**PLANNING FOR THE FUTURE WHITE PAPER CONSULTATION**

**White Paper August 2020**

**Chidham & Hambrook Parish Council**

Chidham & Hambrook comprises three communities, Chidham, Hambrook and Nutbourne East. It is situated some 5 miles from the city of Chichester and five miles from the boundary with Hampshire. The majority of the Parish protrudes into the Area of Outstanding Natural Beauty of Chichester Harbour with a long coast line. The main settlement area, however, lies to the North of the AONB and to the South of the A27 trunk road. There is a station with an hourly slow stopping service west to Portsmouth and East to Chichester, Brighton and London. There is an oversubscribed Primary school but no shop, medical or recreational facilities.

Our Neighbourhood Plan was ‘made’ in 2015 and 25 houses were identified in order to meet the needs of overall strategic housing objectives. In fact 200 have been built. This has increased the number of dwellings to 980. With no additional infrastructure. There are no brownfield sites left to build on and the only land for development is top grade agricultural fields or green spaces.

The work on reviewing our Neighbourhood Plan has been paused as Chichester have not been able to proceed with their revised Local Plan. Consequently, as from July of this year, Chichester are no longer able to demonstrate a 5 year supply of housing. As a result of this Chidham & Hambrook have been deluged with planning applications from speculative and opportunistic developers for either large scale or medium housing developments. If these are permitted our Parish will increase its population by 100% and, if driven through, will destroy our semi-rural villages and do irreparable damage to significant wildlife habitats and pollute the environment.

We welcome the opportunity to comment on this Paper but would like to see more detail on how community’s like ours can be protected.

**Pillar One Planning for Development**

**Proposal 1 – Simplify land use plans**

**Question 1 What three words do you associate most with the planning system in England?**

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

Yes Chidham & Hambrook Parish Council is a statutory consultee on planning applications and developments in our Parish as part of Chichester District.

**Question 3 Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future? (Social media / Online news / Newspaper / By post / Other – please specify)**

We feel that every method of communication planning applications and proposals should be used. Both traditional methods and online and social media. It is essential that the information reaches the widest audience possible.

**Question 4 What are your top three priorities for planning in your local area? (Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify)**

In a semi-rural area sandwiched between The South Downs National Park and The AONB of Chichester Harbour we are concerned about impact on the environment, climate change and the protection of our green spaces and agricultural land. As the area is heavily weighted towards larger, more expensive houses we are also concerned about affordability and providing housing for local people.

**Question 5 Do you agree that Local Plans should be simplified in line with our proposals?**

No If Local Plans are to be reduced to allocating land for development and losing the evidence base and policies that underpin the process of identifying sites this will not help communities engage in democratic process?

Plan making appears to be reduced to selecting areas for development based on three tiers and then removing any accountability to be able to shape those developments

There is scant detail on how the three tiers of areas for development will be determined and what protections communities have that theirs will not be inappropriately classified. The definition of Renewal Areas, in particular is vague. Gentle densification , infill of residential areas and development of rural areas could very easily lead to concreting over the countryside and ribbon developments joining up village settlements There is also insufficient clarity on the definition of Protected areas . Individual settlement identities and wild life corridors need to be taken into account. There is no mention of the importance of agriculture and growing our own food in rural areas. This will become even more important after we have left the EU. The pandemic has shown the need to become more self-sufficient.

**Proposal 2 – National development management policies**

**Question 6 Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?**

No Development Management Plans will reduce the role of Local Plans to site identification and not allow for the bespoke policies which reflect the specific and unique character of each area. Local and Neighbourhood Plans allow for distinctive characteristics to be retained preserving the uniqueness of different localities that make up districts.

**Proposal 3 – Replace test of soundness with sustainable development test**

**Question 7a 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?**

Not without much clearer detail on the simplified process which will be used to assess the environmental impact of plans.

Before removing the current Sustainability Appraisal system it is essential to know what will replace it and if it will offer enhanced protections. With so much of the natural environment at threat it is essential that protections are more robust than they are now.

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

There needs to be far greater capacity and responsiveness from statutory organisations, emerging bodies such as statutory sub-national transport bodies, Local Enterprise Partnerships and County Councils, to enable strategic planning and infrastructure matters to be identified and delivery supported.

