



# WOODBIDGE TOWN COUNCIL

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## TO MEMBERS OF THE PLANNING COMMITTEE

Cllr Bale

Cllr Lady Blois

Cllr Holdcroft

Cllr Mapey

Cllr Miller

Cllr O'Nolan

Cllr Sanders

Cllr Sutton

Cllr Walsh

You are hereby summoned to attend the **MEETING** of the **PLANNING COMMITTEE** to be held **virtually** on: **THURSDAY 15<sup>TH</sup> OCTOBER 2020 at 6PM**

Greg Diaper

Locum Town Clerk

9<sup>th</sup> October 2020

### **Public Attendance**

*Members of the public and press are welcome to join the Zoom meeting. Members of the public will be invited to give their views/questions the Town Council on issues on the agenda, or raise issues for consideration or inclusion at future meetings. This item will be limited to 30 minutes duration but may be extended at the discretion of the Mayor. The Zoom login details are provided below;*

<https://us02web.zoom.us/j/89783748586?pwd=QjBhR2d2M0o5T2hINFhucFpJMG16Zz09>

**Meeting ID: 897 8374 8586**

**Passcode: 495867**

## AGENDA

### 1. APOLOGIES

To receive apologies for absence.

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## **2. DECLARATION OF INTEREST**

Members and officers are invited to make any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the meeting if it becomes apparent that this may be required when a particular item or issue is considered.

## **3. REQUESTS FOR DISPENSATION**

Councillors with a Pecuniary Interest in an item on this Agenda, who wish to remain, speak, and/or vote during consideration of that item, may apply for a dispensation in writing to the Town Clerk prior to the meeting. Applications may also be considered at the meeting itself should the nature of the interest become apparent to a Councillor at the time of the meeting.

## **4. CONFIRMATION OF PLANNING COMMITTEE MINUTES**

To confirm the minutes of the Planning Committee held on Tuesday 6<sup>th</sup> September 2020.

## **5. PUBLIC QUESTION TIME**

For the public to ask questions of the Council or raise issues for consideration at a future meeting of the Council. 15 minutes maximum.

## **6. TO FURTHER COMMENT ON THE PROPOSED CHANGES TO THE PLANNING SYSTEM – ATTACHED**

To comment on the proposed changes to the Planning System –

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

## **7. CLOSURE**

## WOODBRIIDGE TOWN COUNCIL

Minutes of an **on-line** meeting of the **PLANNING COMMITTEE** held on **TUESDAY 6<sup>TH</sup> OCTOBER 2020**  
at **6pm**

### Councillors:

Present: S Bale, Lady C Blois, G Holdcroft, E O’Nolan, R Sanders, R Sutton and C Walsh

Apologies: S Miller

Absence without  
Apologies: C Mapey

In Attendance: Locum Town Clerk, Locum Deputy Town Clerk and two members of the public

*In the absence of the Chair, Councillor Sanders took the Chair.*

*Action*

#### 438. APOLOGIES FOR ABSENCE

Apologies for absence had been received from Councillor Miller.

#### 439. MEMBERS AND OFFICERS WERE INVITED TO MAKE ANY DECLARATIONS OF DISCLOSABLE PECUNIARY OR LOCAL NON-PECUNIARY INTERESTS THAT THEY MAY HAVE IN RELATION TO ITEMS ON THE AGENDA AND WERE ALSO REMINDED TO MAKE ANY DECLARATIONS AT ANY STAGE DURING THE MEETING IF IT BECOMES APPARENT THAT THIS MAY BE REQUIRED WHEN A PARTICULAR ITEM OR ISSUE IS CONSIDERED, AND TO DEAL WITH DISPENSATIONS AS REQUESTED BY INDIVIDUAL COUNCILLORS IN LINE WITH S33 OF THE LOCALISM ACT 2011

Councillor Holdcroft declared a local non-pecuniary interest in item 443 planning application DC/3606/TCA as a Trustee of the Seckford Foundation.

No other members declared an interest in matters on the agenda.

#### 440. COUNCILLORS WITH A PECUNIARY INTEREST IN AN ITEM ON THIS AGENDA, WHO WISH TO REMAIN, SPEAK AND/OR VOTE DURING CONSIDERATION OF THAT ITEM, MAY APPLY FOR A DISPENSATION BY WRITING TO THE TOWN CLERK PRIOR TO THE MEETING. APPLICATIONS MAY ALSO BE CONSIDERED AT THE MEETING ITSELF SHOULD THE NATURE OF THE INTEREST BECOME APPARENT TO A COUNCILLOR AT THE TIME OF THE MEETING

There were no requests from Councillors with a Pecuniary Interest in an item on this Agenda for a dispensation.

