

**Sevenoaks Town Council
Notes of the (Virtual) Meeting held on Wednesday 2nd September 2020
To consider the Government’s Consultation Document on
Proposed Changes to Planning System**

Cllr K Bonin	Present		Cllr N Busvine OBE, Mayor	Present
Cllr S Camp, Chairman	Present		Cllr Dr M Canet	Apologies
Cllr A Clayton	Present		Cllr A Eyre	Present
Cllr V Granville Baxter	Present		Cllr R Hogarth	Absent
Cllr L Michaelides	Present		Cllr T Morris Brown	Absent
Cllr Mrs R Parry	Present		Cllr R Parry	Present
Cllr R Piper, Vice Chairman	Present		Cllr S Raikes	Present
Cllr C Shea	Absent		Cllr E Waite	Apologies

In Attendance: Town Clerk and Deputy Town Clerk

Meeting Commenced: 7.00 p.m.

Meeting Concluded: 8.30pm

165. Declarations of Interest

No Declarations of Interest were made.

166. Government Consultation: Changes to the Current Planning System

Committee members received and considered the Ministry of Housing, Communities and Local Government consultation to the current planning system and discussed responses to the survey responses.

Councillors thanked Cllr Piper for his contribution in preparing initial responses.

RESOLVED: To forward the current responses:

Please note information below is using the Consultation Paper’s question numbering.

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? (p.14)

Disagree

The opportunity has been missed to amend the formula to take into account the constraints of places like the Sevenoaks district area and the ultimate impact on Sevenoaks Town because of the surrounding Green Belt. In particular the Green Belt is the second highest in the country and the 7% urban land has largely been used up over the past 70 years (The current ONS based formula gives 700 new homes a year –the 0.5% gives 225 a year—so no help .)

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 (p.14)

Disagree.

Whilst a turnover of stock over 200 years is reasonable, the comments in 1 above still applies to the formula

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. (p 16)

Disagree.

Most areas in South East England have 3 employment markets—those that work locally, those that work outside the area, and a commuter hub. Most people work outside the Sevenoaks district and these wider employment sites—in Surrey, Essex and greater London – finance local house prices. This is particularly true of Sevenoaks town where central London incomes, particularly from the financial sector, are dictating prices. There is a very diverse range of salaries between the city salaries and local salaries and an ‘overarching supply and demand’ policy would be very hard to achieve as the area is a magnet for commuters. Housing need is best agreed locally using local policies included in the Neighbourhood Development Plan and agreed by local authorities.

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. (p 16)

Disagree

Affordability will include a reaction to the local constraints, which in Sevenoaks District is the rigidity of the 93% Green Belt and the struggle for affordable housing.

Q5 Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why. (p. 16)

Disagree

The affordability weighting needs to recognise that some constraints, like the Green Belt, are rigid and can only increase supply at the margin

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? (p.17)

Disagree

6 months is a very short period to consider and react to the comments made in the second stage of the consultation. 12 months would be more practical.

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? If not, please explain why. Are there particular circumstances which need to be catered for? (p.17)

Disagree

–as per Q6

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? Please provide reasons and / or evidence for your views (if possible) (p.21)

Negotiation between a LA and developer –as the need for Affordable Homes mix depends on the local Housing Register, which changes materially over time tailored to local needs.

Q9 Should the existing exemptions form the requirement for affordable home ownership products (e.g. for build to rent) also apply to this First Homes requirement? (p.22)

No –the need for Affordable Housing and Social Housing should have priority over market rental schemes

Q10 Are any existing exemptions not required? If not, please set out which exemptions and why. (p.22)

No. Disagree as distort markets

Q11 Are any other exemptions needed? If so, please provide reasons and / or evidence for your views. (p.22)

Disagree

Exemptions should not be extended as they tend to distort markets. Reference should be included to 'Social Housing'.

Q 12 Do you agree with the proposed approach to transitional arrangements set out above? (p.22)

Agree

Q 13 Do you agree with the proposed approach to different levels of discount? (p.22)

Agree.

Developers need clarity. Practical local experience has shown when Sevenoaks Town Council were wanting to build First Homes / Affordable Homes on its land the CIL contributions made it economically unviable.

At present Town and Parish Councils are receiving CIL contributions as a 'right' rather than at the discretion of the Planning Authority as used to be the case in s.106 agreements, this works far better for local communities and should continue.