**Proposal 4 – A standard method for establishing housing requirement figures**

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

Specific constraints must be a key consideration. In the Chichester District the location of both the AONB, the National Park, flood plains and wetlands are significant constraints. The available space represents 30 % of the district. The knock on effect is that housing will be targeted in the small, rural villages which is expensive, unsustainable and not appropriate for those on low incomes. It will do nothing to provide low cost homes for those who need them and so called affordable homes in this area are anything but. This makes no sense in terms of sustainability and climate change as a car will be a necessity. It is likely to produce massive urban sprawl swallowing up local village identities and placing an intolerable load upon transport, water and sewerage infrastructures.

If the Green Belt is to be protected there has to be another mechanism for distributing the housing target.

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

No A standard methodology applied across the country to distribute housing targets, prioritising the least affordable areas will not lead to any solution for the housing crisis. Building more homes in high priced areas will mean an oversupply of expensive housing. In areas which are more affordable there will be a short fall.

Social Housing needs to be taken out of the hands of developers, whose remit is profit making, and into the hands of councils

**Proposal 5 – Automatic grant of outline permission**

**Question 9a Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?**

No If land in Growth areas is automatically given outline permission this does not guarantee the necessary scrutiny when plans are brought forward. It is essential that there is full scrutiny through the standard planning process to ensure that infrastructure is planned for and communities will be protected from inappropriate development.

**Question 9b Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?**

Not decided on the information available. This needs more detail as to how this ensures that locally important issues are taken into account.

To say ‘we will consider the most effective means for neighbours and other interested parties to address any issues of concern’ is sparse on any detail as to whether this will have the same weight as the current arrangements. This statement is too vague and needs clarification.

**Question 9c Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?** No This would remove local democracy forcing decisions on local authorities

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

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

No this could lead to poorly designed applications having to be accepted by local authorities before they run out of time leaving them unable to engage with developers and negotiate schemes which would be more appropriate and acceptable for the built and natural environment. Removing the ability to extend would mean consultees, such as Parish Councils, would be pressured into giving opinions without being able to make the necessary investigations and consultations with residents, stakeholders. This would be to the detriment of the communities we represent. There needs to be more detail on how standardisation of technical supporting information will work to ensure that areas with sensitive issues have enough information to mitigate impacts.

Refunding planning application fees to developers if they win appeal could lead to planning decisions made on the basis of financial constraints.

Digital tools would need to be designed in a way that are readily accessible to those submitting small scale developments and applications.

**Proposal 7 – Visual, map-based Local Plans based on digital technology**

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

Yes this would lead to greater community engagement and participation. Access would need to be secure for all groups.

**Proposal 8 – Statutory timetable set through legislation for plan-making process**

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

No. The proposed time scale for authorities to embark on and complete a Local Plan is unrealistic. Local Plans depend on information from a range of statutory bodies, all of whom would need to respond in a timely manner- which is out of control of the Local Authority.

**Proposal 9 – Retain Neighbourhood Plans**

**Q13a Do you agree that Neighbourhood Plans should be retained in the reformed planning system?**

Yes, Neighbourhood Plans are a valuable means by which local communities can shape the development of their areas within a shared vision. There is little detail here on what is meant by their content becoming more focused and how this would fit in with proposals for Local Plans. The revised time frame for Local Plans would make it difficult to produce a Neighbourhood Plan in alignment. There is no clarity on their scope or power within the new guidelines.

It is our view that extending NP areas to individual streets would be extremely difficult to manage.

**Question 13b 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?**

Digital tools for design and plan making would be welcomed. However, they would need to be accessible to reflect the wide range of expertise to be found in communities. There would need to be training packages and time for assimilation.

 **Proposal 10 – Stronger emphasis on building out through planning**

**Question 14 Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?**

This needs more clarification. We would welcome the faster delivery of housing developments as long as this was accompanied by the appropriate infrastructure. Speeding up development could lead to a community being overwhelmed with new residents with insufficient facilities. There would need to be robust agreements on how different development types would impact on design, housing mix, tenure type etc.