**441. PUBLIC QUESTION TIME**

Two members of the public spoke in opposition to planning application DC/20/3685/FUL for Gault House, 3A Thoroughfare, because of the degree of overlooking to neighbouring properties, and the increased roof height of this application.

*With the agreement of the Committee the Chair dealt with that planning application as the next item of business (agenda item 6 and item 443).*

**TO CONSIDER APPLICATION FOR PLANNING PERMISSION**

Application No and Address	Committee Comments
DC/20/3685/FUL Gault House, 3A Thoroughfare	We recommend REFUSAL as the design is contrary to planning policy SCLP11.2 in that it will affect the privacy of neighbouring properties by way of overlooking from first floor windows, and that the positioning of the dwelling within the site, combined with its height, dominates its relationship with neighbouring properties. In particular the first-floor windows overlooking properties in Church Street and The Coach House, New Street. The application is also contrary to planning policy 11.5 in terms of its scale and height within the conservation area and its neighbouring properties.

**442. TO AGREE AND APPROVE THE MINUTES OF THE PLANNING COMMITTEE MEETING HELD 22<sup>nd</sup> SEPTEMBER 2020**

The Committee agreed and approved the signing of the minutes of the Planning Committee meeting held 22<sup>nd</sup> September 2020 as a true record.

**443. TO CONSIDER APPLICATIONS FOR PLANNING PERMISSION**

Application No and Address	Committee Comments
DC/20/3606/TCA Woodbridge School, Burkitt Road	We recommend APPROVAL
DC/20/2726/LBC The Crown Hotel, 2 Thoroughfare	We recommend APPROVAL
DC/20/2725/FUL The Crown Hotel, 2 Thoroughfare	We recommend APPROVAL
DC/20/3716/TCA Ivy Lodge, 1 Doric Place	We recommend REFUSAL. The Crab Apple is at the edge of the garden and has not outgrown its space, and the Sorbus could be trimmed whilst still being retained as a healthy tree.
DC/20/3709/FUL 20 Queens Drive	We recommend APPROVAL
DC/20/3711/FUL 11 Queens Drive	We recommend APPROVAL
DC/20/3688/LBC 66 New Street	We recommend APPROVAL
DC/20/3687/FUL 66 New Street	We recommend APPROVAL
DC/20/3776/TCA Quay Church, Quay Street	We recommend APPROVAL
DC/20/3758/TCA 8 Pytches Road	We recommend APPROVAL

**444. TO NOTE EAST SUFFOLK COUNCIL DECISIONS ON PLANNING APPLICATIONS WHERE THOSE DECISIONS ARE CONTRARY TO THIS COUNCIL'S RECOMMENDATIONS MADE ON 8<sup>th</sup> SEPTEMBER**

The Committee noted that there were no East Suffolk Council decisions on planning applications where those decisions were contrary to this Council's recommendations made on 8<sup>th</sup> September.

**445. TO FURTHER COMMENT ON THE PROPOSED CHANGES TO THE PLANNING SYSTEM**

It was agreed to defer this item to a separate meeting at a date to be arranged.

**446. CLOSURE**

The meeting was closed at 7.08pm.

Councillor Sanders  
Vice-Chair

## ITEM 6

### TO FURTHER COMMENT ON THE PROPOSED CHANGES TO THE PLANNING SYSTEM

As Members have realised this is a lengthy document on which to comment.

Here is recommended comment on a few more sections:-

**Question 7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?**

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

This would consider whether the plan contributes to achieving sustainable development in accordance with policy issued by the Secretary of State. The achievement of sustainable development is an existing and well-understood basis for the planning system, and the Government proposes that it should be retained.

However, they are proposing to:

- abolish the Sustainability Appraisal system and develop a simplified process for assessing the environmental impact of plans, which would continue to satisfy the requirements of UK and international law and treaties
- remove the Duty to Cooperate test (although further consideration will be given to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared in areas with significant strategic challenges); and
- introduce a slimmed down assessment of deliverability for the plan which would be incorporated into the “sustainable development” test.

This would appear to be an attempt to reduce the detailed consideration of the impact of development on the environment and people’s health. When there is growing, and well-founded, anxiety about the impact of climate change, and long-established evidence of the impact of inappropriate development on health, simplifying the assessment should be resisted.

