



# BUCKINGHAM TOWN COUNCIL

TOWN COUNCIL OFFICES, BUCKINGHAM CENTRE,  
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Town Clerk: Mr. P. Hodson

Wednesday, 07 October 2020

PLANNING  
COMMITTEE

Councillor,

You are summoned to a meeting of the Planning Committee of Buckingham Town Council to be held on **Monday 12<sup>th</sup> October 2020 at 7pm** online via Zoom, Meeting ID 871 2899 7691.

Residents are very welcome to ask questions or speak to Councillors at the start of the meeting in the usual way. Please email [committeeclerk@buckingham-tc.gov.uk](mailto:committeeclerk@buckingham-tc.gov.uk) or call 01280 816426 for the password to take part.

The meeting can be watched live on the Town Council's YouTube channel here:  
<https://www.youtube.com/channel/UC89BUTwVpjAOEldSIfcZC9Q/>

*Paul Hodson*

Mr. P. Hodson  
Town Clerk

Please note that the meeting will be preceded by a Public Session in accordance with Standing Order 3.f, which will last for a maximum of 15 minutes, and time for examination of the plans by Members.

## AGENDA

- 1. Apologies for Absence**  
Members are asked to receive apologies from Members.
- 2. Declarations of Interest**  
To receive declarations of any personal or prejudicial interest under consideration on this agenda in accordance with the Localism Act 2011 Sections 26-34 & Schedule 4.
- 3. Minutes**  
To receive the minutes of the Planning Committee Meeting held on Monday 14<sup>th</sup> September 2020 put before the Full Council meeting held on 5<sup>th</sup> October 2020.

**Copy previously circulated**

Buckingham



Twinned with Mouvaux, France;

Neukirchen Vluyn, Germany



*Members are reminded when making decisions that the Public Sector Equality Duty 2010 requires Members to have due regard to the need to: Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act, advance equality of opportunity between people who share a characteristic and those who don't, and to foster good relations between people who share a characteristic and those who don't.*

*All Committee documents can be found on the Buckingham Town Council's website. Alternatively, the Clerk send you a copy of any minutes, reports or other information. To do this, send a request using the contact details set out above.*

**4. Buckingham Neighbourhood Plan/Vale of Aylesbury Plan**

To receive a report from the Town Clerk on the meeting of the Neighbourhood Plan Group held on Tuesday 29<sup>th</sup> September 2020, and discuss and agree the Recommendations therein.

[Appendix A](#)

**5. Action Reports**

To receive action reports as per the attached list.

[Appendix B](#)

**6. Planning Applications**

For Member's information the next scheduled Buckinghamshire Council – North Buckinghamshire Planning Area Committee meetings are on Wednesday 28<sup>th</sup> October and 18<sup>th</sup> November at 2.30pm. Strategic Sites Committee meetings are the following day at 2pm.

Additional Notes from the Clerk

[Appendix C](#)

To consider a response to planning applications received from Buckinghamshire Council and whether to request a call-in

*The following two applications may be considered together*

1. [20/02991/APP](#) Moriah Cottage, Moreton Road MK18 1LA
2. [20/02992/ALB](#) Replacement gate  
*Wisbach*
  
3. [20/03066/APP](#) 2 Jacob, *[Moreton Road Phase I]*, MK18 1GE  
Single storey front extension  
*Malpass*
  
4. [20/03139/COUC](#) 6 Cornwalls Centre *[6 Cornwall Place]* MK18 1SB  
Determination under Class C of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 as to whether prior approval is required in respect of noise impacts, odour impacts, impacts of storage and handling of waste, impacts of hours of opening, transport and highways impacts, impact of the change of use, and the siting, design or external appearance of the facilities to be provided, for the change of use of the premises to licensed coffee shop  
*King*
  
5. [20/03256/APP](#) 29 Plover Close MK18 7ES  
Extending existing rear conservatory  
*Clarke*

**Not for consultation**

6. [20/03021/ATP](#) 1 Bostock Court, West Street MK18 1HH  
1 x Common Beech – reduce canopy over all to create minimum 3m clearance from building line and to balance opposite side;  
1 x Copper Beech – reduce overextended branches to improve form;  
4 x Lawson Cypress – fell to ground level  
1 x Willow – re-pollard  
*Hall*

*Members are advised that this application has been approved (1/10/20)*

7. [20/03306/ATC](#) Buckingham Primary School, Foscott Way MK18 1TT  
Works to trees:  
First tree T53 - Sycamore - Mature age class. High priority Tag 1880. Large dead limb over play area. Lower easterly limb is twin stemmed and naturally fused. This will also help manage the tree into decline by

presenting a smaller target to wind forces. This limb and crown apex previously reduced to a good standard but appears tree is still struggling to respond. Further deadwood through crown further indicates decline. Excellent habitat value due to numerous cavities. However, retention next to reception years play area is not recommended. Instead retention as a habitat feature felt more appropriate given setting Proposed works Reduce to leave as c. 4-5m pole. Reduce easterly limbs to 1-2m stubs.

2nd Tree T38- Common Ash - Early Mature Age class Stem leans to north west, over property, but this does not appear to be progressive or indicate instability.

Proposed Works Sever ivy at base and strip 1-2m section from stem. Prune to clear building by 2-3m.

Milne

*I have queried this with Buckinghamshire/Trees as the school is not in the Conservation Area; if these are TPO'd trees I would expect there to be some documentation on the website, and there isn't any (5/10/20), not even an application form.*

*This Notification was put before the Full Council on 5<sup>th</sup> October 2020 and is included for completeness of the record*

8. 20/03130/ATN Phone box outside M&Co, Market Hill MK18 1JX  
Notification of removal  
*British Telecommunications plc.*

## 7. Planning Decisions

7.1 To receive for information details of planning decisions made by Buckinghamshire Council.

### Approved

20/02690/APP 4 Foscott Way

Single storey rear extension

### BTC response

No objections

### Refused

20/02013/APP 10 Hilltop Ave.

Close Board fence (retrosp.)  
& garden shed

Oppose

### Withdrawn

20/01240/APP 5 The Villas

Single storey side extension

Oppose & Call-in

### Not Consulted on:

#### Approved

20/02356/ATP R/o 3 Carisbrooke Ct. Fell 1 chestnut (allegedly causing subsidence)

20/02562/ATP 17 Holloway Drive Partial crown reduction to oak

20/03021/ATP 1 Bostock Court Maintenance work to beech, copper beech and willow

## 7.2 Planning Inspectorate

20/00337/APP 33 Bourton Rd.

Retention and completion of boundary wall and inclusion of land within residential curtilage

BTC Opposed (24/2/20); Buckinghamshire Refused (8/6/20); appeal against refusal 20/7/20  
*Inspector has allowed the appeal.*

## 8. Buckinghamshire Council Members

8.1 To receive news of Buckinghamshire Council new documents and other information from Council Members present

8.2 To discuss applications to be called-in, as decided above, and which Buckinghamshire Councillor wishes to volunteer for this

8.3 An updated list of undecided **OPPOSE & ATTEND** applications and call-ins, is attached for information **Appendix D**

**9. Government Consultations**

9.1 To receive for information Buckinghamshire Council's response to Planning for the Future and covering letter. **Appendix E**

9.2 To receive the draft response to the White Paper summarised from Members' comments, discuss and agree it as the formal response of the Town Council **Appendix F**

9.3 To note that the response to the *Planning for the Future* consultation was submitted to NALC, and to DCLG, within the respective deadlines, and receipt acknowledged.

**10. Buckinghamshire Council Committee meetings**

10.1 N.Bucks Area Planning Committee (30<sup>th</sup> September 2020) *Cancelled*

10.2 Strategic Sites Committee (1<sup>st</sup> October 2020) *No Buckingham applications*

10.2.1 For (diary) information, Maids Moreton PC have indicated that 16/00151/AOP – Land at Walnut Drive – may be on the agenda for the Strategic Sites Committee meeting on 19<sup>th</sup> November 2020. It is unlikely that the published agenda will be available before the next meeting of this Committee (2<sup>nd</sup> November).

**11. Enforcement**

11.1 To note that the following reports have been passed to Buckinghamshire Council and case files opened as follows:

11.1.1 Encroachment on public land beside 16 Hilltop Avenue (20/00482/CONB)

11.1.2 Installation of a uPVC door on 1 Manor Street (Listed Building)  
(20/00124/CON3)

11.1.3 Building work without approval Bourton Mill (Listed Building) (20/00404/CONA)

11.2 To report any new breaches

**12. (298.3) Draft Milton Keynes Planning Obligations SPD (postponed from August)**

"Members noted the Draft Milton Keynes Planning Obligations Supplementary Planning Document. Cllr. Harvey proposed, seconded by Cllr Stuchbury that a copy of the protocol document between MKC and local parish councils be brought back to a future meeting of the Planning Committee for discussion." <https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/draft-planning-obligations-supplementary-planning-document-spd>

**13. Matters to report**

Members to report any damaged, superfluous and redundant signage in the town, access issues or any other urgent matter.

**14. Chairman's items for information**

**15. Date of the next meeting:**

Monday 2<sup>nd</sup> November 2020 following the Interim Council meeting.

To Planning Committee:

Cllr. M. Cole JP (Vice Chairman)

Cllr. G. Collins (Town Mayor)

Cllr. J. Harvey

Cllr. P. Hirons

Cllr. A. Mahi

Cllr. Mrs. L. O'Donoghue (Chairman)

Cllr. A. Ralph

Cllr. R. Stuchbury

Cllr. M. Try

[www.buckingham-tc.gov.uk](http://www.buckingham-tc.gov.uk)  
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Mrs. C. Cumming (co-opted member)



**Minutes of the Neighbourhood Plan Sub-Committee of Buckingham Town Council held on Tuesday 29<sup>th</sup> September 2020** online via Zoom

<b>Present:</b>	Cllr. M. Cole JP	
	Cllr. J. Harvey	
	Cllr. P. Hirons	
	Cllr. A. Mahi	
	Cllr. Mrs. L. O'Donoghue	(Chairman, Planning Committee)
	Cllr. M. Try	
	Cllr R. Newell	
	Cllr G. Collins	
	Cllr. C. Strain-Clark	
	Mr Roger Newall	(Buckingham Society)
	Ms Sheena McMurtrie	(Town Plan Officer)
	Mrs. K. McElligott	(Planning Officer)
	Mr P. Hodson	(Town Clerk)

**1. Introduction**

To receive a verbal update from the Town Clerk on the purpose of the group and this meeting.

The Town Clerk explained that the purpose of the Group was to discuss plans to refresh the Neighbourhood Development Plan and to make any relevant recommendations to the Planning Committee.

**2. Progress of VALP**

To receive a verbal update from the Town Plan Officer

The Town Plan Officer summarised the progress of VALP to date. It was unlikely that VALP would be made before the end of March 2021, and if further consultation was required the timeline may be significantly longer. The Inspector is currently engaged in other work, which may lead to further delays. It is possible that VALP may be superseded by work to develop the future single Buckinghamshire Plan. This is also however not clear.

**3. Current BNDP**

To receive a verbal update from the Town Plan Officer

Several members of the group reported that VALP is likely to be subject to a Judicial Review if it is taken through in the current form. Issues with neighbouring plans may also put it at risk of further delay. It is not clear whether VALP would be pursued if it's further delayed, or whether Buckinghamshire Council will then focus on the Buckinghamshire Plan.

Sheena updated that the affordable housing currently required by the NDP may be challenged by a developer given the age of the plan. However, the NDP was consistent with AVDC's plan at the time the NDP was made, so once AVDC change their policy, we can't change that as we can't diverge from the strategic policy. But until VALP is made the current NDP should stand. We would still need to justify the 35%. It was AGREED to recommend to prioritise creating an evidence base for the 35% now. It was AGREED to recommend not to pursue other parishes beyond writing to them to clarify the town's current intentions

#### **4. BNDP refresh/renewal**

The Group discussed and AGREED to recommend to progress the proposed timeline for the refresh for now, acknowledging that it may need to be frozen, or the new legislation may change the value of refreshing the Plan.

#### **5. Buckingham Survey in 2021**

It was AGREED to recommend to commission a professional organisation to carry out a survey as soon as possible. That would ensure that the questions were asked in the right terms for a usable response. There is an acceptance that in planning anything that is published is out of date, but plans have successfully used data that is 2 years old. The survey would provide other data that would help the Town Council in its future decision making.

Roger suggested to ask VAHT for current figures on demand, from Bucks Home Choice.

The Town Clerk agreed to find out whether any other councils have done anything similar.