**Pillar Two: Planning for beautiful and sustainable places**

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

Our Parish has seen several sizeable housing developments in the past decade. Only some small (up to 10) infill developments might be perceived as “beautiful and sustainable”. The vast majority of the houses pushed up in Chidham & Hambrook have been quickly built and certainly not of sufficiently high quality to stand the test of time which is one of the White Paper’s criteria. Many new build homeowners lament the poor quality of their new homes only a few years after their purchase. Infill small site development might be seen as having benefited from better design, but these small housing developments don’t get included in the housing numbers which so preoccupy our District Council (in their impossible task of seeking to have a constantly replenished 5 year land bank for development and housing target numbers that will for certain destroy the narrow band of land that exists between our outstandingly, globally important AONB of Chichester Harbour and the South Downs National Park.)

The larger developments in our Parish have been designed with little focus on “*building a sense of community”* through adequate emphasis on provision of meaningfully sized “*gardens, parks and other green spaces in between”*

We see no attempt to build *beautifully* – rather the opposite. This is to an extent understandable as building amorphous houses makes the developers marketing task easier. But bland is far from beautiful. The main focus seems to be just Build, Build, Build – motivated by a need to comply with Central Government targets for housing numbers with almost total disregard for the creaking infrastructure on to which all new builds are superimposed. Inadequate long-term thinking; inadequate transport links; complete absence of increased school/education capacity – the list of missing items is endless.

This particular area of West Sussex was beautiful and now our mission has to be to make sure that insistence on complying with imposed targets does not rule the day. If we do not protect the wildlife habitats that remain, they and the wildlife that are unique to this very small area of West Sussex will be destroyed for today’s residents and all future generations.

**Question 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)**

We have just completed another Neighbourhood Plan Questionnaire – hand delivered and collected from more than 1000 dwellings. We have a very good picture of the strength of feelings of almost 60% of our residents. Protection of habitats and wild life corridors are a significant consideration.

Given the poor public transport infrastructure increase in housing will increase car dependency. One bus every 20 minutes travels along the main artery of the A259 going both East to Bognor Regis and thence to Brighton and West to Portsmouth. In our Parish that is all we have on the road transport front.

We are served by Southern at Nutbourne Station – a good 30 minute walk in many cases without access to pathways on either side of what are mostly country lanes. Improvements to public transport infrastructure are key.

Almost all the residents of recent sizeable developments lament the absence of larger gardens and in most cases no green and open spaces. The current and ongoing epidemic has stressed the need for all ages to get out for exercise and fresh air. Imposing ever more houses on a parish with very weak transport infrastructure will simply make air and noise pollution worse.

We are very disappointed indeed at the quality of the new buildings from an energy efficiency perspective. Some developers have ignored issues such as the automatic provision of solar and alternative methods of heating.

We believe no construction of any new dwelling should permitted to commence without the detailed build plan being based on the latest environmentally-friendly methods for lighting, heating, power generation and water usage.

Our Parish already suffers from inadequate water supply and sewerage treatment infrastructure with no clear line of sight that suggests these will be addressed.

Yes: more trees; more open and green spaces. **The White Paper has minimal content for these issues.** And the issues of climate change and more frequent extreme weather patterns appear to be mostly ignored by developers.

**Proposal 11 - Make design expectations more visual and predictable**

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

This consultation has a deadline of 29th October 2020 and thus comments made by that date cannot in any way respond to the promised National Design Code nor indeed the revised and consolidated Manual for Streets. Is this not therefore putting the cart before the horse?

We appreciate the statement that *designs and codes should only be given weight in the planning process if they can demonstrate that this input has been secured.*

This said we find a good deal of contradiction throughout this White Paper as in some areas it is suggested that less local parish council input is to be expected and yet elsewhere the consultation documents suggests that the planning process should reflect what is *“provably possible and works locally”*

With modern computer programmes there is absolutely no doubt that much clearer, sharper 3D visual presentations of proposed developments is easy and relatively inexpensive.

The current swathe of planning applications in our small parish tends to be based on populating applications with masses of mostly technical documents. Very often the documents attached give the lay person (i.e. local resident) zero easily understandable information and certainly nothing visual on which to judge the **quality** of any aspect of the proposed dwellings. More visual data and less turgid paperwork can only be an improvement of the planning process.