Slipped within this section is the proposal to remove the duty to co-operate. At present there is cross-border co-operation in local plans, which is why the authorities around and including Ipswich have agreed to ensure that collectively the total number of new homes are provided even if they are not all built where originally planned. We must recognise that Government plans to create more unitary authorities might in turn reduce the degree of co-operation required between authorities, but it is still necessary.

Proposed Response: -

7(a) Disagree. The consideration of environmental impact should indeed be included, but strengthened, not simplified

7(b) In the absence of a Duty to co-operate, residents could have no way of being confident that the impact of a development “on the border” has been assessed by their authority

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

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

Debates about housing numbers tend to dominate the local plan process, and a standard method for setting housing requirements would significantly reduce the time it takes to establish the amount of land to release in each area. This has historically been a time-consuming process which ultimately has not led to enough land being released where it is most needed (as reflected by worsening affordability). A standard requirement would differ from the current system of local housing need in that it would be binding, and so drive greater land release.

It is proposed that the standard method would be a means of distributing the national housebuilding target of 300,000 new homes annually, and one million homes by the end of the Parliament, having regard to:

- the size of existing urban settlements (so that development is targeted at areas that can absorb the level of housing proposed);
- the relative affordability of places (so that the least affordable places where historic under-supply has been most chronic take a greater share of future development);
- the extent of land constraints in an area to ensure that the requirement figure takes into account the practical limitations that some areas might face, including the presence of designated areas of environmental and heritage value, the Green Belt and flood risk. For example, areas in National Parks are highly desirable and housing supply has not kept up with demand; however, the whole purpose of National Parks would be undermined by multiple large scale housing developments so a standard method should factor this in;
- the opportunities to better use existing brownfield land for housing, including through greater densification. The requirement figure will expect these opportunities to have been utilised fully before land constraints are taken into account;
- the need to make an allowance for land required for other (non-residential) development; and
- inclusion of an appropriate buffer to ensure enough land is provided to account for the drop off rate between permissions and completions as well as offering sufficient choice to the market.

The standard method would make it the responsibility of individual authorities to allocate land suitable for housing to meet the requirement, and they would continue to have choices about how to do so: for example through more effective use of existing residential land, greater

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densification, infilling and brownfield redevelopment, extensions to existing urban areas, or new settlements.

In this section the Government seems to be placing the blame for development land unavailability, and a corresponding increase in house prices, on local plans, without any reference to “land-banking” by developers. If all the land with extant planning approval was to be built upon, the 1 million homes promised by the end of this Parliament could be delivered without releasing any new land.

There is little correlation between house prices and land availability. If that was the sole determining factor homes with sea views would be equally priced with those without. Other factors – regional prosperity, commutability, crime rate, second-homers, rental market – determine house prices, together with developers creating an artificial shortage.

Forecasts indicate that rural shires will see an overall increase in the number of homes to be built under this new formula. COVID19 has been the catalyst for the greatest change in working patterns since industrialisation and created a market for homes with gardens. Should we wait until the full impact of this change can be assessed before we change the formula ?

**Proposed responses: -**

**8(a). There should be no change to the method of calculation until the full impact of COVID19 has been assessed?**

**8(b). We do not agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated. There is little correlation between house prices and land availability. If that was the sole determining factor homes with sea views would be equally priced with those without. Other factors – regional prosperity, commutability, crime rate, second-homers, rental market – determine house prices, together with developers creating an artificial shortage.**

**Question 9**

**(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?**

**(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?**

**(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?**

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

In areas suitable for substantial development (Growth areas) an outline permission for the principle of development would be conferred by adoption of the Local Plan. Further details would be agreed and full permission achieved through streamlined and faster consent routes which focus on securing good design and addressing site-specific technical issues. Detailed planning permission could be secured in one of three ways:

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- a reformed reserved matters process for agreeing the issues which remain outstanding;
- a Local Development Order prepared by the local planning authority for the development which could be prepared in parallel with the Local Plan and be linked to a master plan and design codes; or
- for exceptionally large sites such as a new town where there are often land assembly and planning challenges, we also want to explore whether a Development Consent Order under the Nationally Significant Infrastructure Projects regime could be an appropriate route to secure consents.

