Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

- Not applicable

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

[Social media / Online news / Newspaper / By post / Other – please specify]

- Via council website.
- Every LPA has a different Planning section of its website and these vary substantially in terms of their content, accuracy and being up to date. We would support a more standard approach to LPA websites based on set criteria from Government which provided all parties with all the relevant data for each application including appeals made against decisions on applications.
- Access to digital information should be available in local libraries for those without internet at home.

4. What are your top three priorities for planning in your local area?

[Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

1. The environment, biodiversity and action on climate change.
2. Protection of green spaces.
3. Increasing the suitability and affordability of housing for different sections of the population.

Proposal 1: The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – Growth areas suitable for substantial development, renewal areas suitable for development, and areas that are Protected.

Question

5. Do you agree that Local Plans should be simplified in line with our proposals?
[Yes / No / Not sure. Please provide supporting statement.]

No.

- We support simplification of Local Plans and the process required to prepare them.
- However, we object to proposals for zoning for the following reasons:
 - Most areas are a heterogeneous mixture of different types of land use.
 - Decisions over categorisation would be difficult, controversial and very time consuming.
 - There would be a likely impact on land/site value according to zone category.
 - Decisions would require very detailed local knowledge and could not be made at a national level.
 - We do not support automatic permission in principle because it is not democratic and also deprives communities of input into important local detail.
- We support any further protection afforded to Green Belt, AONBs, SSSIs, LWSs, Conservation Areas, heritage assets, areas of significant flood risk and important green spaces.
- More consideration needs to be given to the importance of environmental, health and social factors as we come out of the Corona virus pandemic.

Proposal 2: Development management policies established at national scale and an altered role for Local Plans.

Question

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?
[Yes / No / Not sure. Please provide supporting statement.]

No.

- This cannot be achieved nationally. How can nationally-based civil servants in London understand what is needed or possible in Stockport or Bolton or Manchester?
- Area specific development policies are important, as well as local criteria and policies that should reflect local circumstances and preferences. Policies specific to Woodford, such as those in the Neighbourhood Plan, would have helped to shape appropriate development on the former aerodrome site in Woodford. See paragraphs 1.6 to 1.8 and 1.12 to 1.16 in the Background section of this document.

Proposal 3: Local Plans should be subject to a single statutory “sustainable development” test, replacing the existing tests of soundness.

Questions

7(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?

[Yes / No / Not sure. Please provide supporting statement.]

No.

- A test of a Local Plan needs to include social and environmental, as well as economic and housing aspects.
- A single statutory sustainable development test approved by a Secretary of State would need to be very comprehensive and ensure that climate change and biodiversity are adequately addressed. He/she would also need to be very well advised by health, climate and environmental experts, rather than solely by development experts.
- More information is needed on the alternatives.
- This is another example of seeking to simplify for its own sake when place making is a complex task, which needs to reflect local factors and characteristics.

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

- RTPi published a report on Strategic Planning (SP) in 2015 entitled Strategic Planning for planning across boundaries: Effective co-operation for planning across boundaries. The paper focused on strengthening strategic planning to see how planning could respond to the challenges of marrying local concerns and wider issues across city-regions and other areas. It outlined some of the general principles all strategic planning should follow. The report can be found here:

<https://www.rtpi.org.uk/media/1521/strategic-planning-effective-cooperation-across-boundaries-2015.pdf>

- A number of general principles were set out, obtained through the work for the report and the experience of RTPi members. A series of general principles were set out which strategic planning should follow irrespective of where it is practised. These strategic planning principles were as follows:
 - Strategic planning should have focus - being efficient in the use of resources and clear about its purpose;
 - SP should be genuinely strategic – dealing only with matters which require resolution across boundaries;
 - SP should be spatial – i.e. it should make choices between places, not simply establish general criteria for later decision making;
 - SP should be collaborative - meaning that partners work together to see how they can deliver each other’s remit;
 - SP should have strong leadership – so that negotiations between places are productive and not protracted;
 - SP should be accountable to local electorates.