As the Parish Council we are selected to represent the best interest of our parish residents. If the new design guide and codes do genuinely take into account the diverse quality, size and beauty of the broad range of dwellings that exist in our parish, then we should be able to support their application. From what we have seen from the range of developers that have built in our parish in recent years very little care and attention has been paid to any aspect of design. Agreeing the most appropriate local designs to create a diverse, vibrant and happy local community will require much more consultation and time.

Further clarification is necessary because from the White Paper it is not clear what weight local design codes will have if the Housing Delivery Test is not met and thus the Local Plan is deemed out of date. Nor is it clear what evidence, empirical or otherwise will be required nor indeed how the term “*popular”* may be applied in our local context.

Design codes must be local and not ‘off the shelf’ national templates.

**Proposal 12 – Design codes to support transition to more visual planning**

**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?**

We agree that to achieve this splendid conceptual vision will take time and require substantial upskilling of the planners and their leaders in most if not all local authorities.

We welcome the thinking that wider monitoring of what is actually being built across the many diverse regions of our country will be given greater weight and we would support stronger sanctions where standards set are clearly not met.

Our Parish supports the concept of a raising of standards across planning and specifically within our local council. Injection of new blood with new ideas and approaches should be a central tenet for all managements.

The concept is fine on paper. There are very few examples of really beautiful housing developments in our country. We have seen zero emphasis on either beauty or place-making in the sizeable developments built either in our Parish or in neighbouring parishes. Houses have been erected, sold (or not) and little care and attention has been given to the well-being of any of the new residents. It seems as if no thought has been applied to exactly how such incoming residents will cope with their new lives in very average quality homes.

Lack of forward, long-term planning which might well have seen a “new town” being built within striking distance of Chichester when it came to the local council’s table was simply not even considered.

Any selected Chief Officer for Design and Place-Making will have a monumental task not to mention several very tough battles with the plethora of developers who see the current period of expired or not yet completed Local and Neighbourhood Plans as “open season” to submit applications to build yet more ugly, cheek by jowl estates of little red boxes – in a county where flint for years was and should remain an integral part of our local design code.

So, yes, a good concept, but where in post Covid UK will the money come from to realise such beautiful concepts? And the role of a Chief Officer will require more clarity and a very tight job description.

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

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

We support this conceptual proposal. Provided Homes England gain sound, detailed local knowledge from local parishes and their residents through face-to-face meetings and boots on the ground encounters this can and should ensure that local design features are perpetuated rather than lost for ever. Design needs to take into account minimum floor areas, carbon efficiency, adequate garden space.

Local plans must be design led but much broader-based than just on the house level. A workable plan must address the ‘big picture’: houses; street scenes; roads; cycle routes; footpaths; landscape quality and the very best available energy efficiency in the overall design.

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

The three pronged strategy all looks good on paper. Good design is clearly very subjective – beauty is in the eye of the beholder and is subjective.

Current targets imposed on Chichester District Council and thus imposed on our Parish might suggest that a relatively tiny semi-rural group of small hamlets has somehow been categorized either as a *‘growth area’* or worse still as a *‘renewal area’.* **WE ARE NEITHER.**

We could support any strategy which has as its objective to improve the quality of design – let us please build quality that will stand the test of time as happened in earlier eras in our country – one only has to look at the value attached today to the quality of build and design created in the Edwardian and Victorian periods.

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

The aims are to be applauded. We note with interest this Proposal intends to heed and give weight to input from local neighbourhood planning groups. Local engagement is crucial and people must be heard.

In conceptual terms, we support the approach

**EFFECTIVE STEWARSHIP AND ENHANCEMENT OF OUR NATURAL AND HISTORIC ENVIRONMENT**

Our Parish lies between the unique marine AONB of Chichester Harbour and one of England’s most unspoilt, but recently denominated National Parks - The South Downs. We thus believe that we are absolutely entitled to see our Parish and indeed our neighbouring Harbour Village Ward Parishes of Fishbourne and Bosham as being PRIORITY areas of natural beauty which need to be treated as a special case so that our unique natural environment is preserved rather than desecrated by ever more building of homes.