In areas suitable for development (Renewal areas), there would be a general presumption in favour of development established in legislation (achieved by strengthening the emphasis on taking a plan-led approach, with plans reflecting the general appropriateness of these areas for development). Consent for development would be granted in one of three ways:

- for pre-specified forms of development such as the redevelopment of certain building types, through a new permission route which gives an automatic consent if the scheme meets design and other prior approval requirements;
- for other types of development, a faster planning application process where a planning application for the development would be determined in the context of the Local Plan description, for what development the area or site is appropriate for, and with reference to the National Planning Policy Framework; or
- a Local or Neighbourhood Development Order

**Proposed responses: -**

**(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?**

No. There are concerns that the preparation of Local Development Orders proceeding in parallel with the local plan preparation, and local design guides will create overwhelming individual consultations for residents, and that there will be an inability on constrained planning departments to deliver quality plans.

Questions must also be asked about the need for speed in the planning process. Demand, particularly for housing, does not occur overnight. The last unexpected and unplanned increase in housing demand was 1974, with the influx of Ugandans fleeing, or being expelled by, Idi Amin. Population numbers can be forecast some time ahead, and even if driven by commercial development (new offices/factories or even a new commuter railway station) there is adequate time to process the detail of the development at a comfortable pace to keep up with demand.

**(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?**

No. The phrase “for pre-specified forms of development such as the redevelopment of certain building types” suggests a broad brush approach which isn’t suitable for each type of building being redeveloped.

(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

No. Residents feel even more isolated from the planning process when the Nationally Significant label is attached to developments, and whilst it might be nationally significant for there to be development of the size/scale proposed, the case for its precise location needs to be established on more than availability of land.

#### Question 10

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

For major development, beyond relevant drawings and plans, there should only be one key standardised planning statement of no more than 50 pages to justify the development proposals in relation to the Local Plan and National Planning Policy Framework.

In addition to the above there is the expectation that greater use will be and can be made of I.T., in the form of datasets to enable individuals to find relevant information speedily. There is no statement as to how this stepchange in I.T. will come about – is it to be Government-led (and in the UK we have a poor reputation with such projects) or is it reliant upon commercial developers ?

Proposed Response: -

We do not fully agree with the proposals to make decision-making faster and more certain as there is a lack of clarity about how the I.T. revolution will be achieved.

#### Question 11

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

To support open access to planning documents and improve public engagement in the planmaking process, plans should be fully digitised and web-based following agreed web standards rather than document based. This will allow for any updates to be published instantaneously and makes it easier to share across all parties and the wider public. Those digital plans should be carefully designed with the user in mind and to ensure inclusivity, so that they can be accessed in different formats, on different devices, and are accessible and understandable by all. Geospatial information associated with plans, such as sites and areas, should also be standardised and made openly available online.

Proposed Response: -

We support this proposal. This is 2020 and there is increasing expectation that information such as this should be online.

## Question 12

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

Under the current system, it regularly takes over a decade for development sites to go through the Local Plan process and receive outline permission. Under these proposals, this would be shortened to 30 months, although they expect many local authorities could do this in a shorter time and would encourage them to do so where this is practicable. They propose that the process covers five stages, with meaningful public engagement at two stages:

- Stage 1 [6 months]: The local planning authority “calls for” suggestions for areas under the three categories, including comprehensive “best in class” ways of achieving public involvement at this plan-shaping stage for where development should go and what it should look like.
- Stage 2 [12 months]: The local planning authority draws up its proposed Local Plan and produces any necessary evidence to inform and justify the plan. “Higher-risk” authorities will receive mandatory Planning Inspectorate advisory visits, in order to ensure the plan is on track prior to submission.
- Stage 3 [6 weeks]: The local planning authority simultaneously (i) submits the Plan to the Secretary of State for Examination together with a Statement of Reasons to explain why it has drawn up its plan as it has; and (ii) publicises the plan for the public to comment on. Comments seeking change must explain how the plan should be changed and why. Again, this process would embody ‘best in class’ ways of ensuring public involvement. Responses will have a word count limit.
- Stage 4 [9 months]: A planning inspector appointed by the Secretary of State considers whether the three categories shown in the proposed Local Plan are “sustainable” as per the statutory test and accompanying national guidance and makes binding changes which are necessary to satisfy the test. The plan-making authority and all those who submitted comments would have the right to be “heard” by the inspector (whether face to face, by video, phone or in writing –all at the inspector’s discretion). The inspector’s report can, as relevant, simply state agreement with the whole or parts of the council’s Statement of Reasons, and/or comments submitted by the public.
- Stage 5 [6 weeks]: Local Plan map, key and text are finalised, and come into force

Considering this 30 month timetable the opportunity for public involvement in the process is much reduced – a mere 6 months for public involvement at this plan-shaping stage for where development should go and what it should look like. Any public involvement further down the process is limited to a 6-week window of opportunity to comment on the plan. If the Government is really serious that local plans should have greater public engagement in their preparation, a mere 6 months to both decide sites and designs is not sufficient.