#### **6. Buckingham Design Guide Working Group**

To consider a written proposal from the Town Plan Officer and Town Clerk to form a working group to revise the Buckingham Vision & Design Guide 2001; [attached]

There are now national design guides for 10 characteristics. It seems that providing a local guide is relevant to the location, it will be viable. The national one is necessarily very broad. Any local codes need to be based on local distinctiveness and either be within the neighbourhood plan, or covered by a policy in the plan and included as an additional planning document. The guide needs to be brief and to the point if it's to be used by developers. It would be possible to select parts of the national document that are relevant and highlight those. The current layouts, design materials and so on in the town centre would need to be clarified and continued. Additional items such as green efficiency and lifetime homes could also be included. Roger will email some examples that have been successful in the district. It was AGREED to recommend to hold a separate meeting in a few weeks to draft a



Buckingham guide. This will aim to develop the design guide allowed for in the current NDP.

### **7. Any other business**

Economic Regeneration needs to be considered in the revised plan.

Assuming that there will be less commuting and more home working. Also the public health context, to prepare for future lockdowns, outdoor as well as indoor living. Lifetime housing should also be considered.

The Council may want to lobby MPs that the proposed changes allowing shops and retail units to be changed to residential may be the death knell to town centres.

### **8. Time and Date of next meeting**

To be held as required



## Regular actions

Minute	Actions	Minute	News Releases	Date of appearance
300/20	5 via Parish Channel 2 trees via Comments (1 Tree decided before meeting)			

## Other actions

Subject	Minute	Form	Rating √ = done	Response received
<b>Buckinghamshire Council</b>				
Enforcement of use classes	929.1/19	Write as minuted	√	
Neighbour comments	41/20	Write as minuted	√	
Call-in system	69/20	Town Clerk to forward WW response to MP		
Policy on Neighbourhood Plans	70/20	Cllrs. Cole & Stuchbury to formulate Written Question	√	
Housing need survey	240.2/20	Town Clerk to enquire if basis will be changed to reflect post-Covid circumstances		
TPO trees	242.7/20 300.6/20 352.2	Ask about policy on Protected trees esp. wrt insurance claims Request decision be revoked Refer Tree Policy document to Neighbourhood Plan Group	√ √	See Agenda 5.2 for guidelines
Tingewick Rd roundabout signage	308/20	Contact Highways re previously reported sign damage etc. not yet repaired	√	<b>S. Essam (3/9/20):</b> In my previous email concerning this development, I mentioned that the outstanding works to the roundabout were to be scheduled once the situation around Covid-19 had started to return to something like normal and that that visit would complete the off-site works for the time being. Further delays were caused by some contractual problems that the developer needed to resolve, whereby the original contractor was removed and a new contractor appointed. However, I am pleased to be able to confirm that we have now reached the point where this work, which includes the completion of the partially erected sign (the

## ACTION LIST

## Appendix B

Subject	Minute	Form	Rating √ = done	Response received
	352.1/20 360.1 360.2	Raise change to signage and LH lane & dropped kerbs School crossing signs	√ √ √ √	original contractor ordered incorrect length posts!) and various other works picked up by the Safety Audit, will soon be carried out. A start date of Monday 7 <sup>th</sup> is currently being considered, with a possible duration of around four to five weeks. The work to be undertaken includes the damage to the kerbing, which we have been aware of for some time, although we are not aware of any recent incidents in a similar location, as well as a change to the lane arrows approaching the roundabout from the Tingewick direction. It should be noted that neither the Safety Auditors nor Thames Valley Police, has raised any concerns with the geometry of the roundabout itself. Finally, as I have also mentioned previously, there are still some S278 works to be carried out on Tingewick Road, to install pedestrian refuges and complete some relatively small areas of surfacing in the vicinity of the new junctions, but this will all be finished off at a later, yet to be agreed, date. This effectively means that the developer will retain responsibility for issues relating to the roundabout for some time yet.  Crossing patrol officer has also been reporting fault
Moreton Rd Temp Crossing	304/20	Ask about survey	√	
<b>Call-in requests</b>				
Call-in Procedure	244.3/20	<b>Town Clerk</b> to seek clarification on timing	√	
Call-in requests	355.2/20	<b>Cllr. Mills</b> , 20/02752/APP, M&Co; <b>Cllr. Cole</b> , 20/02511/APP, Pightle Crescent	√ √	
<b>Enforcement reports and queries</b>				
Summerhouse Hill	162.1/20	<b>Mrs Cumming/Cllr. Stuchbury/Clerk</b> to investigate & report lack of management of landscaping at entrance	√	Response received from Weston Homes (7/8/20) The landscapers are attending early next week with a view to ascertain quantities of material. The reinstatement works will follow soon after.
Administration	244.1	Ask about budget allocation	√	
Evaluation and	244.1	Ask about formulating base	√	

## ACTION LIST

## Appendix B

Subject	Minute	Form	Rating √ = done	Response received
review		data for evidence-based review and measuring progress		
6 Cornwall Place	359/20	Query requirement for change of use application	√	<b>See Agenda 6.4</b>
<b>Other:</b>				
Surgery applications	40/20	<b>Town Clerk</b> to investigate whether North End and Verney Close surgeries can be designated Community Assets <b>Environment Committee</b> to set up meeting with Swan Practice		
Future plans	155.2	Letters to BC & MKC as minuted	√	
Page Hill Footpaths	163.2/20	Report deterioration with photos	√	
Signage for Pegasus crossing	208.1	Report signs for 'new' crossing	√	
Bypass river bridge		Report further deterioration	√	
Lace Hill Health Centre	247/20	1. Check s106 status 2. <b>Town Clerk</b> to warn practice about use-by date	√ √	<del>See agenda 6.2 (17/8/20)</del>
	299.2	Get answer in plain English		
S106 use	247/20	<b>Town Clerk</b> to check with other Districts re Sport & Leisure projects	√	
Moreton Road parking	296/20	Write to Akeman & AVE re loss of parking	√	
Solar Farm	297/20	Write to Wessex and RoW re Footpath 24	√	<b>RoW have acknowledged and have indicated a 5m clearway between fences or hedges is required for footpath</b>
Government White Paper consultation	298.1	<b>Town Clerk</b> to contact NALC re response		NALC asked us for views first
	298.2	<b>Committee Clerk</b> - Recommendation to Full		<b>See also Agenda 9</b>

## ACTION LIST

## Appendix B

Subject	Minute	Form	Rating √ = done	Response received
		Council		
MK SPG	298.3	Bring back for discussion		<b>See Agenda 12</b>
Neighbourhood Plan	298.4	<b>Town Clerk</b> to arrange Working Group meeting	√	<b>29<sup>th</sup> September 1pm – 3pm</b> <b>See Agenda 4</b>
33 Bourton Road appeal	301/20	Refer Inspectorate to BNDP green spaces policy	√	<b>See Agenda 7.2</b>
Gilbert Scott Road	361/20	Recommend resident contact Cllr. Chilver	√	

[Back to AGENDA](#)

**BUCKINGHAM TOWN COUNCIL  
PLANNING COMMITTEE  
MONDAY 12<sup>TH</sup> OCTOBER 2020**

Contact Officer: Mrs. K. McElligott, Planning Clerk

**Additional Information for applications on the agenda**

**1 & 2. 20/02991/APP & 20/02992/ALB**  
Moriah Cottage 14 Moreton Road MK18 1LA  
Wisbach



Adjacent Listed Buildings (blue triangles)



Current exterior views (24/9/20)

Planning History (not Trees)

1	98/00074/ALB	ALTERATIONS	Listed Building Refused
2	20/02991/APP	Replacement gate	Pending Consideration
3	20/02992/ALB		



## Appendix C

The site is a Grade II Listed Building on the lower part of Moreton Road opposite the entrance to Minshull Close. It was formerly the coach house for Sandon House, immediately to the north. There are three other Listed Buildings in the vicinity, and the site is within the Conservation Area.

The present rear entrance is via a narrow, outward-opening gate on Moreton Road, which gives immediately onto steep steps to the back door. Behind the fence to the right of the gate is a sunken garden with a shed, with access from the rear garden. The applicant wishes to remake the opening into the lower garden level, where there is room for an inward-opening gate, block up the existing gate opening and infill the steps, tiling the finished surface to match the existing one outside the back door. The new opening would be 50cm wider than the present one.



The shed would be rotated through 90° or replaced, and there would be room to store the bins, which have at present to be bumped down the steps which are barely wider than the recycling bin (approximately 2" clearance each side)

The stated advantages are

- An inward-opening gate, diminishing the danger to passers-by who are not visible from within;
- The present steps are steep, immediately outside the back door, and there is no 'landing' inside the present gate; bins therefore have to be pulled down the steps rather than pushed;
- Ease of putting the bins out. They are unwieldy and given to twisting, and have knocked the applicant over and spilled their contents before now;
- Ease of moving the bicycle in and out; the gate will be on the same level as the shed;
- The heavy bins are damaging the steps;
- Infilling the existing steps will make a level area outside the back door, which is safer, for the applicant and her grandchildren.

The Heritage Officer has described the wall thus:



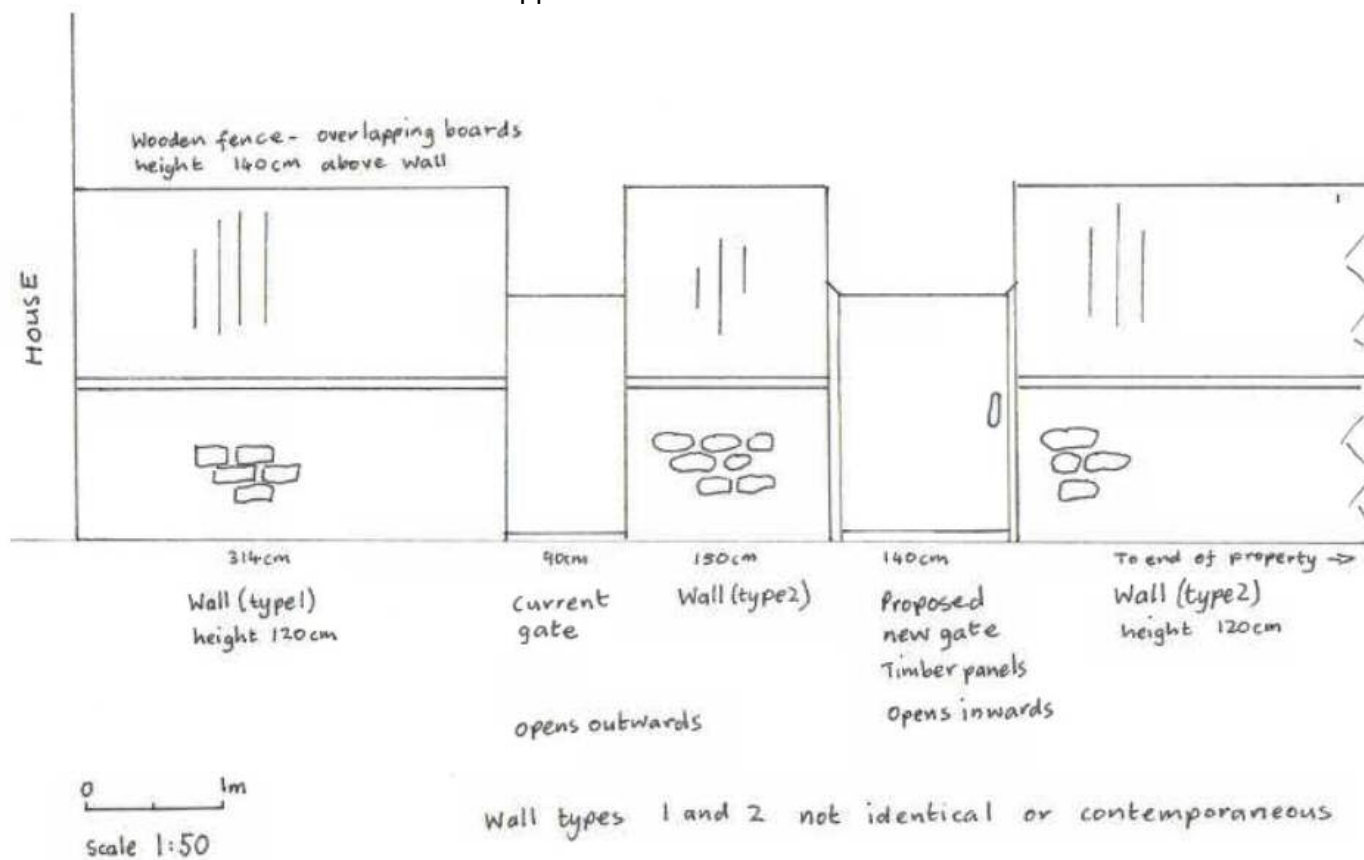
## Appendix C

The boundary wall which is the subject of this application demonstrates a number of different construction types indicating phases of historic alteration. The higher status (older) material seen to the left hand side (LHS) and described as type 1 in the application documents is formed in loose courses of irregular sized blocks, this section of wall has no remaining capping protection. Some of this stone block material can also be evidenced towards the lower parts of the remainder of the wall and to the edge of the existing pedestrian gate opening.