Q 14 Do you agree with the approach allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability? (p.23)

Agree

It increases the likelihood of the scheme being built and provides a better social mix

Q 15 Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework? (p.23)

Disagree.

Should not be arbitrary and should be set by local authorities based on local conditions

Q 16 Do you agree that the First Homes exception sites policy should not apply in designated rural areas? (p.23)

Agree

Q 17 Do you agree with the proposed approach to raise the small sites threshold for a time limited period? (p.27)

No

Many sites in Sevenoaks town are small and sell at a premium and it is appropriate that they contribute to AH—as there are 700 on SDC’s Housing Register. This would be particularly damaging to Sevenoaks as high proportion will be infill. This should be down to local authorities and include policies in the Neighbourhood Development Plan.

Q 18 What is the appropriate level of small sites threshold? (p.27)

Other

Historically a maximum of 5 has worked in this area. 40 – 50 would be a huge development within Sevenoaks town.

Q 19 Do you agree with the proposed approach to the site size threshold? (p.27)

Disagree

The area is 93% Green Belt and many/most sites are small. However, the Town Council through the Neighbourhood Development Plan has identified a potential site for up to 800 homes and new leisure facilities.

Q 20 Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months? (p.27)

No

It is imperative that this is not adopted and imposed as the transition may become permanent and different parts of the country may develop at different rates

Q 21 Do you agree with the proposed approach to minimising threshold effects? (p.27)

Agree.

As identified in Local Development Plan and Neighbourhood Development Plan

Q 22 Do you agree with the Government's proposed approach to setting thresholds in rural areas? (p.28)

Agree

If it is good enough for rural areas, it should be good enough for urban areas with local authority involvement and use of Neighbourhood Development Plan

Q 23 Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period? (p.28)

More apprenticeship schemes –encourage modular homes. The reinstatement of outline planning to avoid unnecessary resources being wasted. Offsite construction reduces building time considerably and is cost effective. Greater collaboration between housing associations and developers be encouraged. More emphasis on Neighbourhood Development Plan.

Q 24 Do you agree that the new Permission in Principle should remove the restriction on major development? (p.31)

Disagree

Unless regulations re truly habitable room sizes, insulation, access to light and ventilation, charging points, lifetime homes, access etc are significantly strengthened –to avoid the recent problems of permitted development . And that design principles are at least equivalent of the London Design Guidance and standards as per Neighbourhood Development Plan.

Q 25 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)? Please provide any comments in support of your views. (p.31)

No

Height and mass should be in line with neighbouring homes and design standard to be in keeping with Neighbourhood Development Plan

Q 26 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? (p.33)

No

see Q24 answer above. With minimal oversight it is important to avoid instant sub-standard accommodation

Q 27 Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views (p.33)

Yes

Taller building should be limited to town centres and not scattered throughout neighbourhood or suburban areas.

Q 28 Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? (p.33)

Agree

Subject to a general requirement to publicise the application, including by social media and vital to retain consultation with parish councils and local community

Q 29 Do you agree with our proposal for a banded fee structure based on a flat fee per hectare with a maximum fee cap?

Agree.

Fee to be set locally by local authorities to recover reasonable costs subject to periodic revision and local need. Adjusted Planning fees could help with areas in need of regeneration

Q 30 What level of flat fee do you consider appropriate, and why? (p.34)

Agree

Fee to be set locally to recover reasonable costs

Q 31 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. (p.35)

Agree

Q 32 What Guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders. (p.35)

Regulations should be strengthened as in Q24 to give confidence to the public and developers that the proposals are appropriate and supportable. Neighbourhood Plans should be used to encourage confidence.

Q 33 What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome? (p.36)

Please see answers to Q 24 and 32. It is vital to work with the local community to gain trust and confidence in the process so it is sustainable and local communities can shape their locality in a stable and sustainable way. They need to reflect the policies supported in the Local Neighbourhood Plan. Local communities' benefit and appreciate their local community beauty environment.

Q 34 To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible. (p.36)

There is a concern from the professional community including architects that the proposed measures could downgrade build quality and produce identikit developments. Policies within local Neighbourhood Development Plan with use of Design Panels will ensure high quality of design and construction within 'local character' bearing in mind that local beauty is important for the community.

Q 35 In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty? (p.37)

The proposals support First Homes but do nothing for disabled people and Lifetime Homes and do nothing to promote local needs mix of housing by encouraging, say, downsizing, to free up larger homes for families. Lifetime homes could make better use of housing stock.