There is a further suggestion that local authorities be required to review their local plan every five years – this probably makes sense in this ever-changing environment.

**Proposed Response: -**

**We do not support the proposed 30-month timescale for the preparation of a local plan as it does not provide sufficient opportunity for the residents to engage with and contribute to the**

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process, and places too great a demand on the resources required to achieve meaningful engagement. We would however support a more frequent review of the local plan.

### Question 13

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

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

There remains some confusion as to the effectiveness of Neighbourhood Plans – legal challenges have questioned their place in the planning process. However, they remain an essential part of a community's arsenal in ensuring development is appropriate for the locality.

If neighbourhood plans are to meet the digital criteria expected by the Government some form of support – funding or access to free online services – will be required, particularly for the smaller Parishes.

**Proposed Response: -**

13(a) Yes

13(b) Some form of support – funding or access to free online services – will be required, particularly for the smaller Parishes.

### Question 14

Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?

Rt. Hon. Sir Oliver Letwin found in his Independent Review of Build Out Rates in 2018, the build out of large residential developments can be slow due to low market absorption rates, with some sites taking over 20 years to complete. To address this, we propose to make it clear in the revised National Planning Policy Framework that the masterplans and design codes for sites prepared for substantial development should seek to include a variety of development types by different builders which allow more phases to come forward together

The question is why do larger sites take so long to complete. It is a mixture of issues – not wanting to saturate the housing market (resulting in lower sales income), conditions imposed as part of the planning approval (when the 200<sup>th</sup> house is sold the access roadways/school/community facility must have been built/provided), a slump in demand, changes to approvals to increase the density/scale/height to maximise profit.

Would some form of levy on unbuilt plots be appropriate – a sort of Council Tax on unbuilt properties. This might simply increase house prices. Or perhaps the removal planning approval of the unbuilt proportion of the site after 5 years from it being granted. Sir Letwin suggested that no one developer should be engaged on large sites but how can that be imposed by the planning system ?

Proposed Response: -

We would welcome a speedier completion of largescale developments in order to reduce the impact of continued construction, but recognise that any measures to do so will be resisted by developers as they will result in market saturation and a consequential lowering of the housing market locally.

15. What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/ or poorly-designed / There hasn't been any / Other – please specify]

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

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

As national guidance, we will expect the National Design Guide, National Model Design Code and the revised Manual for Streets to have a direct bearing on the design of new communities. But to ensure that schemes reflect the diverse character of our country, as well as what is provably popular locally, it is important that local guides and codes are prepared wherever possible. These play the vital role of translating the basic characteristics of good places into what works locally, and can already be brought forward in a number of ways: by local planning authorities to supplement and add a visual dimension to their Local Plans; through the work of neighbourhood planning groups; or by applicants in bringing forward proposals for significant new areas of development.

We propose that these different routes for bringing forward design guides and codes should remain, although in all cases it will be essential that they are prepared with effective inputs from the local community, considering empirical evidence of what is popular and characteristic in the local area. To underpin the importance of this, we intend to make clear that designs and codes should only be given weight in the planning process if they can demonstrate that this input has been secured. And, where this is the case, we will also make clear that decisions on design should be made in line with these documents. Where locally-produced guides and codes are not in place, we also propose to make clear in policy that the National Design Guide, National Model Design Code and Manual for Streets should guide decisions on the form of development.

These are well-intentioned ideals, but they fail to specify how the inputs from the local community will be judged “effective”, or how the input from the local community has been “demonstrated”.

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Proposed Response: -

In principle we agree with the aims and ambitions but would need to see greater clarity as to the degree and realism of what is judged “effective” input from the local community before we can support this proposal whole-heartedly

Question 18.

Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

The vision which we have set out will require a step-change in the design skills available to many local planning authorities, as well as the right prioritisation and leadership across the sector. We recognise that this will not happen overnight, and that authorities will need support.