The parts of the wall described within the application as type 2 appears to represent a partial rebuild of the boundary wall introducing new rubble stone over original material with no formal coursing. This section of wall has an arched mortar capping. Mortar has a coarse aggregate mix. Modern panelled fencing provides further screening to the garden above the historic walls and the existing gate is of no heritage significance.

The stone wall although having been somewhat altered still offers a pleasing materiality and contributes positively to the overall appearance of the L[isted] B[uilding], the C[onservation] A[rea] and nearby L[isted] B[uilding]s.

However she notes that the older part of the wall is bowing and showing other deterioration, and is concerned that infilling the steps may cause further pressure. Though supporting the application in principle, she would like to see further details of structural support works and a uniform recapping of the whole, and has reserved a final comment until this information is supplied.



### 3. 20/03066/APP

2 Jacob [Moreton Road Phase I], MK18 1GE

Single storey front extension

*Malpass*

Jacob is a short street parallel to the Moreton Road north of the town-side entrance to Whitehead Way; it is almost hidden from view by the hedgerow. There are accesses to Moreton Road in front of No1 and No4. The four houses face toward the main road with their access road, a grass verge and a footpath between them and the hedge. They were originally of identical design, with variety introduced by differing materials. No1 has had a single storey rear extension, and No2 has already converted the loft to add two bedrooms (to the original four) and a shower room, with three dormers

to the front and three rooflights to the rear (17/03959/APP). Members had No Objections to this application, but noted that they would like reassurance that the house was not being turned into a HiMO. The other two houses remain as built. The front walls of Nos 2 & 3 are in line, but No1 is stepped back, and No4 stepped forward, of this line, see below.



Google satellite view pre-dates addition of dormers & rooflights

1	17/03959/APP	Conversion of existing loft space into residential accommodation, including three roof dormers to the front and three roof lights to the rear.	Approved
2	20/03066/APP	Single storey front extension	Pending Consideration



Jacob from the southern end (No1 nearest)



and Jacob from the northern end (No4 nearest).



№2 Jacob

Nos 1-3; note variety in brick and roof colours

The proposal is to add a pitched-roof front porch and lobby which would project 1.5m (approx. 5feet) forward of the house front, and be 2.8m (9feet) wide, with the door in its front face and windows in the side walls. The door is shown as having glazed side panels, but this is indicatory/subject to client's choice. The top of the door opening would have a soldier course to match the brick detailing over the existing door and windows.



Highways have no objections, and no required conditions.

#### 4. 20/03139/COUC

6 Cornwalls Centre [6 Cornwall Place] MK18 1SB

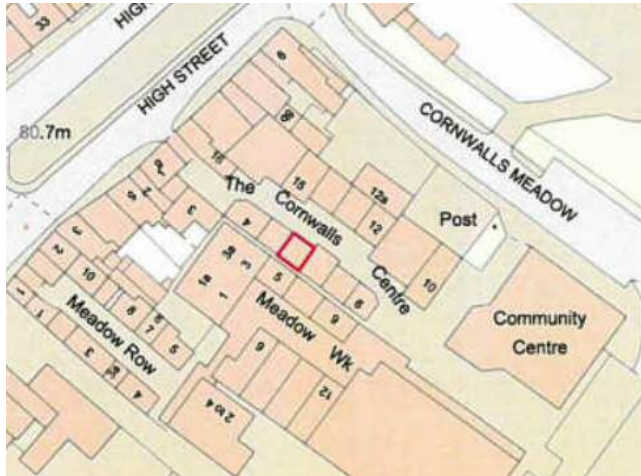
Determination under Class C of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 as to whether prior approval is required in respect of noise impacts, odour impacts, impacts of storage and handling of waste, impacts of hours of opening, transport and highways impacts, impact of the change of use, and the siting, design or external appearance of the facilities to be provided, for the change of use of the premises to licensed coffee shop  
*King*

Members should note the specifics of the description; this is not an application, it is a determination of what supporting documents, if any, are required to aid a decision on the change of use. The majority of the list will be addressed by appropriate departments at County: Noise, odour and food storage by Environmental Health, handling of waste by Waste & Recycling (food waste will be composted for use on their allotment); Transport & Highways by Highways.

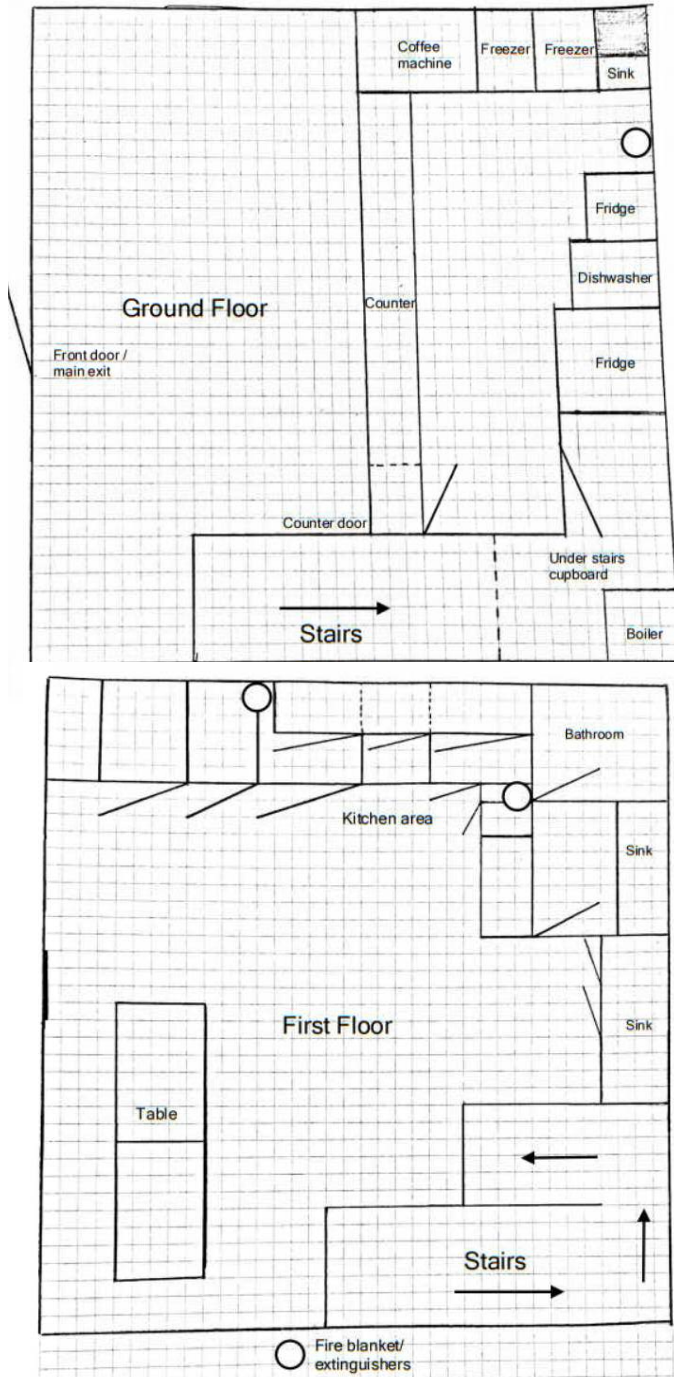
The previous use was as a barbers. The only residential property in the vicinity is №9 Meadow Row (between Homeflair and the newsagents). The Change of Use from A1 to A3 would mean an extension of the hours of operation (8am – 11pm, Sunday – Thursday; 8am – midnight, Friday & Saturday, and the evening before a Bank Holiday, closing times 30 minutes later; and until 2am at New Year), the use of recorded background music during these times. They will be serving coffee, lunch and dinner and use the pedestrian walkway for external seating until 10pm. A liquor licence has been applied for, for 10am – 11pm every day; the alcohol will not be served separately from food. There will be an extraction fan for the kitchen, which could be a source of noise or odour.



The capacity of the private dining room upstairs is 10 (bookings only) and the casual dining area downstairs 10.



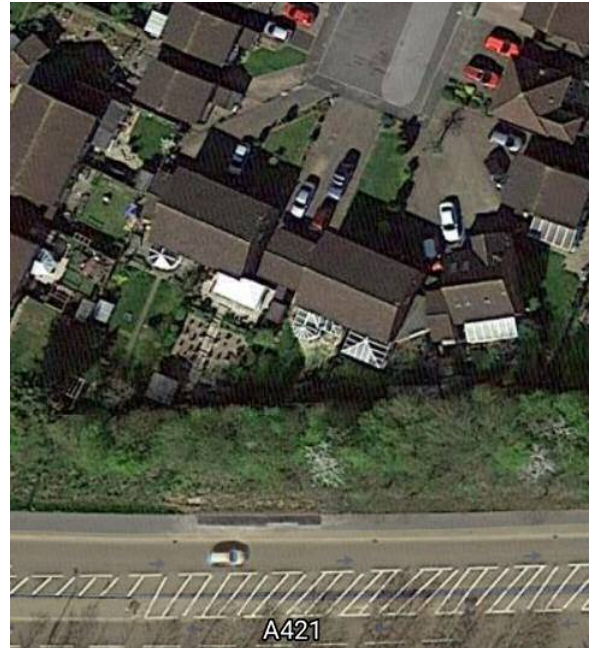
No.6 is 1 unit away from two other premises with outside seating, and another set back beyond that.



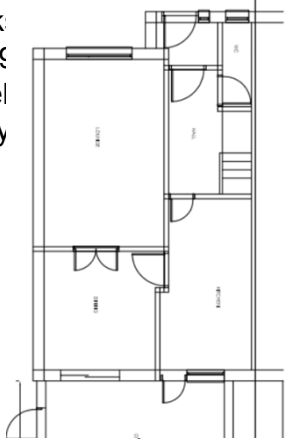
The only response so far (3/10/20) is from Highways:

The proposed development has been considered by the County Highway Authority who has undertaken an assessment in terms of the impact on the highway network including net additional traffic generation, access arrangements and parking provision and are satisfied that the application would not have a material impact on the safety and operation of the adjoining public highway. The County Highway Authority therefore has no highway objections, and in this instance no conditions to be included in any planning permission that you may grant.

5. **20/03256/APP**  
29 Plover Close MK18 7ES  
Extending existing rear conservatory  
*Clarke*



The site is a semi-detached house at the southern end of Plover Close on the Badgers estate; its garden back detached garage block to the side of the house contains garages for both No29 and No30. The house has a noticeably long driveway and front garden, and a conservatory with its end shaded by the bypass trees, and an existing conservatory.



Dotted lines show existing conservatory

The proposal is to replace this conservatory, with its angled bay with lantern roof, with a rectangular conservatory of the same width and wall height and approximately 1.5m longer. The new single slope roof would therefore be at a shallower angle than the existing. The present conservatory has a single door in the rectangular part, facing south into the garden, and double doors in the west wall of the bayed part. The new would have a single door in approximately the same place, a double door also facing into the garden and a single door in the west side, to give access to the side passage between the house and the garage.



Not for consultation

5. 20/03021/ATP

1 Bostock Court, West Street MK18 1HH

1 x Common Beech – reduce canopy over all to create minimum 3m clearance from building line and to balance opposite side;

1 x Copper Beech – reduce overextended branches to improve form;

4 x Lawson Cypress – fell to ground level

1 x Willow – re-pollard

The work suggested is in-line with good arboricultural practice to keep the trees safe and healthy. The Lawson Cypress are not included in the TPO, they are causing excessive shading and have low amenity value.

Hall



1 – Common Beech      2 – Copper Beech      3 – Lawson Cypress ( x4)      4 – Willow

Planning History (trees only)

1	98/00201/ATC	REMOVAL OF CONIFERS IN REAR GARDEM	Approved
2	98/01617/APP	REMOVAL OF CONIFERS	Approved
3	03/01492/ATP	Fell four leylandii, crown lift one beech, one birch and one sycamore by 4.5 metres and crown thin, and cut back to boundary one willow	Application Withdrawn
4	03/02203/ATP	Fell four leylandii and crown lift to 4.5 metres, one silver birch, one green beech and one copper beech and cut back overhanging branches	TPO - Consent Granted
5	09/01589/ATP	Works to trees	TPO - Consent Refused <sup>1</sup>
6	20/03021/ATP	1 x Common Beech - reduce canopy overall to create minimum 3m clearance from building line & to balance opposite side. 1 x Copper Beech - reduce over extended branches to improve form 4 x Lawson Cypress - fell to ground level 1 x Willow - re-pollard the TPO, they are causing excessive shading and have low amenity value.	Pending Consideration

Members are advised that this application has been approved (1/10/20)

<sup>1</sup> Application submitted by house in Old School Court to cut back overhanging branches; no species listed nor extent of works. Declared invalid.