- In recent years since this report was published, SP has been slow to develop for a number of political, economic and other factors. Current challenges for all levels of planning include climate change, biodiversity, health and well-being, housing and economic development, the latter two being given priority at the expense of the other challenges. Furthermore, administrative and political boundaries, sometimes set generations previously, are not always the most appropriate to tackle some of the challenges listed above. For example, water catchment areas and natural boundaries are more critical than in previous generations.
- We supported the Duty to co-operate (DTC) as our community immediately adjoins the boundaries of Greater Manchester (Stockport Council area) and Cheshire (Cheshire East Council). Indeed Woodford lay within Cheshire until 1974. Our recent experience of Local Plans in both authorities was that the DTC is good practice, but this only happened at a theoretical level. It was often used as the basis for housing need assessments with little attention being paid to other issues. DTC was not effective in our experience of cross-boundary issues and we could provide examples if required.
- We would suggest from our experience that the reason DTC and strategic planning are not working as effective tools of spatial planning is that the main emphasis has only been on meeting housing numbers. Place making and place keeping in all their aspects require the highest priority for both DTC and strategic planning.

Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.

Questions

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

[Yes / No / Not sure. Please provide supporting statement.]

No.

- It cannot be achieved with a national formula.
- One size does not fit all because there are large variations in housing needs, land value, infrastructure and constraints around the country.
- Regional variations have been further highlighted by the Covid pandemic.
- The method needs to address local housing needs and be decided locally.

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

[Yes / No / Not sure. Please provide supporting statement.]

No.

- We assume affordability refers to the ability of residents to purchase a home.
- Affordability is influenced by many complex factors. This is not a valid assessment of need.

- This proposal will lead to more housing in affluent areas where housing is more expensive and less housing in deprived areas where housing is cheaper. This will not support the goal of "levelling up", but could achieve the opposite.

Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.

Questions

9(a). Do you agree that there should be automatic outline permission for areas for substantial development (*Growth areas*) with faster routes for detailed consent?
[Yes / No / Not sure. Please provide supporting statement.]

No.

- We do not support automatic outline planning permission for growth areas outlined in Proposal 5.
- Without the opportunity for local input into the decision making process it will not achieve local engagement, support or quality of place making.
- Designation of areas is likely to be fraught with difficulties and controversies, which are likely to take a very long time to resolve.

9(b). Do you agree with our proposals above for the consent arrangements for *Renewal and Protected areas*?
[Yes / No / Not sure. Please provide supporting statement.]

No.

- We do not support Proposal 5, which would mean that legislation confers a general presumption in favour of development in Renewal Areas.
- We do not support automatic consent for schemes that meet design and fast track to beauty requirements in Pillar Two, because without local input it will not achieve local engagement, support or quality of place making.
- We support the proposal to deal with Protected Areas via normal planning applications.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?
[Yes / No / Not sure. Please provide supporting statement.]

No.

- England is a very varied country with diverse needs and a nationally based zonal system will not serve good outcomes. It is imperative to maintain local involvement which would be lost in faster planning systems. It reduces democracy, by removing community consultation and input.

- We can provide as an example the Handforth Garden Village, which was named as one of the Government's "Flag ship garden villages" while the Examination of the Cheshire East Local Plan Strategy was in progress. The land was taken out of Green Belt in the Local Plan and a development of 1650 dwellings plus commercial premises has been granted planning permission in spite of significant opposition from developers, the immediately adjacent Stockport local authority, Handforth residents, the Cheshire Wildlife Trust, and Woodford Neighbourhood Forum. The site is immediately adjacent to Green Belt in Woodford. The Green Belt in Handforth helped to provide a gap to prevent settlements merging in accord with Green Belt national principles. The development presents significant transport and education infrastructure problems for the neighbouring borough of Stockport, impacts a Local Wildlife Site, removes a large area of trees, ponds and farmland from the ecosystem and removes access to green space for the public.
- Therefore, we do not support national decisions for new settlements. When local needs are addressed they could be sited more suitably and successfully on the basis of knowledge and understanding of local factors.

Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology

Question

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

[Yes / No / Not sure. Please provide supporting statement.]

No.

- Sole use of digital technology would be undemocratic because not everybody has access to the internet.
- We would agree in principle with the use of technology, but support and help packages would need introducing.
- The community and elected representatives should continue to have a say in the process. The proposals in the White Paper appear to remove this.
- The standard planning application form should have a section to set out the relevant policies in the NPPF, Borough Planning Policies, and any Neighbourhood Plan. In this way applicants and their agents would be expected to be aware of and take account of all levels of Planning policy concerning their applications.

Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.

Question

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

[Yes / No / Not sure. Please provide supporting statement.]

Not sure.

- It is a good idea to have a standard map in the same uniform format across the

board. This would improve accessibility and readability, but more information is required.