We will explore the options for establishing a new expert body which can help authorities make effective use of design guidance and codes, as well as performing a wider monitoring and challenge role for the sector in building better places. Different models exist for how this could be taken forward - such as a new arms-length body reporting to Government, a new centre of expertise within Homes England, or reinforcing the existing network of architecture and design centres. Whatever model is adopted, we envisage that it would be able to draw on the expertise of recognised experts with a range of skills, drawn from across the built environment sector. Should the final proposals lead to the creation of new central government arm’s-length body, then the usual, separate government approval process would apply for such entities.

We will also bring forward proposals later this year for improving the resourcing of planning departments more broadly; and our suggestions in this paper for streamlining plan-making will allow some re-focusing of professional skills. However, effective leadership within authorities will also be crucial. To drive a strong vision for what each place aspires to, and ensure this is integrated across council functions, we believe that each authority should appoint a chief officer for design and place-making, as recommended by the Building Better, Building Beautiful Commission.

Proposed Response: -

The vision of a new central government arm’s-length body overseeing plan-making raises concerns and begs the question as to the future role of the Planning Inspectorate. Whilst increased funding for local authority planning departments is welcomed, it should not be concentrated on a chief officer post but spread to ensure that there are more planners overall and that there is greater employee retention than at present.

Question 19.

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

The Building Better, Building Beautiful Commission recommended that Homes England should attach sufficient value to design as well as price, and give greater weight to design quality in its work.

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The Government supports this recommendation and recognises that the work of Homes England is an important route through which we can lead by example. Homes England have already taken steps to champion design quality in their land disposals programme, through implementation of a design quality assessment approach, with a minimum standard which must be achieved for a proposal to progress.

However, we recognise that there is an opportunity to go further, and we will engage Homes England, as part of the forthcoming Spending Review process, to consider how its objectives might be strengthened to give greater weight to design quality, and assess how design quality and environmental standards can be more deeply embedded in all Homes England's activities and programmes of work.

**Proposed Response: -**

**Design in itself is worthy but greater consideration needs to be given to the implementation within the design of measures to enable "life-long" occupation, reduced energy and water consumption, and the provision of outside space.**

## **Question 20**

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

We propose to do this in three ways.

In the first instance, through updating the National Planning Policy Framework, we will make clear that schemes which comply with local design guides and codes have a positive advantage and greater certainty about their prospects of approval.

Second, where plans identify areas for significant development (Growth areas), we will legislate to require that a masterplan and site-specific code are agreed as a condition of the permission in principle which is granted through the plan. This should be in place prior to detailed proposals coming forward, to direct and expedite those detailed matters.

These masterplans and codes could be prepared by the local planning authority alongside or subsequent to preparing its plan, at a level of detail commensurate with the size of site and key principles to be established. For example, a set of simple 'co-ordinating codes' of the sort endorsed by the Building Better, Building Beautiful Commission could set some initial key parameters for the site layout. Where sites are expected to come forward in the near future, more developed masterplans or codes, prepared by the local planning authority or site promoter, will provide greater certainty.

Third, we also propose to legislate to widen and change the nature of permitted development, so that it enables popular and replicable forms of development to be approved easily and quickly, helping to support 'gentle intensification' of our towns and cities, but in accordance with important design principles. There is a long history – in this country and elsewhere – of 'pattern books' being used to articulate standard building types, options and associated rules (such as heights and set-backs). They have helped to deliver some of our most popular and

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successful places, and in a way which makes it relatively easy for smaller development companies to enter the market. We want to revive this tradition, in areas suitable for development (Renewal areas), by allowing the pre-approval of popular and replicable designs through permitted development. The benefits are much more than fast delivery of proven popular designs – it will foster innovation and support industrialisation of housebuilding, enabling modern methods of construction to be developed and deployed at scale.

To take this approach forward, we intend to develop a limited set of form-based development types that allow the redevelopment of existing residential buildings where the relevant conditions are satisfied – enabling increased densities while maintaining visual harmony in a range of common development settings (such as semi-detached suburban development). These would benefit from permitted development rights relating to the settings in which they apply. Prior approval from the local planning authority would still be needed for aspects of the design to ensure the development is right for its context (such as materials), as well as for other important planning considerations such as avoidance of flood risk and securing safe access. To enable further tailoring of these patterns to local character and preferences, we also propose that local planning authorities or neighbourhood planning groups would be able to use local orders to modify how the standard types apply in their areas, based on local evidence of what options are most popular with the wider public.

**Proposed Response: -**

In one breath the earlier proposals promote greater public involvement in the planning process, and now they talk of standardised designs, and, although not specifically addressed as such, off-site pre-fabricated panel construction. If the public are to be involved in the design process the 30month local plan process is too short.