**6. 20/03306/ATC**  
Buckingham Primary School, Foscott Way MK18 1TT

Works to trees  
*Milne*

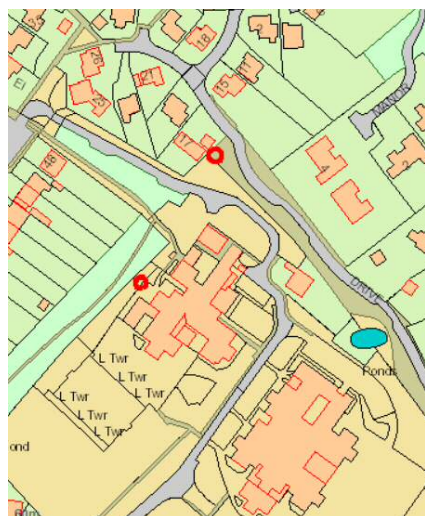
First tree T53 - Sycamore - Mature age class. High priority Tag 1880. Large dead limb over play area. Lower easterly limb is twin stemmed and naturally fused. This will also help manage the tree into decline by presenting a smaller target to wind forces. This limb and crown apex previously reduced to a good standard but appears tree is still struggling to respond. Further deadwood through crown further indicates decline. Excellent habitat value due to numerous cavities. However, retention next to reception years play area is not recommended. Instead retention as a habitat feature felt more appropriate given setting

Proposed works Reduce to leave as c. 4-5m pole. Reduce easterly limbs to 1-2m stubs.

2nd Tree T38- Common Ash - Early Mature Age class Stem leans to north west, over property, but this does not appear to be progressive or indicate instability.

Proposed Works Sever ivy at base and strip 1-2m section from stem. Prune to clear building by 2-3m.

*I have queried this with Buckinghamshire/Trees as the school is not in the Conservation Area; if these are TPO'd trees I would expect there to be some documentation on the website, and there isn't any (5/10/20), not even an application form. The plan below is that on the Map tab, so some information must have been submitted.*



[Back to Agenda](#)



	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
1	Year	Appln	Type	site	Proposal	Shire Councillors						Notes				
2	2016	00151	AOP	Land off Walnut Drive	170 houses							not in our parish				
3						CC	SC	TM	HM	RS	WW	Later contact if any	date of BTC agenda	Response	Committee Date	Decision
4	2018	00932	APP	19 Castle Street	6 flats above shop							amended plans	20/4/20	& 17/04671/ALB; Oppose until HBO satisfied		
5		01098	APP	23/23A/23B Moreton Road	split 3 houses into 6 flats							amended plans	23/03/20 and 6/7/20	no change to original response; deferred for more information		
6		04290	APP	West End Farm	72 flats/Care Home	-	-	-	-	√	-	amended plans	4/2/19	no change to original response	<b>WITHDRAWN 27/2/20</b>	
7		04626	APP	Overn Crescent	4 houses	-	-	√	-	-	-	amended plans	22/6/20	no change to original response		
8																
9	2019	00148	AOP	Land at Osier Way	up to 420 houses	-	-	-	-	√	-					
10		00391	APP	The Workshop, Tingewick Rd	ch/use & new access	-	x	-	-	-	-	amended plans	3/2/20	Oppose & Attend		
11		00902	ADP	Land adj 73 Moreton Road	Reserved matters - 13 houses	-	x	-	-	-	-					
12		001476	APP	Station House, Tingewick Road	11 houses	-	-	-	?	-	-	additional document	27/2/20	no change to original response		
13		01564	APP	12-13 Market Hill (M&Co)	9 flats over and 23 newbuild flats behind	-	-	-	-	-	-			<i>Revised application 20/02752/APP submitted August 2020, see below</i>	Officer decision	Refused 6/7/20
14		02627	AAD	Old Town Hall	signage (retrospective)	-	-	-	-	-	-	amended plans	24/2/20	response changed to No Objections subject to the satisfaction of the HBO		
15		03531	APP	10 Tingewick Road (Hamilton Precision site)	variation 16/02641/APP 50 houses	-	-	-	-	√	-					
16		03624	ALB	Old Town Hall	signage (retrospective)	-	-	-	-	-	-	amended plans	24/2/20	response changed to No Objections subject to the satisfaction of the HBO		
17																

Key √ = call-in actioned; x = refused; - = no response; ? = considered but not confirmed

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
18	2020	00483	APP	Land behind 2 Market Hill	7 flats	-	-	-	-	-	-	add'l plans amended plans	23/03/20; & 17/8/20	no change; response changed to No Objections		
19		00510	APP	Moreton Road III	130 houses	-	-	-	-	√	-					
20		01018	APP	7 Krohn Close	extensions	-	x	-	-	-	-	amended plans	17/8/20	no change to original response	officer decision	Approved 3/9/20
21		01240	APP	5 The Villas	extension	-	-	-	-	-	√	add'l plans	22/6/20	no change to original response	<b>WITHDRAWN 18/9/20</b>	
22		02013	APP	10 Hilltop Avenue	Fence and shed	-	-	x	-	-	-				officer decision	Refused 23/9/20
23		02506	ALB	50-51 Nelson Street	change #51 to HMO	not possible for ALB							in combination with 20/01830/APP			



**Directorate for Planning, Growth & Sustainability**

**Planning & Environment**

Service Director: Steve Bambrick

Buckinghamshire Council

The Gateway

Gatehouse Road

Aylesbury

HP19 8FF

[REDACTED]  
[REDACTED]  
[www.buckinghamshire.gov.uk](http://www.buckinghamshire.gov.uk)

24 September 2020

Dear

**Buckinghamshire Council's response to the governments consultation *Changes to the Current Planning System*.**

Buckinghamshire Council attaches its response to the governments consultation "Changes to the Current Planning System". The council asks that you endorse its response which sets out an improved housing needs calculation to ensure that sustainable development can occur without detriment to Buckinghamshire.

The council supports the use of a *standard method* for establishing housing needs in principle; but does not support the current method or the method proposed in the consultation.

The Office for National Statistics identifies a growth of 1.6 million households in England from 2020 to 2030 based on past trends. The proposed changes to the standard method more than doubles this number to 3.37 million dwellings without any evidence.

The Council does not believe that there is any justification to support an increase of this scale; so would invite the Government to re-evaluate the number of homes needed over the next decade. Such a review would not undermine the Government's existing commitment to deliver a million homes during this Parliament. The proposed standard method is artificially geared to produce a need for 300,000 homes each year – a need which is not based on evidence.

Buckinghamshire's current performance on housing completions is currently around 1,500 homes each year. Our tested evidence base (HEDNA) suggests an appropriate level of need moving forward as being around 2,300 homes each year. The council believes there to be a number of significant flaws in the proposed methodology, all of which are set out in our technical response. For example, the additional weighting in the proposed methodology for housing affordability would skew the requirement in Buckinghamshire such that the local housing need would be almost double the number identified by our evidence and over 3 times more than is currently provided.

This cannot be right and it is simply unrealistic to expect a step change in delivery of such a magnitude. The council's technical response demonstrates how the methodology can be appropriately amended to better reflect existing evidence and also better reflect the reality of delivery on the ground.

In addition, whatever the outcome of the consultation, government must take account Buckinghamshire's very significant constraints; including the Green Belt and the Chilterns AONB.

The Council's technical response also includes opinion on the questions raised in relation to delivering First Homes, supporting small and medium sized developers and extending the current Permission in Principle to major development.

Yours sincerely

Cllr Warren Whyte  
Cabinet Member for Planning and Enforcement



## Appendix A – Proposed response to Government’s recent consultation: “Changes to the Current Planning System”

### The standard method for assessing housing numbers in strategic plans

#### Consultation Qs 1-7:

*Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?*

*Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.*

*Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method’s baseline is appropriate? If not, please explain why.*

*Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.*

*Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.*

*Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:*

*Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?*

*Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate?*

These are addressed below.

#### Summary

Buckinghamshire Council was established as a new unitary authority in April 2020 and comprises the former districts of Aylesbury Vale, Chiltern, South Bucks and Wycombe and Buckinghamshire County Council.

Buckinghamshire Council supports the use of a Standard Method for establishing housing need in principle; but does not support the approach set out in current Guidance or the proposed changes to that approach.

Buckinghamshire Council agrees that there was a need to increase housing supply in England and notes the Government's ambition to deliver a million homes over this Parliament; but is concerned that there is no evidence to support 300,000 homes per year, even as a short-term target.

Buckinghamshire Council recognises that housing need must address previous housing undersupply as well as provide for future household growth, but the planned numbers must be informed by the latest evidence.

The Office for National Statistics identifies a growth of 1.6 million households in England from 2020 to 2030 based on past trends. The proposed changes to the Standard Method more than double this number to 3.37 million dwellings without any evidence.

Buckinghamshire Council does not believe that there is any justification to support an increase of this scale, so the Government needs to re-evaluate the number of homes needed over the next decade – which would not undermine the existing commitment to deliver a million homes during this Parliament.

Buckinghamshire Council is concerned that using the Standard Method to calculate need for each of their former local authorities yields a total that is over 1,000 dwellings (around 25%) higher each year than when the calculation is undertaken for the county as a whole (4,139 cf. 3,111 dpa). Whilst some difference is to be expected, both calculations should yield similar numbers.

Buckinghamshire Council proposes three specific revisions to the proposed changes:

**The Standard Method calculation should use the 10-year migration variant scenario to increase stability in the figures for all local authority areas.**

**The Standard Method calculation should take 0.5% of dwelling stock as a baseline in every area, and then add half of the annual household growth to reduce the impact of extreme household projections.**

**The Standard Method calculation for change in affordability should be based on a quarter of the difference between the ratios (in the same way as current affordability is a quarter of the difference from the benchmark); with a square root taken to avoid any extreme adjustments.**

These three specific revisions to the proposed changes:

1. Provide a robust, evidence-based housing need figure for Buckinghamshire that is consistent with existing evidence that has been rigorously tested through the planning process.
2. Reinforce the Government's commitment on the need to deliver 1 million new homes over the course of this Parliament.
3. Establish an overall housing need figure of 2.45 million homes for England over the next decade, enough to meet household growth and address previous housing undersupply.

### Use of the 10-year Migration Variant Scenario

Buckinghamshire Council is concerned that using the principal scenario from the household projections does not provide sufficient stability for plan-making:

The 2016-based projection showed a growth of 18,382 households from 2020 to 2030, whereas the 2018-based projection identifies 13,477 households over the same period: 4,905 fewer households, equivalent to a reduction of 26.7%.

Using the 10-year migration variant scenario increases stability: this scenario in the 2016-based projection showed a growth of 17,133 households from 2020 to 2030, compared to the 2018-based projection of 15,875 households: a difference of 1,258 households, equivalent to only 7.3%.

**The Standard Method calculation should use the 10-year migration variant scenario to increase stability in the figures for all local authority areas.**

The following table sets out the projected household growth for Buckinghamshire over the decade 2020-30 based on the official projections.

Area	Change in total households 2020-2030				
	Principal projections			10-year migration variant	
	2014-based	2016-based	2018-based	2016-based	2018-based
Aylesbury Vale	10,002	11,152	10,473	9,067	9,501
Chiltern	2,447	2,068	1,252	1,959	1,496
South Bucks	3,080	2,114	946	2,530	2,075
Wycombe	5,395	3,048	806	3,577	2,803
<b>Buckinghamshire</b>	<b>20,924</b>	<b>18,382</b>	<b>13,477</b>	<b>17,133</b>	<b>15,875</b>

The principal projection has reduced from 20,924 households identified by the 2014-based projections to 13,477 households identified by the 2018-based projections; a reduction of 7,447 households, equivalent to a fall of 35.6%.

Considering the difference between the 2016-based and 2018-based projections, there is a reduction of 4,905 households, equivalent to a fall of 26.7%.

The principal projections are volatile due to their reliance on short-term migration trends to distribute population and household growth between local authority areas.

The ONS now publish a variant scenario which uses longer-term migration trends (using 10 years of data) to distribute growth between areas. This reduces volatility and therefore increases stability, which is helpful when planning for housing.