We encourage our Government to take action now (in 2020) to ensure that the natural and historic environment that exists in our own and neighbouring parishes stops being bombarded by excessive building development with zero mitigation or adaptation to the very visible effects of climate change in what is for many residents a harbour-side environment.

We commend the proposal that all new streets will be tree-lined. However, this will simply not fit in semi-rural village locations such as ours. The planting of trees must be actively encouraged across England – yes. But planting trees in all new developments will require much better spacing of housing ( which will be loudly applauded by their future residents) so as to ensure that no light is lost inside the houses.

We equally support the move to make mandatory net gains for biodiversity law and for there to be similarly mandatory green infrastructure standards for all new developments.

Our Parish has a large number of roads which are historically narrow because they are more appropriately named as “lanes” – completely fitting for an historically fertile farming settlement going back to Roman times. There is in our minds a massive mismatch between the density of developments that have been permitted and the essential need to provide safe walking, cycling and public transport opportunities for all ages of residents. On this criterion alone, no further development even under the proposed reforms would be permitted. Developments must protect the natural and historic environments but not destroy the sacrosanct uniqueness of countryside and harbour villages.

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

This is very important. We see much more varied weather and increasing numbers of severe storms with very strong winds and heavy wind-driven rain, often coinciding with spring tides. Land on the periphery of the harbour will almost certainly flood in the near future. This needs to be protected from developers.

Our Parish sits as advised between an AONB and a National Park. Climate change is a major challenge to our Parish. We are concerned that development management policies could be centralised with inadequate consideration being given to very specific local issues.

We are very concerned that excessive housing development in our area will destroy our wild life habitats Net bio diversity gains, such as attaching bat boxes to new builds, will not be enough to ensure these habitats aren’t lost for ever.

We are a Parish with a multitude of properties with stunning and important views to all points of the compass. Planning authorities in recent years have simply disregarded the importance of views! We heartily support more focus being given to preserving views of landscapes which impact on our residents’ wellbeing.

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

In principle yes butLet’s make the assessment of environmental impacts of all development simpler and quicker but NOT at the same time diminished in terms of ensuring that development is sustainable and all impacts on the environment are minimised and mitigated. We must ensure that all development in our area provides adequate protection for the protected and now very endangered species of very mobile and thus vulnerable water voles, dormice and bats.

The consultation paper is right. Much of the paperwork currently required for planning applications means little to the ‘man in the street’. Overly complex; lacking visual images; anachronistic; not fit for purpose and very often too far from the truth and opaque in the extreme. Timelines and Key Dates should be made 100% clear not just to the applicants but also to a reasonable population of neighbouring residents. The manual displaying of planning applications on gates, gate-posts leaves a great deal to be desired. We live in the 21st Century and many suffer from computer/email phobia but in this increasingly fast-moving century we must make sure that all those residents who are literate can have ready, home-based access to The Internet. Planning data once simplified should be predominantly digitalised and in colour with plot plans and layout plans able to be expanded so they can be understood in detail. The process will speed up if all parties have to be transparent and open. Failure to do so should be an offence under the law of this land.

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

It is essential that under whatever may be finally retained as England’s Reformed Planning System local parishes and local communities provide their knowledge of historic buildings, gardens, open spaces and views that must be protected and preserved. **This must be a local contribution to the process.** Each parish in England should with today’s technology be able to hold and update on a regular basis with photographs the historically important sites and sights/views in their parish. A modern Doomsday Record! The Paper is short on detail about how this would be achieved.

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

Yes, we support any measures to ensure that all dwellings built from today meet the highest standard for energy efficiency. Not to do so and ensure all homes are future proved would be madness

There is need for much tighter control of all building developments starting TODAY to avoid retro fitting houses in the future. The aims are laudable but significant investigative and supervisory resources will be need to police the quality energy efficiency standards in new build developments with appropriate work-stoppage rules enforced where blatant evidence of shortfall in standards is found. The proposal to build Zero Carbon Homes in 2016 did not happen and now there is a four year delay and homes are still being built to inadequate standards.