- A standard map format would also benefit all parties in the Planning process including the speeding up of background research into proposed development sites.
- People will need to be informed and know where to look on the web to find the information.

Proposal 8: Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and we will consider what sanctions there would be for those who fail to do so.

Question

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

[Yes / No / Not sure. Please provide supporting statement.]

No.

- 30 months appears to be arbitrary.
- Where is the evidence and rationale that 30 months is achievable?
- The current system is definitely over-complicated
- One set figure cannot possibly fit all Local Authorities ability to produce a LP. Norfolk as a rural county is completely different to Stockport for instance.
- Categorisation of land into the proposed areas would take significant effort and time.
- Local Authorities are obliged under current legislation to set out a timescale for the preparation of a Local Plan in their Local Development Scheme. Most authorities have failed to meet their timescales due to lack of resources.
- More details and information are required.
- We disagree with removal of right to be heard outlined in paragraph 2.53 of the PWP.
- We disagree with the option of self-assessment by the Local Authority outlined in paragraph 2.54 of the PWP.

Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools

Questions

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

- Neighbourhood plans are a useful way for communities to have a voice in planning. The process is currently long and arduous. See paragraphs 1.12 to 1.16 and 2.4 to 2.7 in the Background section of this document.
- Development policies in a neighbourhood plan can add specific local detail to support policies in the NPPF and the local authority development plan.

- We would not support the remit of neighbourhood planning being reduced to involvement in design codes
- The process of preparation of a neighbourhood plan is currently onerous for lay people. It needs to be simplified. For example, Regulation 16 consultation is superfluous. A simpler sustainability appraisal would suffice for plans that do not allocate development sites.

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

- Neighbourhood Forums and Local Authorities could work together in preparing design codes.
- Consultation with communities in the preparation of neighbourhood plans could be very helpful in the development of design codes that reflect local character.
- Training would be needed in the use of digital tools. The results would need to be accessible by ordinary residents during the consultation process.

Proposal 10: A stronger emphasis on build out through planning

Question

14. Do you agree there should be a stronger emphasis on the build out of developments?

And if so, what further measures would you support?

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

- Developments should be built out more quickly once planning permission is granted.
- We support faster build-out through diversification in the house building market through more providers e.g. SMEs, direct delivery by local authorities, housing associations and other promoters of new housing.
- As an additional suggestion, more off-site building (pre-fabricated structures) could provide advantages for speed of build out, particularly in growth areas. In addition, it would be preferable for local communities in terms of much less heavy traffic delivering building materials.
- Off-site manufactured homes may release skilled site labour, which is in short supply.
- We appreciate that it would not be suitable for all locations, for example where there are access constraints.
- There are two examples in Woodford of houses with a high level of sustainability that were built using pre-fabricated structures. In one example the superstructure, ground floor slab to ridge, went up in three weeks.

4.2 Pillar Two – Planning for beautiful and sustainable places

Questions

15. What do you think about the design of new development that has happened recently in your area?

[Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]

- Woodford was already a mixture of styles and designs prior to the recent development.
- Some new development is acceptable and some is poor.
- We believe that the council has done a good job in keeping the character of the village by following the criteria in the NPPF, borough policies and neighbourhood plan policies.
- We have extensions and new barn conversions which have worked well.
- There are exceptions, for example some infill is too large, or too cramped in the space. We also have an example where a planning inspector misinterpreted our infill policy at an appeal and allowed inappropriate development on one site.
- A large development on a former aerodrome site has tripled the size of the village and the style is now completely different in character to the rest of the village. See paragraphs 1.6 to 1.11 in the background section of this document.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

In priority order:

1. Less reliance on cars.
2. Lower speed limits.
3. Energy efficiency of new buildings.
4. More use of green energy.
5. Improved public transport.
6. More trees.
7. Measures to encourage walking and cycling.
8. Retention of open green spaces.
9. Better access into the countryside.
10. More small public green spaces in the borough.

Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.

Question

17. Do you agree with our proposals for improving the production and use of design guides and codes?

[Yes / No / Not sure. Please provide supporting statement.]

Not sure.

- We support local, but not national production and use of design guides and codes, but more details and information is required about such proposals

Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.

Question

18. 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?

[Yes / No / Not sure. Please provide supporting statement.]

No.

- A new body is not needed.

Yes

- We support the proposal for each Local Authority to have its own lead design and place making officer.

Proposal 13: To further embed national leadership on delivering better places, we will consider how Homes England's strategic objectives can give greater emphasis to delivering beautiful places.