The 10-year migration variant scenarios for Buckinghamshire identify a higher level of growth than the 2018-based principal projection, but a lower level of growth than the 2016-based principal

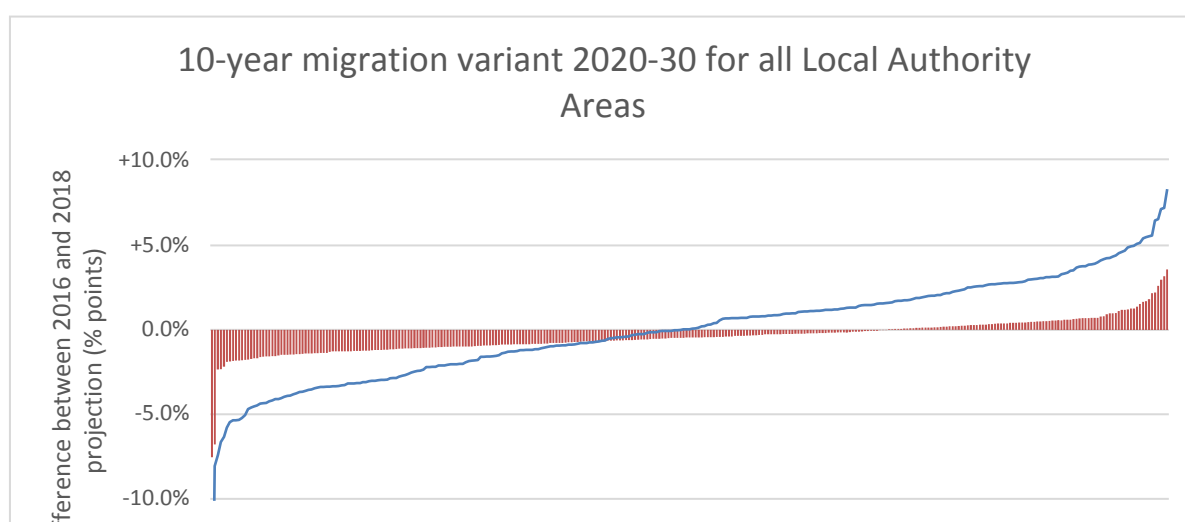
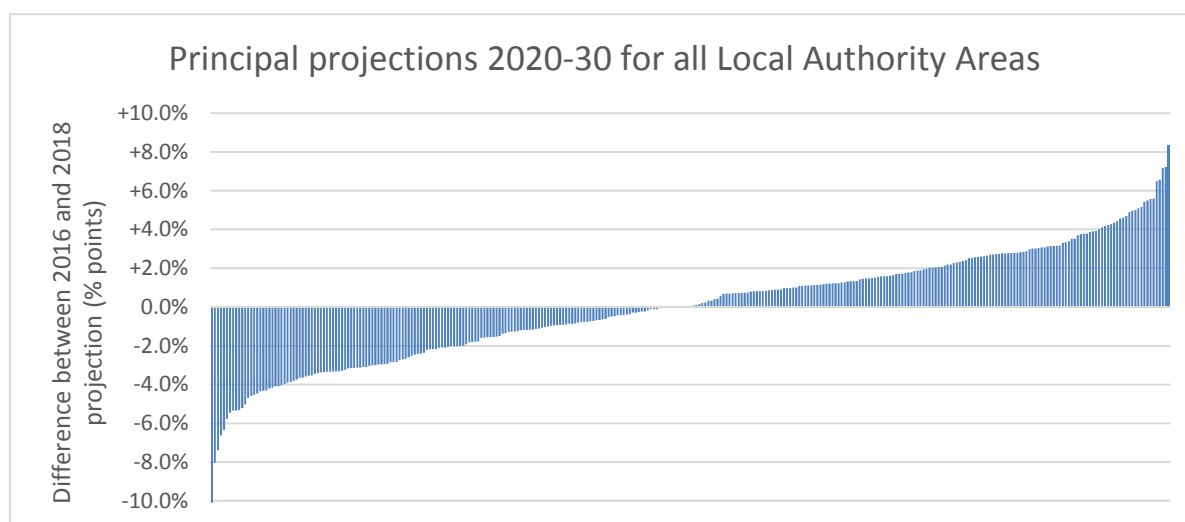
projection. Importantly, the figures are closer together and less susceptible to change from one release of data to the next.

The 10-year migration variant scenario has reduced from 17,133 households identified by the 2016-based projections to 15,875 households identified by the 2018-based projections; a reduction of 1,258 households equivalent to a fall of 7.3%.

From the table, it is evident that the 10-year migration variant scenario also reduces volatility for each of the former local authority areas. For example, the principal projection for Wycombe reduced from 3,048 to 806 between the 2016-based and 2018-based data (a reduction of 2,242, equivalent to 73.6%); whereas the 10-year migration variant has reduced from 3,577 to 2,803 households, a reduction of 774 households equivalent to 21.6%.

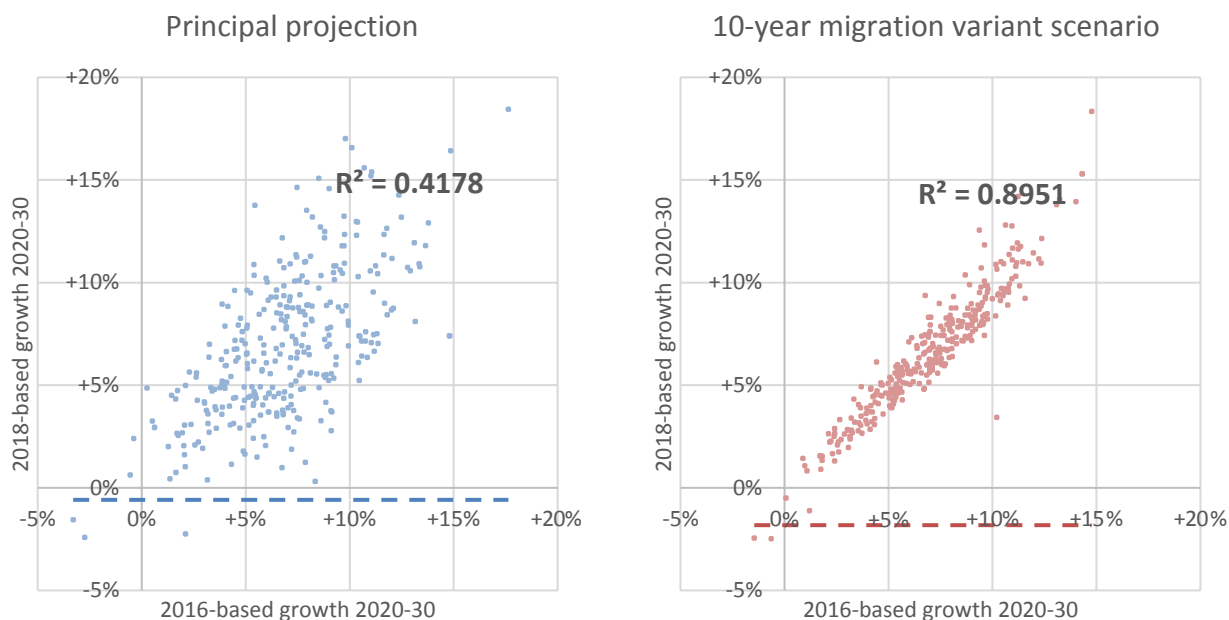
Using the 10-year migration variant scenario will not mean that there is no change to the figures in each area, but the changes will be less extreme.

The first chart below shows the difference between the percentage growth identified by the principal projection from the 2016-based data and from the 2018-based data for each local authority over the period 2020-30 (ranked from largest reduction to largest increase); and the second chart shows the differences between the 10-year migration variant scenarios.





The scatter diagrams below also show the extent of consistency between the 2016-based and 2018-based projections, with each local authority represented by a dot on the chart. There is a very strong correlation between the two projections when the 10-year migration scenario is compared, whereas the relationship is far weaker between the principal projections.



It is clear that the lower levels of variability shown for Buckinghamshire apply across all areas, with the 10-year migration scenario providing far more stable figures than the principal projections.

On this basis, there is clear reason to favour the 10-year migration variant scenario of the latest projection (currently the 2018-based figures) as the new input for the Standard Method.

This does not change the overall household growth for England: both the principal projection and the 10-year migration variant identify a growth of 1,604,434 households across England. It is only the distribution between local areas that is affected by the choice of projection, and the 10-year migration variant provides far more stability when planning for housing.

### Use of Existing Stock within the Calculation

Buckinghamshire Council supports the use of existing stock as an input to the Standard Method calculation; however, this should form a consistent input across all areas, and not simply be used to inflate the baseline figure in areas where the household projections are too low:

Average household growth from 2020 to 2030 totals 300 per year across in Chiltern, South Bucks and Wycombe, which represents a growth rate of 0.2%; whereas the stock was 143,763 dwellings, and 0.5% of this yields a much higher baseline of 719.

In contrast, average household growth from 2020 to 2030 totals 1,047 per year in Aylesbury Vale, an annual growth rate of 1.3%; whereas the stock was 82,018 dwellings, and 0.5% of this yields a much lower baseline of 410.

Combining the four areas yields a total baseline of 1,766 based on the proposed changes, comprised of the annual household growth in Aylesbury Vale (1,047) and 0.5% of the stock in the remaining areas (719).

However, Buckinghamshire as a whole has an average household growth of 1,348 per year (growth of 0.6%) with 0.5% of the stock yielding a baseline of 1,129; so based on the proposed changes, the household projection would provide the baseline at 1,348 per year – a figure that is 418 lower (24%) than the total for the combined areas.

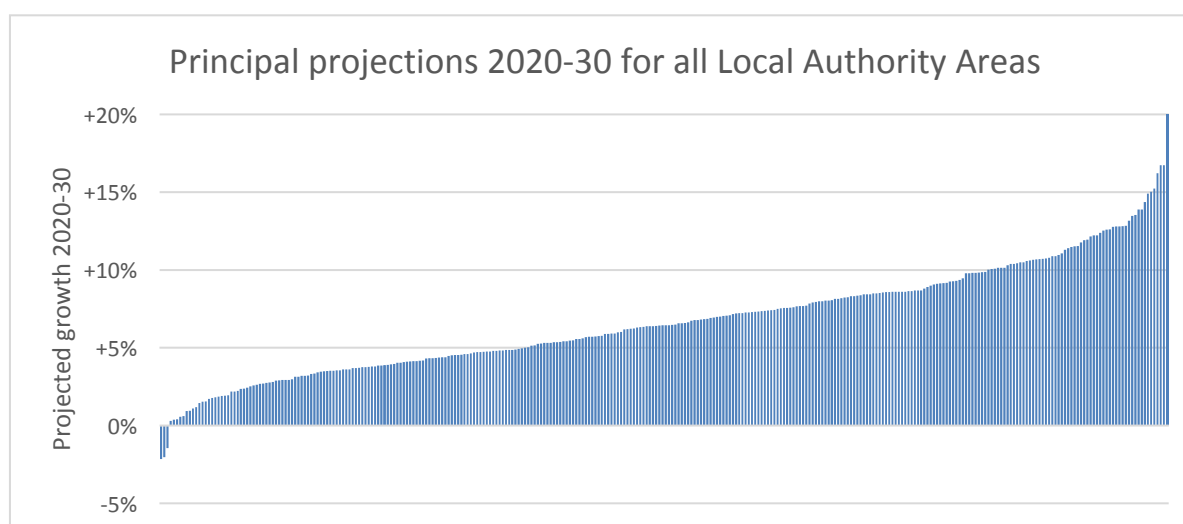
This cannot be right. The household projection is too low across Chiltern, South Bucks and Wycombe, but the projection for Aylesbury Vale is too high. Both must be considered.

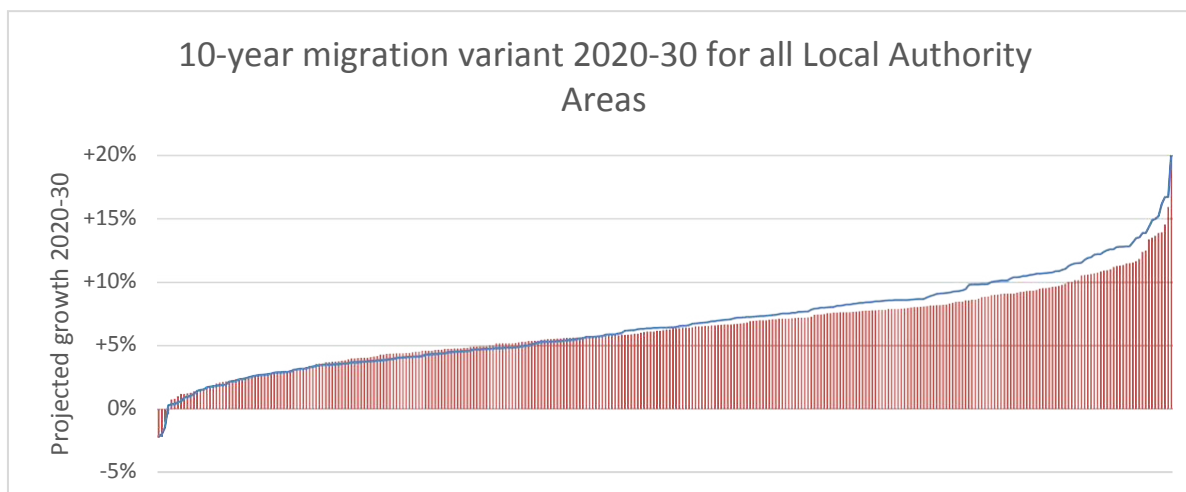
The Standard Method calculation should take 0.5% of dwelling stock (or another fixed percentage) as a consistent baseline for all areas, and then add to half (or another consistent proportion) of the annual household growth.