**Pillar Three: Planning for infrastructure and connected places**.

**Question 21 When new development happens in your area, what is your priority for what comes with it? (More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don’t know / Other – please specify)**

In our Parish level we need to balance the needs of local people for affordable, quality homes with protection of our semi-rural area. And to have adequate infrastructure and facilities to enable all residents to lead safe, good quality lives. The current lack of infrastructure, shops, medical services, leisure facilities etc means all households have to use their cars to access these essential services in neighbouring parishes. This is already placing a heavy burden on our local mostly single-carriageway road system., causing congestion and pollution. Public transport is poor and non-existent in the village of Hambrook that is targeted to take brunt of more housing.

**Question 22a 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. S106 and CIL are different; in the absence of more detail on how a combined Community Infrastructure would work we would not support this proposal. CIL is important to local Parishes like ours to contribute to local infrastructure. S106 is linked to specific developments for infrastructure across the District. CIL is the only means by which we can support small scale projects needed because of the uplift in residents.

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

It has to set locally to take account of huge variations within the Chichester District but also nationally. The timing of any such payments is crucial such that developers have an incentive to complete developments and not to leave sites uncompleted. If set at a national level it would be lower than is required in the Chichester District. High levels of mitigation are needed because of the specific characteristics of the District in Special Areas of Protection and Conservation and environmental considerations.

**Question 22c Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? (Same amount overall / More value / Less value / Not sure. Please provide supporting statement.)**

At present insufficient funds are raised to provide any of the essential infrastructure needed; so significantly more is needed.

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

No Local authorities have no control over what happens once planning permission is given. It is often years before anything is built; developers often sell on (at a profit) a practice that should not be condoned.

**Proposal 20 – Apply Community Infrastructure Levy to Permitted Development**

**Question 23 Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?**

Yes, as it would secure more funds toward infrastructure.

**Proposal 21 Reformed CIL should deliver affordable housing?**

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

Yes, there is a high need for affordable housing locally. The need for affordable housing is related to the employment market and generally increases as the economic outlook drops. Developers should not be able reclaim payments in such circumstances. This is especially important in Chichester District as it is one of the highest priced areas in the country.

**Question 24b 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?**

They should be secured as a right to purchase by Housing Associations and Local Authorities. It is disappointing that this Paper does not address the need for Local Authorities to be able to build their own social housing to be kept in perpetuity as that. The thousands on the Housing Registers will not be helped by any proposals in this Paper.

**Question 24c If an in-kind delivery approach is taken, should we mitigate against local authority overpayment?**

Yes, the developer should have no rights to claim overpayments.

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

Yes , there should be no lowering of standards for ‘affordable ‘homes. They need to meet or exceed the National Space and Future Hones standards. There needs to be robust enforcement of this.

**Proposal 22 – More freedom over infrastructure levy spending**

**Question 25a Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?**

Yes, Local Authorities need to ensure areas with the highest need get sufficient funds to address their needs, particularly with affordable housing

**Question 25b If yes, should an affordable housing ‘ring-fence’ be developed?**

Yes. It is vital that the levy is ring fenced for affordable housing to ensure an appropriate percentage of housing is delivered to meet the local identified needs.

**Proposal 23 – Develop resources and skills strategy for planning sector**

No question attached. Planning reforms MUST be accompanied by the necessary financial means for Local Authorities to carry out their planning statutory duties without having to limit their ability to do so thoroughly. This Paper has many proposals which, of implemented, will carry considerable extra public funding. Local Authorities must not be left in a position of having to fund changes without the necessary funds.

**Proposal 24 Strengthen enforcement powers and sanctions**

No question attached. Enforcement needs to be rigorously applied to deter those who seek to build unauthorised developments or destroy habitats, vegetation, trees. Fines should be increases as they are not a sufficient deterrent.

**Question 26 What are your views on potential impact of the proposals on people with protected characteristics as defined in Section 149 of the Equality Act 2010?**

Locally we have an aging population with accompanying disabilities living in houses that are too large and difficult to upkeep. There are almost no acceptable alternatives for those with who wish to be independent, want to feel safe and with accessible health services.

Any design codes for housing needs to take account of the changing needs of people throughout their lives. Infrastructure needs to be accessible for everyone.

**Chidham & Hambrook Parish Council**

**October 2020**