Question

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.

Question

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

[Yes / No / Not sure. Please provide supporting statement.]

No.

- Beauty is a subjective concept. Good design is important, but only one of the issues to be considered in planning.
- There should not be a fast track which bypasses other important considerations e.g. sustainability, safety, constraints, and infrastructure.

Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.

We support measures aimed at mitigating and adapting to climate change and maximising environmental benefits. These will be key considerations.

Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.

Assessment of environmental impacts is very important and needs to be thorough. It should not be compromised in the interests of speed.

Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century

We support measures to conserve and enhance our historic buildings and areas.

Proposal 18: To complement our planning reforms, we will facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.

We support the aims for improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050, greater accountability and better enforcement.

4.3 Pillar Three –Planning for infrastructure and connected places

Question

21. When new development happens in your area, what is your priority for what comes with it?

[More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other – please specify]

- We have experience with a large new development in Green Belt in Woodford, which will triple the size of the original community when built out. See paragraphs 1.2 to 1.11 in the Background section of this document.
- Residents' priorities when consulted about the development included:
 - Adequate infrastructure to support it: employment, transport schools, shops, health provision, community facilities.
 - Mitigation measures to deal with the expected large increase in local traffic.
 - Retention of as many native trees as possible for environmental and aesthetic reasons.
 - Mitigation measures for loss of green space and trees. In the event, many mature trees were cut down in contravention of the plan drawings and replaced with small saplings.
 - Measures to promote integration of existing and new communities.

Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.

Questions

22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

[Yes / No / Not sure. Please provide supporting statement.]

Not sure

- The White Paper suggests that the new proposed levy would be available for wider purposes than CIL but it is not clear what infrastructure items would the levy cover and would it allow for credit against all on-site infrastructure provided, as is being suggested in respect of affordable housing. For instance, a developer would want to know whether they were able to offset the value of a primary school that it provides on-site, but which will also serve children who do not live on the development. In these types of situations, it may be difficult to value how much of an offset is fair and proportionate. Furthermore, it is not clear if the levy is going to be any improvement on CIL.
- The new levy would be payable on occupation rather than on commencement which should enable developers with their cash flow issues and bring their developments out

of the ground. Levy rates are also proposed to be fixed at the grant of planning permission which should give developers a level of certainty of the costs they are facing.

- However, we do have concerns that LPAs would be faced with a difficult challenge. This would be whether to commit to the expenditure on local infrastructure in advance of receipt of the levy intended to pay for it and also whether developers may seek to deliver more infrastructure themselves "in kind". This would be to achieve both a levy offset and to ensure timely delivery if it is not certain when LPAs would deliver the necessary infrastructure via the levy.
- We have no first-hand direct experience of CIL in Stockport, because the Local Plan is not up to date and the new plan is under preparation. An up to date local plan is needed before CIL can be applied as charges are variable.
- Section 106 agreements provide some flexibility.
- We have experience with section 106 agreements associated with the development on the former Woodford aerodrome site. See paragraph 1.9 in the Background section in this document. These provide some benefits to the borough as a whole, for example funds for affordable housing, and meet some of the infrastructure requirements, such as education and commercial premises. However, phasing of development has resulted in long timescales before delivery of some of these measures. There is also very little that is of direct benefit to the original Woodford community, other than mitigation for the increased traffic arising from the development. Some measures, such as cycle lanes and cycle storage facilities at a neighbouring railway station have not yet materialised, nor has reinstatement of public rights of way that were closed when the aerodrome was constructed.

22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

[Nationally at a single rate / Nationally at an area-specific rate / Locally]

Locally.

- Any Infrastructure Levy should be set locally and not nationally.
- Land and other costs vary substantially across the country so levy rates should be reflected in some manner with the costs of local services and facilities.

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?

[Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

More.

- There is not enough provision for this at the moment.
- There are currently major discrepancies across England as to the quality, siting and quantity of local infrastructure to serve local communities.
The impact of the Covid virus will also need to be an important consideration as we recover from the pandemic over the next few years.

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

[Yes / No / Not sure. Please provide supporting statement.]

Not sure.