This approach would yield a baseline of 1,803 for Buckinghamshire – with the same total for the county and for the four districts combined. The annual baseline for England would be 202,288.

**The Standard Method calculation should take 0.5% of dwelling stock as a baseline in every area, and then add half of the annual household growth – reducing the impact of extreme household projections.**

The first chart below shows the percentage growth identified by the 2018-based principal projection for each local authority over the period 2020-30 (ranked from smallest to largest increase); and the second chart shows the growth based on the 10-year migration variant scenario.

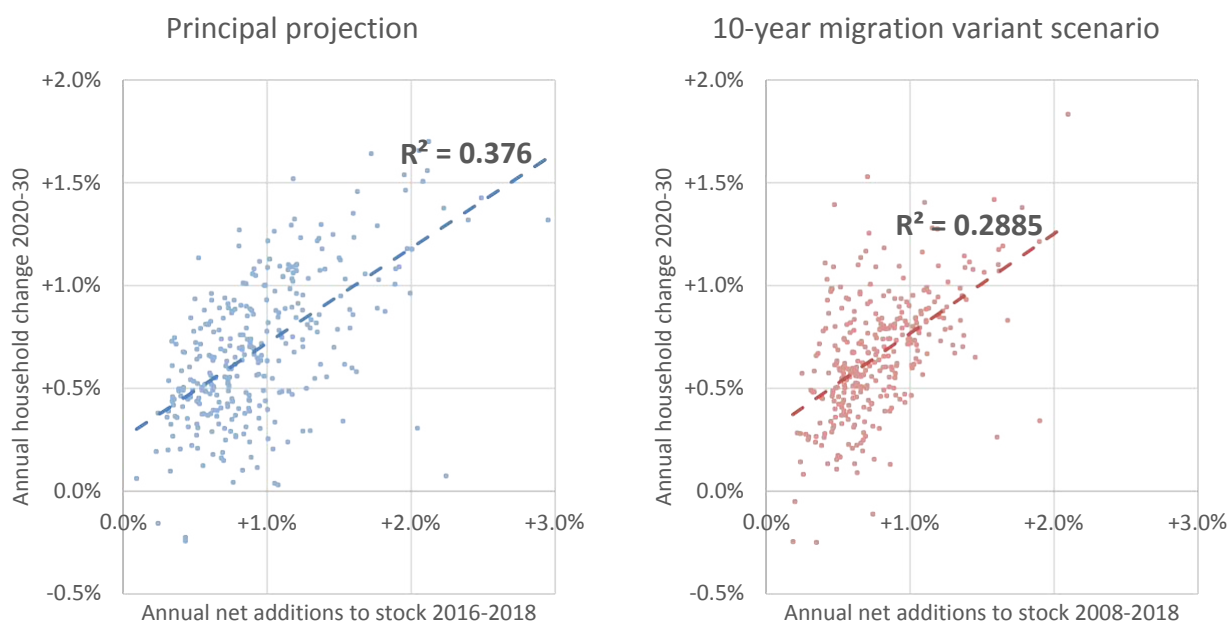




A total of 114 local authority areas fall below the 5% threshold based on the principal projection, equivalent to more than a third of all areas; and even based on the 10-year migration variant, there are 103 local authority areas below the threshold.

However, the main driver for differences between the rate of growth in different local authority areas is the rate of housing supply during the trend-period that is used for establishing migration.

The charts overleaf show the relationship between the growth projected by the 2018-based principal projection over the period 2020-30 and the percentage of net additions to the stock from 2016-2018 (the period used for establishing migration trends for the principal projection); and the relationship between the growth projected by the 10-year migration variant projection over the same period and the percentage of net additions to the stock from 2008-2018 (the period used for migration trends in the 10-year variant).



The  $R^2$  value shows the extent of correlation between the projected growth and net additions to the stock. There is a relationship of 0.376 on the principal projection, which yields a correlation

coefficient of 61.3%; and a relationship of 0.2885 on the 10-year migration variant, so a correlation coefficient of 53.7%.

Both clearly demonstrate the relationship that past housing supply has a significant influence on future household projections.

Whilst this will always be the case, the impact of historic supply will be reduced if only part of the baseline is taken from the household projections.

The proposed changes suggest that 0.5% of the existing dwelling stock should be used instead of the annual household growth where this figure is higher – which addresses the problem of the baseline figure from the household projections being too low. However, this means that around a third of all local authorities would start from a uniform growth of 0.5% of their stock, regardless of their household growth – with those with negative growth having the same proportionate baseline as those with growth at very nearly 0.5%. So the proposed method fails to differentiate between areas with low levels of growth using the local evidence.

Furthermore, no adjustment is proposed for those areas where the household projections are too high – mainly areas which are already delivering significant levels of additional housing. The outputs of the calculation have no regard to the existing dwelling stock in these areas.

To mitigate both of these shortcomings, we would suggest that the baseline should comprise two parts.

In all local authority areas

1. The initial baseline should set at 0.5% of the dwelling stock;
2. Then half of the average annual household growth projected by the 10-year migration variant scenario for the period 2020-30 should be added to this number.

This would provide a consistent calculation for all areas.

The baseline figure would take account of both the existing stock in every area, and also the projected household growth.

The approach would avoid a uniform baseline rate being applied across a large number of local areas.

Any areas with extreme household growth (either too high or too low) would be mitigated, and the influence of past housing supply on the baseline number would be reduced.

This would also ensure that Buckinghamshire would have the same figure for the county as the sum of its four former local authority areas.

The impact of this change would be to increase the baseline from the growth of 160,443 households each year for England identified by the 2018-based projections, to a baseline need for 204,210 dwellings which would form the basis for the affordability adjustment.

## Proposed Changes to the Affordability Adjustment

Buckinghamshire Council agrees that there should not be a cap applied to the housing need calculation. However, the adjustment for affordability should be based on a calculation that is designed to avoid any extreme increases from the baseline figure. Both the current calculation and the proposed changes fail this test.

The current Standard Method yields affordability adjustments of 1.851 for Chiltern, 1.723 for South Bucks, 1.463 for Wycombe, and 1.398 for Aylesbury Vale. The adjustment for Buckinghamshire is 1.483, which is in line with the combined impact of the four separate adjustments.

The proposed changes yield affordability adjustments of 3.089 for Chiltern, 2.920 for South Bucks, 2.403 for Wycombe, and 2.098 for Aylesbury Vale; and a Buckinghamshire adjustment of 2.308.

The baseline figure already provides for all of the projected household growth, and it is already difficult to justify an increase of almost 50% (the outcome of the current approach, before the cap). It seems impossible to justify an increase that more than doubles the projected growth – the proposed changes yield an adjustment that is disproportionately large.

The affordability adjustment in the current Standard Method is based on quarter of the difference between the latest affordability ratio and the benchmark ratio of 4.0; whereas the proposed changes are based on the whole difference between the latest affordability ratio and the ratio from 10-years ago. This means that change in affordability has a greater influence than the current level. For consistency, both measures should be based on quarter of the difference.

Whilst a cap is not appropriate, the adjustment should be based on the square root of this new calculation, to avoid the affordability adjustments becoming extreme in any area.

**The Standard Method calculation for change in affordability should be based on a quarter of the difference between the ratios (in the same way as current affordability is a quarter of the difference from the benchmark); with a square root taken to avoid any extreme adjustments.**

PPG [ID 2a-004-20190220] sets out the calculation for the current affordability adjustment:

### ***Step 2 - An adjustment to take account of affordability***

*Then adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area.*

*The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used.*

*No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4 (with a ratio of 8 representing a 100% increase), the average household growth should be increased by a*

quarter of a percent. To be able to apply the percentage increase adjustment to the projected growth figure we then need to add 1.

Where an adjustment is to be made, the precise formula is as follows:

$$\text{Adjustment factor} = \left( \frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

This confirms that “for each 1% the ratio is above 4, the average household growth should be increased by a quarter of a percent”.

In other words, household growth is increased by **25%** where the current ratio is **4.0x** above the threshold value of 4.0.

The proposed changes maintain the same adjustment for the current affordability ratio, but introduces a second adjustment based on the 10-year change in affordability using the following calculation:

$$(\text{Local affordability ratio}_{t=0} - \text{Local affordability ratio}_{t=-10}) \times 0.25$$

Based on this calculation, an increase of 1.0 in the affordability ratio will lead to the household growth being increased by 25%.

In other words, household growth is increased by **25%** where the ratio has increased by **1.0x** over the 10-year period; and household growth is increased by **100%** where the ratio has increased by **4.0x**.

As a consequence, the affordability is far more sensitive to the 10-year change in affordability than it is to the current affordability level.

The average adjustment for the current affordability component is 32.8% across all local authority areas, ranging from 0% (where current affordability is below the 4.0 threshold) to 222.6% (in the London Borough of Kensington and Chelsea, where the current affordability ratio is 39.62).

The average adjustment for the change in affordability component is 57.3% across all local authority areas, ranging from an increase of 426.3% (again in the London Borough of Kensington and Chelsea, where the affordability ratio increased from 22.57 in 2009 to 39.62 in 2019) to a reduction of 25.3% (in Eden, where the affordability ratio reduced from 8.87 in 2009 to 7.86 in 2019).

Considering the overall affordability adjustment for Eden, the current ratio yields an increase of 24.1% but this is entirely offset against the reduction of 25.3% as a consequence of the 10-year change; with the overall Adjustment Factor being calculated:

$$0.241 - 0.253 + 1 = 0.988$$

Given that the Adjustment Factor is less than 1.0, the local housing need for Eden will be lower than the baseline figure established at Step 1 of the calculation; that is despite the current affordability ratio for the area being 7.86. It cannot be right to plan for fewer homes than identified by the baseline in an area where affordability remains at almost double the threshold value of 4.0.

Considering the other extreme, the overall affordability adjustment for Kensington and Chelsea, the current ratio yields an increase of 222.6% which is added to the increase of 426.3% as a consequence of the 10-year change; with the overall Adjustment Factor being calculated:

$$2.226 + 4.263 + 1 = 7.489$$

An Adjustment Factor of almost 7.5 means that the local housing need will provide 7.5 homes for every 1 counted within the baseline, which is based on 0.5% of the dwelling stock (439 per year) – so the proposed changes to the Standard Method calculation yield a housing need of 3,285 dwellings each year, whereas the household projections identify a growth of 156 households per year for the area. It is implausible to suggest there is a need for 32,850 new homes in an area with a projected growth of 1,558 households.

This example may be extreme; but the Standard Method calculation needs to establish a plausible, robust Local Housing Need figure for all areas.

It seems inconsistent for household growth to be increased by 25% where the current ratio is 4.0x above the threshold value of 4.0; but increased by 100% where the ratio has increased by 4.0x in the local area over a 10-year period. This places undue emphasis on the change relative to the current ratio.

We would therefore suggest that the calculation for the change in affordability should also be divided by 4, consistent with the approach for current affordability:

$$\frac{(\text{Local affordability ratio}_{t=0} - \text{Local affordability ratio}_{t=-10}) \times 0.25}{4}$$

This would mean that household growth was increased by 25% where the current ratio is 4.0x above the threshold value of 4.0; and also increased by 25% where the ratio has increased by 4.0x in the local area over a 10-year period.

As a consequence, the Adjustment Factor for Eden would become:

$$0.241 - 0.063 + 1 = 1.178$$

This would yield a housing need figure that was 17.8% higher than the baseline growth.

The Adjustment Factor for Kensington and Chelsea would become:

$$2.226 + 1.066 + 1 = 4.292$$

This would still yield a housing need figure that was more than four times larger the baseline growth, equating to an annual housing need of 1,884 dwellings. This remains implausible, suggesting a need for 18,840 new homes in an area with a projected growth of 1,558 households.

Under the current Standard Method, the affordability adjustment is capped at 40% of either the projected household growth or the current housing requirement, depending on the current status of housing policies. However, it is wrong to limit housing need with an arbitrary cap – especially when the cap applies in a large number of areas.

Instead, the calculation needs to avoid extreme adjustments that can be caused by using a linear scale in areas with very high ratios. To produce a non-linear scale, we would suggest that the

Adjustment Factor be based on the square root of the proposed calculation (after taking account of the adjustment previously set out above).

This final revision to the proposed method would yield an adjustment factor of 1.085 for Eden; and the adjustment for Kensington and Chelsea would be 2.072 which yields a housing need of 910 dwellings per year, a total of 9,100 over the decade. This remains considerably higher than the household projections – but these do appear to be unreasonably low, and a growth of 9,100 dwellings would represent an increase of 10.4% to the dwelling stock, which is close to the average growth needed nationally.

