

# Brockenhurst Parish Council

## Response to MHCLG Consultation – Planning for the Future

Ref.	Questions	Parish Council Response
<b>Pillar One – Planning for development</b>		
1.	What three words do you associate most with the planning system in England?	Complex Imperfect Expensive
2(a).	Do you get involved with planning decisions in your local area?	Yes – Brockenhurst Parish Council is consulted by the New Forest National Park Authority (NFNPA) on plans in our Parish.
2(b).	If no, why not?	N/A
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?	By any medium available – NFNPA currently advises us of applications by email and we can easily access them via their website.
4.	What are your top three priorities for planning in your local area?	<ol style="list-style-type: none"> <li>1. To achieve developments and designs in-keeping with the New Forest environment</li> <li>2. Ensuring new development addresses local needs</li> <li>3. Providing affordable housing</li> </ol>
5.	Do you agree that Local Plans should be simplified in line with our proposals?	No – Every area of the country is unique and has different needs. One size does not fit all. We are concerned that the proposed method will not take due account of local views / knowledge.
6.	Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?	No – The proposals go too far in taking out the development management policies for the New Forest National Park. As a village in the National Park we do not wish to have central government controls imposed upon us which do not take sufficient account of local needs. The present system has its faults but local democracy should be allowed to prevail so that we can continue to engage in meaningful debate with our local planning authority.
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	No – Legal and policy tests are important and should still be applied. Sustainability of proposed

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	would include consideration of environmental impact?	developments is already considered as part of our deliberations.
7(b).	How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?	The removal of the duty to cooperate is a retrograde step. We believe it should remain.
8(a).	Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?	No – A national method would not work for us. As a village in a National Park, our requirements are unique and cannot be determined nationally. At present the homes built in this country (not just those designated as ‘affordable’) are generally the most cramped in Europe with tiny rooms, no storage space and very little outdoor space. And we expect people to thrive. Place design can overcome the lack of private outdoor space by having communal outdoor space, but it is not clear that these proposals will help deal with these problems.
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?	No – Affordability is not an appropriate indicator of quantity of development.
9(a).	Do you agree that there should be automatic outline permission for areas with substantial development ( <i>Growth areas</i> ) with faster routes for detailed consent?	No – Each case needs to be examined in detail on its own merits.
9(b).	Do you agree with our proposals above for the consent arrangements for <i>Renewal</i> and <i>Protected</i> areas?	No – With only three designated categories there is not enough diversity for the special circumstances found within the New Forest National Park.
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
10.	Do you agree with our proposals to make decision-making faster and more certain?	No – It seems that these proposals are far more weighted towards the interests of developers and landowners than local people. We are concerned that Parish Council input to planning applications will not be required or will

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		be overlooked. This is inappropriate for the New Forest National Park setting.
11.	Do you agree with our proposals for accessible, web-based Local Plans?	No – Plans must be accessible to all. Web-based plans are not useable in some parts of our Parish due to poor broadband. Local people without access to the internet still need to have a means of engaging with the planning process.
12.	Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?	Yes – If this can be achieved, however, it will present challenges for the NFNPA regarding meaningful public consultation.
13(a).	Do you agree that Neighbourhood Plans should be retained in the reformed planning system?	Yes – Neighbourhood Plans are very expensive and time-consuming to produce, involving extensive public consultation on the future of the towns / villages in question and we believe that their results should be taken into consideration. We are seeking to build strong local communities not simply accommodation and so it is essential that local views are taken into account.
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?	Community preferences regarding design can be reflected through consultation on the development of Local Plans.
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?	Not sure – This is not applicable to Brockenhurst at present.
<b>Pillar Two – Planning for beautiful and sustainable places</b>		
15.	What do you think about the design of new development that has happened recently in your area?	Most development has been sympathetic to the village.
16.	Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?	Quality of build, and striving for zero carbon homes with enough space and storage for people to thrive and lead satisfying lives should be central to any planning system. Achieving sustainable development requires a combination of all the factors listed. Within the New Forest National Park prevention of light pollution is also a key issue.

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17.	Do you agree with our proposals for improving the production and use of design guides and codes?	Yes – On the proviso that since every area is different the local vernacular needs to be recognised in building design.
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?	No – It would be better to make better use of existing bodies with each authority having an officer with expertise in place-making and design. We consider that it would be incredibly useful if Hampshire County Council had such an officer.
19.	Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?	Yes – We support the emphasis on greater design quality.
20.	Do you agree with our proposals for implementing a fast-track for beauty?	No – This will not work in the New Forest National park where local vernacular is important to preserving its character.
<b>Pillar Three – Planning for infrastructure and connected places</b>		
21.	When new development happens in your area, what is your priority for what comes with it?	More affordable housing.
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?	Not sure – This is dealt with by the NFNPA.
22(b).	Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate or set locally?	Locally
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?	The aim should be to capture as much levy as possible and at least the same amount overall – there is an acute need for more money for local communities.
22(d).	Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?	Not sure – Any changes of this nature will require cast-iron safeguards to be put in place to prevent investment in anything other than infrastructure (ie. not bonds, stock market, commercial property or similar investments).

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23.	Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?	Yes – Buildings do not remain static throughout their lifecycle and changes may have substantial impacts on local infrastructure.
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 – We should seek to secure as much affordable housing as possible to meet local need.
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?	Not sure
24(c).	If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?	Not sure
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?	Not sure
25.	Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?	Yes – It should be for local authorities to determine appropriate local uses for this funding.
25(a).	If yes, should an affordable housing ‘ring-fence’ be developed?	Any CIL money for affordable housing should be ring-fenced.
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?	Proposals must be made available through all communication methods so that no one is disadvantaged.