- This would potentially enable certain infrastructures to be built first.
- This is not a new proposal and is a version of tax increment financing.
- The process would still give rise to some financial risk and forecasting considerations.
- Also, it would not necessarily guarantee delivery of infrastructure mitigation any more than the current CIL system does.
- It is not made clear whether the new levy would come with the same discounts and exemptions that have been used under CIL.
- It is also not made clear whether it could be paid in instalments.
- This option could presumably be linked to first occupation of development phases, rather than their commencement.
- Any new levy needs to have high quality drafting and legislation and a less-complex procedure than its predecessor of CIL in order to be effective and timely.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture Changes of use through permitted development rights?

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

- Current CIL and S106 are only for developments that require a planning application followed by a grant of permission.
- With the increase in the range of permitted development opportunities for the development industry, it does not seem equitable for permitted development schemes to be excluded from the new Levy as this approach could lead to a differential regime and may also incentivise poor quality development.

Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights

Questions

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

- Local planning authorities can take the lead, as some have their own housing companies, whilst other authorities often have partnership arrangements with housing trusts and associations.
- England requires a wide range of new all types of housing, including different forms of affordable housing to meet the current housing crisis and the recovery from the Covid virus.

- A good local example is the use of the Mayoral Development Corporation funds to regenerate Stockport town centre.

24(b).

Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

- This is effectively what happens in practice with S106 for affordable housing being delivered onsite 'in-kind' rather than through a commuted sum. In this way, the local community can benefit from the additional level of local affordable housing.
- Furthermore, it is important that affordable housing should continue to be appraised in the Plan Viability assessment as being on-site.
- However, the LPA should also have the option to receive Infrastructure Levy in lieu in appropriate cases, such as very small sites or a mismatch between demand and supply for the affordable homes.

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

[Yes / No / Not sure. Please provide supporting statement.]

No.

- In our view this proposal is an over-complication.
- Currently, the on-site S106 affordable housing is specified and delivered for an agreed transfer price to a Registered Housing Provider or local Planning authority. This is for value with no over or under payment being involved or required.
- The only change required would be the name of the process, which could be renamed 'Infrastructure Levy- affordable housing' rather than 'S106-affordable housing'.

24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

[Yes / No / Not sure. Please provide supporting statement.]

Not sure.

- We suggest a separate levy for affordable housing.
- Affordable housing should be of the same quality as the rest of the build.
- The Infrastructure Levy affordable housing component would need to be specified and delivered for the agreed transfer price, as currently takes place for S106 affordable housing.

Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy

Question

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

[Yes / No / Not sure. Please provide supporting statement.]

Not sure.

- This question proposes that Government may increase local authority flexibility to allow them to spend Infrastructure Levy receipts on their policy priorities, once the core infrastructure obligations have been met.
- The suggestion is made that, in addition to the provision of local infrastructure including parks, open spaces, street trees and delivery or enhancement of community facilities, this may include improving other facilities and services which are in need of renewal or refurbishment.
- If there is a surplus of funding once infrastructure and affordable housing commitments are met, the LPA could utilise any surplus funds to improve these other needy community facilities.
- Local authorities will need more resources to implement this.
- As happens in some cases with CIL, the Local Authority could consult the community on a list of improvement requirements. This method would encourage community involvement.

25(a). If yes, should an affordable housing 'ring-fence' be developed?

[Yes / No / Not sure. Please provide supporting statement.]

Yes.

- The Infrastructure Levy should be ring fenced for affordable housing and infrastructure to mitigate the harm and externalities caused by the built development.
- Alongside the Local Plan, LPAs should develop a list of other local improvements (economic, social and environmental) as the three pillars of sustainability to benefit the local communities impacted by the development.

4.4 Delivery

Proposal 23: As we develop our final proposals for this new planning system, we will develop a comprehensive resources and skills strategy for the planning sector to support the implementation of our reforms. In doing so, we propose this strategy will be developed including the following key elements:

- Paragraph 5.17: We support funding of the planning system by the beneficiaries of planning gain – landowners and developers – rather than the national or local taxpayer.

- Paragraph 5.18: We believe that rather than planning fees being set at a national basis, application fees should match the scale of the plan and the value added. The value added will vary around the country depending on land values.
- We suggest that the costs of planning appeals should be met by the developer rather than the taxpayer via the council tax. We believe that fear of losing at appeal can influence the decision made by a council.
- More information is needed in order to assess the other proposals.

Proposal 24: We will seek to strengthen enforcement powers and sanctions

- We support both aspects of these proposals, namely the strengthening of the powers of enforcement and providing incentives for enforcement action to be taken by local planning authorities.

4.5 What happens next

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

No.

No views on this. Legislation with regard to protected characteristics remains applicable.