### **Consequence of these Specific Revisions to the Proposed Changes**

Taking account of the all three revisions, the annual housing need for England would be 245,455 dwellings. This represents more than a million homes over a 5-year Parliament, with a total of 2.45 million new homes over the decade – 650 thousand more than the household growth, enough to address previous housing undersupply.

Reviewing the overall figures for the extreme case of Kensington and Chelsea, the housing need would be 14,320 dwellings over the decade, equivalent to an increase of 16.3% in the dwelling stock. This represents a plausible rate of growth for a London Borough, despite the extreme nature of some of the data:

0.5% of the dwelling stock = 439 per year

*plus*

Half the annual household growth,  
using the 2018-based 10-year migration variant = 252 per year

*equals*

Baseline figure = 691 per year

Adjustment factor = 2.072

**Local Housing Need = 1,432 per year**

On the same basis, the annual housing need for Buckinghamshire would be 2,499 dwellings, based on the following calculation:

0.5% of the dwelling stock = 1,129 per year

*plus*

Half the annual household growth,  
using the 2018-based 10-year migration variant = 794 per year

*equals*

Baseline figure = 1,923 per year

Adjustment factor = 1.300

**Local Housing Need = 2,499 per year**



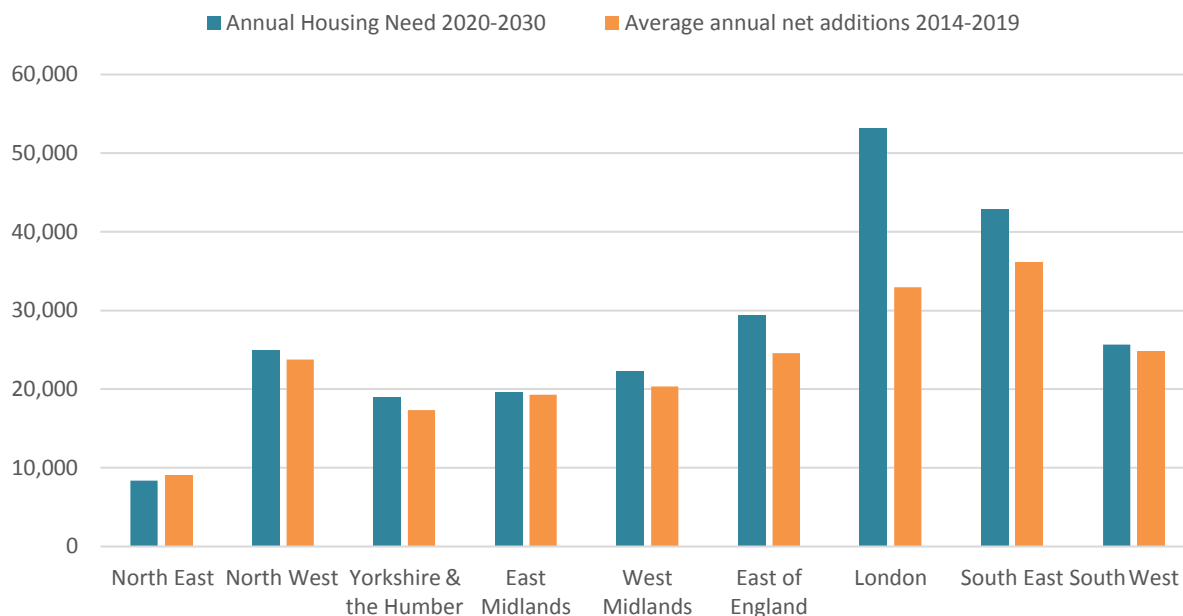
This is broadly consistent with the overall housing need established by the HEDNA: 46,042 dwellings over the 20-year period 2013-2033 (equivalent to an average of 2,302 dpa), a figure that was tested and endorsed by the Inspector that examined the Wycombe Local Plan.

Housing supply across Buckinghamshire was averaging 1,563 dwellings annually over the previous decade (2003-2013) and the identified housing need figure (2,499 dpa) provides the basis for the step-change that the Government is seeking to achieve.

The following table summarises the outcome of the revised calculation for each region, and the subsequent chart compares the identified housing need for the period 2020-2030 with recent housing supply, in terms of average annual net additions to the dwelling stock over the 5-year period 2014-2019.

The largest uplift to the baseline need is in London, followed by the South East and East of England; and these regions also have the largest annual need as a percentage of the existing stock. It is also these areas that have the largest shortfalls in terms of average annual housing supply. Whilst there are shortfalls in all of the other regions (with the exception of the North East, where housing need and supply are in balance), recent supply is generally within 10% of the identified need in all regions outside the Wider South East.

Region	0.5% of existing dwelling stock at 2019	50% of annual household growth 2020-2030	Baseline Need	Adjustment Factor	Annual Housing Need 2020-2030	
					Total dwellings	% of dwelling stock
North East	6,184	1,836	8,020	1.0435	8,369	0.68%
North West	16,500	6,616	23,117	1.0812	24,993	0.76%
Yorkshire & the Humber	12,203	5,420	17,622	1.0748	18,940	0.78%
East Midlands	10,515	6,810	17,326	1.1318	19,610	0.93%
West Midlands	12,563	7,435	19,997	1.1173	22,344	0.89%
East of England	13,527	10,172	23,699	1.2427	29,450	1.09%
London	17,962	19,131	37,092	1.4339	53,185	1.48%
South East	19,718	14,150	33,868	1.2663	42,887	1.09%
South West	12,889	8,657	21,546	1.1917	25,677	1.00%
<b>England</b>	<b>122,060</b>	<b>80,227</b>	<b>202,288</b>	<b>1.2134</b>	<b>245,455</b>	<b>1.01%</b>



Whilst an annual need of 245,455 dwellings is lower than the current 300,000 target, it establishes an overall housing need figure of 2.45 million homes for England over the next decade. This is enough to meet household growth and address previous housing undersupply, and it reinforces the Government's commitment on the need to deliver 1 million new homes over the course of this Parliament.

If there is evidence to justify a higher housing need, this could still be achieved with a minor change to the proposed revisions.

The calculation for the affordability adjustment uses a divisor of 4 within the current calculation, and we have proposed that the same divisor should also be applied when establishing the adjustment for 10-year change. However, this divisor could be changed – albeit we would suggest that the same factor should be used for both current affordability and the 10-year change.

The following table sets out the impact of different divisors within the affordability calculation on the resulting adjustment factors and overall housing need:

Region	Baseline Need	Affordability using divisor of 4		Affordability using divisor of 3		Affordability using divisor of 2	
		Adj. Factor	Annual Housing Need	Adj. Factor	Annual Housing Need	Adj. Factor	Annual Housing Need
North East	8,020	1.0435	8,369	1.0574	8,481	1.0846	8,699
North West	23,117	1.0812	24,993	1.1064	25,577	1.1547	26,693
Yorkshire & the Humber	17,622	1.0748	18,940	1.0983	19,355	1.1437	20,155
East Midlands	17,326	1.1318	19,610	1.1721	20,307	1.2483	21,628
West Midlands	19,997	1.1173	22,344	1.1533	23,064	1.2217	24,431
East of England	23,699	1.2427	29,450	1.3131	31,118	1.4432	34,202
London	37,092	1.4339	53,185	1.5510	57,531	1.7619	65,352
South East	33,868	1.2663	42,887	1.3429	45,481	1.4840	50,259
South West	21,546	1.1917	25,677	1.2489	26,909	1.3558	29,213
<b>England</b>	<b>202,288</b>	<b>1.2134</b>	<b>245,455</b>	<b>1.2745</b>	<b>257,823</b>	<b>1.3873</b>	<b>280,633</b>

On this basis, it would be possible to refine the revisions to yield higher levels of housing need, if those could be justified.

### **Delivering First Homes**

#### **Consultation Qs 8-16:**

The Council does support Securing of First Homes through developer contributions in the short term until the transition to a new system.

*Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions?*

The requirement for a flat rate minimum percentage of 25% of affordable units on site to be First Homes does raise the risk of other cheaper home ownership products (e.g. shared ownership) being squeezed off developments. In high value areas, this may mean that the pool of people who could afford to buy the units will be more limited than would be the case if there was wider mix of home ownership products available on site (e.g. a mix of shared ownership and First Homes units). It would be more appropriate for the local planning authority to determine the appropriate percentage of First Homes on the site in order to reflect local household income levels and market value. This would ensure, where appropriate, that other affordable home ownership tenures are also delivered on site if these will be more affordable to local households. This is particularly pertinent with the

proposed introduction of a minimum shared ownership acquisition of 10% (reduced from 25%) in the Affordable Homes Programme which will reduce entry level costs for this tenure and make it cheaper than First Homes in many locations.

To summarise, within the overall percentage of affordable home ownership that the authority is seeking on site, it should have the flexibility to determine what product (or mix of products) best meet that need locally.

*Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to this First Homes requirement?*

*Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.*

*Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.*

The existing exemptions (as set down in Paragraph 64 of the NPPF) should apply to First Homes as well. The affordable housing tenure mix set down in local planning policy reflects local needs and is intended to provide the appropriate balance of tenures to meet that need. First Homes is a homeownership product and should therefore replace other homeownership products within the overall tenure mix. The proportion of affordable rents and/or social rented units should be unaffected.

*Q13: Do you agree with the proposed approach to different levels of discount?*

The Council agrees that the local authority should have the option to seek a higher discount than 30%. However, the proposal that First Homes should be funded from Section 106 contributions and/or the proposed new infrastructure levy means that many authorities are likely to be reluctant to set higher discounts as this will require greater subsidy that diverts funding from other competing demands.

*Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?*

There would need to be clear guidance of (i) what constitutes a “small” proportion (with a maximum percentage set for the level of market housing on site) and (ii) how a developer would be required to clearly evidence that it was not otherwise viable to deliver the entry level scheme. Otherwise, developers will always push to maximise their return, and there is a real danger that some developers will push to maximise the number of market homes on site in order to achieve more profit.

*Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?*

No. Simply saying that a site should be proportionate in size to the existing settlement is too open to interpretation and challenge, with some developers potentially appealing against the local planning

authority where the latter feels that a site would be too big. Having a site size threshold gives clarity to all parties.

*Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas?*

Yes. Rural exception schemes will normally seek to deliver a range of affordable housing tenures that clearly meet local needs and household income levels. They are specifically tailored to local circumstances (normally underpinned to local needs surveys and research) so it would not be appropriate to impose the First Homes model on these schemes as it may not match the identified needs.

### **Supporting small and medium-sized developers**

#### **Consultation Qs 17-23:**

*Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?*

*Q19: Do you agree with the proposed approach to the site size threshold?*

*Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?*

*Q21: Do you agree with the proposed approach to minimising threshold effects?*

The Council does not support temporary change. The consultation reports that it would expect to see a reduction of between 7% to 14% in affordable housing delivery if the threshold was increased to 40 and 10% to 20% if it is increased to 50. However, this impact would not be uniform across the country and the paper does not provide any detail of the localised impacts of this reduction. For some authorities (especially in less urban locations) small sites play a key role in securing much needed local affordable housing under Section 106 agreements. The proposed increase in site thresholds would have a disproportionate effect on these areas and significantly reduce affordable housing delivery (including the First Homes scheme). This would have knock-on impacts on housing waiting list times and homelessness in these areas, with homeless households facing longer periods in temporary accommodation due to the reduction in affordable housing coming forward.

There would also be a wider impact on land-led affordable housing schemes being delivered by registered providers and local authorities. Increasing the site thresholds will, in turn, increase the price of the sites concerned as there is no longer an affordable housing requirement attached to any development. Therefore, social housing providers are more likely to find themselves priced out of acquiring small to medium size sites and this will reduce their ability to deliver new affordable housing developments (particularly in locations where there is a focus on small scale infill developments or small edge of town sites).

In addition, the measure is being promoted as helping SME developers. However, there is no evidence put forward to indicate that these developers will come forward to acquire sites if the threshold is raised and no measures that would prevent larger scale developers simply buying up these sites.

*Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?*

The Government's proposed approach to setting thresholds in rural areas should remain.

### **Extending the current Permission in Principle to major development.**

#### **Consultation Qs 24-34**

*Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?*

No objections in principle.

*Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)?*

The consultation states that the Government does "not believe it is necessary to limit the amount of commercial floorspace as it will still be the case that Permission in Principle should only be granted for development that is housing-led." However, what defines "housing-led"? This is vague and open to differing interpretations by the LPA and developers. If the limit on commercial floorspace is to be removed, a firm definition or guidance must be available, explaining what is meant by "housing-led".

*Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?*

No objection in principle.

*Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.*

The relevant matters which should be assessed by a local planning authority in a PiP application are location, land use and the amount of development. The Government is considering adding a height parameter in terms of the number of storeys, as an additional matter to be assessed, given the potentially larger scale developments that PiP could be used for. This would provide greater clarity to the applicant and local planning authority about the scale of housing development that is acceptable for the site although it would add to the complexity of the determination of the application. In addition, it would start to bring design issues into the PiP process as well as result in a need to identify zones within a site with differing height parameters, perhaps diluting the original aims and objectives of the PiP process itself.

*Q28: Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:*



- i) *required to publish a notice in a local newspaper?*
- ii) *subject to a general requirement to publicise the application or*
- iii) *both?*
- iv) *disagree*

As larger developments are proposed to fall within the scope of PiP on application, the Government is keen to increase the extent of publicity of such applications in order to give the public a greater opportunity to comment, whilst still keeping to the speedier decision-making process. No mention is made of introducing neighbour notification, notwithstanding the very significant increase in the scale of development that can be granted in PiP. Given the larger scale of development that would be subject to PiP, consultation is important to maintain local democracy and ideally applications should be (iii) subject to both forms of publicity. However, this is difficult to achieve when the application process is set at a shorter time frame. In order to achieve effective publicity, major developments put forward through a PiP must be subject to a longer assessment and determination period: a minimum of ten weeks.

*Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?*

*Q30: What level of flat fee do you consider appropriate, and why?*

No comments.

*Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.*

Brownfield Land Registers (BLRs) are divided into two parts:

- Part 1 contains a list of brownfield sites that are considered appropriate for residential development; and
- Part 2 consists of sites which have been taken forward from Part 1 of the register and granted automatic Permission in Principle by the local planning authority (following consultation).

The Government is also consulting on whether all PiP by application “consents” that are on brownfield land should also be automatically recorded in Part 2 of the BLR. This is linked to the publication of a national brownfield map that will show all brownfield sites that are suitable for housing. Including permission in principle achieved via application in Part 2 will ensure they are captured on the map. According to the Regulations, sites in Part 1 of the BLR must be included in Part 2, if the local planning authority has “decided to allocate the land for residential development”; no indication is given of any suggested decision-making procedure. The actions of a developer or owner(s) can lead to inclusion of a site in Part 1 of the BLR, but not in Part 2 - and there is no mention of any mechanism, or right of appeal that can “force” an LPA to consider the merits of

including a site in Part 2, and thus grant it PiP. It is a little surprising that measures increase PiP by BLR are not part of the consultation proposals.

*Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle?*

More guidance on the scope of matters allowed to be assessed under PiP applications would be welcome, as different authorities currently assess these applications with differing amounts of detail. For example, “location” is one aspect that can be considered. But does this relate all locational aspects, including relationship with other buildings, impact on amenity of neighbouring land uses, etc? Similarly, when assessing “amount of development”, this is a vague concept and open to interpretation.

*Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?*

*Q34: To what extent do you consider landowners and developers are likely to use the proposed measure?*

In terms of the costs and benefits and the take-up of a wider PiP regime, the Council considers that it is unlikely to be taken up widely by developers, based on previous experience. The PiP procedure has not been widely used thus far by developers, and we have only received around 25 PiP applications across the whole of Buckinghamshire since the procedure was introduced in 2018. If the provision is to be increasingly used, the Council would suggest that the charging of a fee would be appropriate to ensure costs are covered.

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# BUCKINGHAM TOWN COUNCIL

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Appendix F



## Planning White Paper – Planning for the future – consultation response

page	Question	Response
23	<b>1.</b> What three words do you associate most with the planning system in England?	Developer-friendly Not local enough Transparent
23	<b>2.</b> Do you get involved with planning decisions in your local area?	Yes
23	<b>3.</b> 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?	(No they won't- your proposals are anti-community involvement. This is not a question). Plans should be widely published – on street furniture adjacent to the site, via local papers, social media and council minutes/ websites etc. – the current system works, don't change it
23	<b>4.</b> What are your top three priorities for planning in your local area?	Local decisions, local design and local levies directed by Neighbourhood and Local Plan of which at least 25% goes to the most local council (i.e. town and parish councils where in place).
25	<b>5.</b> Do you agree that Local Plans should be simplified in line with our proposals?	No - the proposed system is even more centralised; more not less local control is required. Local plans need to be wide-reaching, inclusive and recognise all the factors which affect the local area in which they are situated so they match the needs of the area against the needs of the developer and therefore provide the social housing infra-structure based upon the Local Plan policies and Neighbourhood Plans drawn up by Town & Parish Councils
26	<b>6.</b> Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?	No. There is not enough consideration given to local people having an influence in the planning process effectively and democratically. If local input is removed from the process a situation can develop where the developer will dictate the result at the expense of local people.
27	<b>7(a).</b> Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of "sustainable development", which would include consideration of environmental impact?	No – we are facing a climate emergency - 'consideration' is far, far too weak. Zero carbon should be built in to any revision of planning guidelines. Sustainability is everything as we are facing global climate change
27	<b>7(b).</b> How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?	Proper regional structures with democratic accountability, widespread consultation & engagement
29	<b>8(a).</b> Do you agree that a standard method for establishing housing requirements	No. Planning should be about locality. The proposals effectively nationalise planning and demote local democracy



@BuckinghamTC

Twinned with Mouvaux, France;



Neukirchen Vluyn, Germany



page	Question	Response
	(that takes into account constraints) should be introduced?	and community opinion to becoming sideshows. Every locale has different needs, different standards. Leave it local.
29	<b>8(b).</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. Local market need should be the indicator, with affordable housing and starter homes a priority, measured by house price inflation and numbers on social housing waiting lists (for example). The housing needs to be affordable rent and social rent and not affordable-to-buy
31	<b>9(a).</b> Do you agree that there should be automatic outline permission for areas for substantial development (areas) with faster routes for detailed consent?	No. Local authorities (not just the LPA but towns and parishes) must be involved throughout the planning process for each and every development. Haste will lead to a rash of developer led housing estates that will be the source of social problems for decades to come. Fast-track permission is undemocratic and should never be considered.
31	<b>9(b).</b> Do you agree with our proposals above for the consent arrangements for <i>Renewal and Protected</i> areas?	No - 'consent' appears to have been re-interpreted to mean 'imposition without accountability'
31	<b>9(c).</b> Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?	Not without local involvement; this just sounds like a nice way of describing over-centralised policies.
32/ 33	<b>10.</b> Do you agree with our proposals to make decision-making faster and more certain?	Decision-making faster – <b>Yes</b> . The White Paper proposals <b>No</b> . That's the way mistakes are made and cutting out local people from decision-making is undemocratic; all decisions should be made through statutory planning authorities and elected members
34	<b>11.</b> Do you agree with our proposals for accessible, web-based Local Plans?	Yes, however there must be an alternative means to access plans. Accessibility is good, - but not at the expense of local democracy
36	<b>12.</b> Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?	<b>Yes</b> when updating an existing LDP, but <b>No</b> when it is an entirely new plan. It is far too short a period to write such a massive document after extensive consultation, and then a referendum. The White Paper proposes a top down piece of legislation with no recognition of local people/local need/the environment/ social housing/infrastructure and cuts out any role for planning authorities and parish and town councils
36	<b>13(a).</b> Do you agree that Neighbourhood Plans should be retained in the reformed planning system?	Yes. This is what the Government pledged at the last general election. However, only if they have meaning and power; they need to retain legal weight. Currently under these proposals they are being neutered even more than they currently are. All indications from these proposals suggest that the intention is to undermine local influence.
36	<b>13(b).</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?	Design must continue to be by local people for their locality. Digital tools may be great for planning experts, but not for lay residents. They can be improved by including local elected members in the production of the digital format and good legislation supporting the plans against unwelcome erosion by development proposals of a predatory nature distorting the

page	Question	Response
		intentions or scope of a neighbourhood plan. The carrot of 25% of infrastructure funding going directly to local councils with a Neighbourhood Plan in place should remain.
37	<b>14.</b> Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?	No. Speed is not conducive to quality of design or build.
38	<b>15.</b> What do you think about the design of new development that has happened recently in your area?	Poorly-designed and too conservative. Developers use ‘off-the-shelf’ book designs without considering the local vernacular and location, although where a town or parish has worked with a developer from the pre-application stage, there have been excellent results. But where it has been presented with a design fait-accomplis, it can result in the opposite. Much is based around what the marketing departments think will sell - little imagination and fresh thinking - too little zero carbon inbuilding - not enough thinking about lifetime housing - insufficient social housing...Consultation all the way through is essential
38	<b>16.</b> Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?	Our priority is housing and town infrastructure developments that actually tackle climate change head on. Which means transport (less reliance on cars), solar energy, water conservation, as well more green and open spaces with more trees, energy efficiency of new buildings, good use of natural light.
40	<b>17.</b> Do you agree with our proposals for improving the production and use of design guides and codes?	No, a national one-size-fits-all standard will not do – and defeats the idea. Keep them local.
41	<b>18.</b> 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 and no. Local authorities already have planning officers, it is their job to work with towns and parishes to reach consensus on each application. What would such a Chief Officer do within the over centralised planning codes you are proposing? Local Authorities should be free to identify the officer roles they need to carry out their functions in their local context.
41	<b>19.</b> Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?	No. Design is already paramount. And ‘greater emphasis’ sounds very mealy-mouthed.
43	<b>20.</b> Do you agree with our proposals for implementing a fast-track for beauty?	A ridiculous question – what and who defines beauty? Totally unworkable.
48	<b>21.</b> When new development happens in your area, what is your priority for what comes with it?	That it complies with the (local) Neighbourhood Plan, that it references the local design guide, that it has sufficient affordable housing content (preferably social housing) and starter homes, that it will be as close to carbon neutral as possible, with less reliance on the car, and that it has a community infrastructure of schools, community centre, health centre, primarily paid for by the development levy

page	Question	Response
50	<b>22(a).</b> 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?	No - CIL needs to remain - and be improved so that councils of all tiers can exercise democratic control of local parallel developments, and the funds ring-fenced for the benefit of the community in which it is raised. Otherwise there is a risk it will be diverted to other projects to the detriment of the local amenities. CIL should be made mandatory for all areas.
50	<b>22(b).</b> Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?	This is an assumptive question. It presumes the implementation of an Infrastructure Levy. CIL is better, and should be set locally, possibly within a framework of national guidelines.
50	<b>22(c).</b> 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?	This is an assumptive question. It presumes the implementation of an Infrastructure Levy. Infrastructure levy should be based upon local plans and should seek to capture as much funding as possible
50	<b>22(d).</b> Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?	This is an assumptive question. It presumes the implementation of an Infrastructure Levy.  No, why should we bankroll developers until they claim they can afford it; judging from their annual returns they are extremely profitable. They have built up land banks and are land-wealthy, they can sell sites off if they're not planning to build on them. We are still suffering legacy costs from the 1980s and 1990s developers who declared themselves bankrupt as soon as they had sold the last house and defaulted on maintenance and other payments due, leaving the Local Authority to pick up the bills
51	<b>23.</b> Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?	All developments above a certain threshold (eg above six or more dwellings) should contribute towards appropriate and necessary local infrastructure improvement
52/ 53	<b>24(a).</b> 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?	No, more is required from developers. And not just affordable housing at least 35%, preferably 40%, but social housing too. There is a vast difference between affordable housing and social rent and any development should be based on local social need as a priority against 'affordable' as this is often not actually affordable in this country
52/ 53	<b>24(b).</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?	No, they are separate issues. Affordable housing is one thing, CIL/Infrastructure Levy is totally another. Also, affordable housing should only be delivered in the area in which the development is taking place and not elsewhere or this will break down the link between people and place and damage family support structures.
52/ 53	<b>24(c).</b> If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?	No, it's swings and roundabouts; the important thing is that it yields the most affordable housing that is integrated with market priced (unaffordable?) housing



page	Question	Response
52/ 53	<b>24(d)</b> . If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?	Yes, to ensure that it remains a local democratic process. Furthermore social housing should be the term used, not affordable housing, as affordable housing is not affordable for many.
53	<b>25</b> . Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?	No, more. For instance, a LPA should not use CIL/Infrastructure Levy to subsidise council tax, or for projects outside the community in which it was raised
53	<b>25(a)</b> . If yes, should an affordable housing 'ring-fence' be developed?	Yes, affordable housing should be ring-fenced but should be renamed social housing as affordable is not actually affordable - at what point will Parliament realise this and stop using the wrong terminology and mis-informing us about their intentions. Social housing should lead in any development and settlement within any agreement based upon local plans
59/ 60	<b>26</b> . 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?	<p>Yes - the needs of lone parent families (mostly led by women), people with disabilities, whole life housing that accommodates all age needs combined with the dangers of creating ghettoised communities all need to be examined carefully against the protected characteristics of the Equality Act 2010.</p> <p>What public consultation has been undertaken to support the principle of the change in legislation as it was not in the manifesto of the government at the time of its election in 2019? Therefore on what basis is the government bringing forward this proposal, as it has not been consulted through an electoral consultation or through local consultations via the planning hierarchy as far down as town and parish councils.</p>

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