



## SOUTHWATER PARISH COUNCIL

Beeson House, 26 Lintot Square,  
Fairbank Road, Southwater,  
West Sussex RH13 9LA

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Planning for the Future Consultation  
Ministry of Housing, Communities and Local Government  
3rd Floor, Fry Building  
2 Marsham Street  
London  
SW1P 4DF

14 October 2020

Dear Sir or Madam,

### **RESPONSE TO GOVERNMENT CONSULTATION DOCUMENT: WHITE PAPER: PLANNING FOR THE FUTURE**

This council welcomes the opportunity to respond to the *White Paper: Planning for the future* consultation.

Southwater Parish is located immediately to the south of Horsham with Horsham district in the county of West Sussex. The parish is semi-rural in nature with Southwater Village the primary settlement and the communities of Christ's Hospital, Tower Hill, Two Mile Ash, Newfoundout also within the parish boundary.

In 2013 the Parish Council decided, after consultation with the local community, to produce a Neighbourhood Plan under the powers given to it by Localism Act 2011 and subsequent orders. Since that decision, considerable time and resources have been expended on the project, with extensive consultation and interaction with residents, community groups, and other stakeholders at its heart to provide a meaningful vision for the future. Southwater Neighbourhood Development Plan is now at the referendum stage having been found acceptable by an independent examiner and Horsham District Council. However, due to the COVID-19 pandemic, this referendum will not occur until 5 May 2021 at the earliest. We hope that the referendum will take place as soon as possible to ensure that Southwater Parish benefits from the allocations and policies in the Neighbourhood Plan.

The benefits of neighbourhood planning to Southwater are wide ranging. It has enabled the local community to become actively engaged in the area they live in, playing a much stronger role in shaping the area and supporting new development proposals as a result. It has allowed the local community to address issues that are important to them such as retaining Southwater as a single centre settlement with sufficient shops and services, allocating the right type of housing in the right place to meet the needs of the community, and protecting valued local green spaces. Alongside this our plan also addresses the wider housing need of the area, allocating a site for the provision of 422 - 450 new residential units (consisting of a minimum of 350 units falling in Use Class C3\* and a minimum of 72 units falling in Use Class C2). The site will also provide a minimum of 8 hectares of public open space ensuring that our existing community retains access to the countryside.

Through our experience of neighbourhood planning, we believe that communities are willing to embrace new housing allocations that aligns with local aspirations provided they can make the decisions on the type and location of new housing development. Studies consistently show that areas with Neighbourhood Plans in place are allocating more housing than those without. Crucially it is the housing that local people want.

It is our view therefore, that retaining neighbourhood planning in the new system is vital to allow local communities to have a real say in their area and deliver the housing that this country needs. The introduction of neighbourhood planning in Southwater has allowed greater democracy in the planning of the area which should not be weakened in any way.

It is not clear from the White Paper how Neighbourhood Plans fit into the new system.

It is important that the time and effort and resources put into these plans and the resulting benefits achieved by plan making in the area (such as local ownership of development proposals and enhanced locally controlled infrastructure through CIL contributions) is not lost or ignored in the government plans. It is vital that the proposals make clear what the future scope and power of Neighbourhood Plans is going to be.

**Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.**

**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?**

This council has grave concerns regarding the method for calculating housing requirement figures in light of the recent consultation on the revised methodology. That approach would result in a requirement for 1,715 dwellings per year in Horsham District which far outstrips the amount of available land. Along with Horsham District, Southwater Parish Council, through the Neighbourhood Plan has helped to deliver a significant amount of housing for the district and helped meet unmet housing need in Crawley. We consider that the standard methodology figure of 1,715 is unacceptable high and unattainable which will result the wrong type development in the wrong places with insufficient infrastructure, exactly what the planning system is meant to avoid. We support the detailed response to that consultation given by Horsham District Council dated 01<sup>st</sup> October 2020.

In relation to the White Paper transitional arrangements it should also cover housing requirements to avoid confusion with authorities being left with unreasonable and untested requirements in the period between publication of its Reg 19 plan and the receipt of the Examiners Report. The exemption from not having to use the revised standard method for plan-making, should also apply to the Housing Delivery Test and Housing Supply Tests until the submitted Local Plan is adopted, fails examination or is withdrawn.

It is of great concern that the revised standard methodology approach alongside the White Paper proposal for overall housing numbers for local authorities being imposed by Government will simultaneously reduce the influence of communities through neighbourhood planning and lead to greater levels of housing in the wrong places.

It should not be the role of central government to decide the level of housing in an area with no say from the community. Those decisions are best taken in a transparent and accountable way as part of a democratic process between local communities and the Councils and Government that represent them. We therefore object strongly to a "standard method" imposing housing numbers by central government, that are binding on the local authority.

**Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools**

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

**Question 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?**

The main section relating to Neighbourhood Plans is Proposal 9, which states: "*Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools.*"

It is encouraging to see that the white paper supports the retention of neighbourhood plans and recognise that "*They have become an important tool in helping to 'bring the democracy forward' in planning, by allowing communities to think proactively about how they would like their areas to develop.*" The inclusion of Neighbourhood Plans in the proposed new system is welcomed but there are significant concerns regarding the scope of such plans in light of the brief wording regarding their role.

However, the proposal puts forward whether their content should become more focussed to reflect the proposals for local plans.

Within the reforms for Local Plans a front-loaded process of engagement and involvement is proposed. This appears to be a one-off time limited moment in the plan preparation process. At paragraph 2.48 the White Paper states that peoples' right to be heard in person will be changed with regards to local plan inquiries. Planning Inspectors will be given discretion over the form that an objectors' representation might take with the 'right to be heard' during a public forum removed. It is felt that this, coupled with the reduced or removal of engagement at the planning application stage reduces meaningful engagement in the planning application process at every stage and will rightfully result in a backlash from communities who feel powerless over the changes occurring in the local area. It is our view that community engagement, involvement and democratic oversight should be on an ongoing basis. There is an obvious risk that the more strategic stage of plan preparation will not pick up on issues that are of great importance to local communities that would normally be revealed at the application stage. The removal of local scrutiny and democracy at the application stage is considered to be a step backwards in democracy and accountability counter to the white paper claim of "*more democracy*".

The main proposal for “*more democracy*” is by harnessing digital technology making plans more accessible and understandable. Whilst making information more accessible and understandable is welcomed as an obvious benefit, it does not in itself allow communities to have a genuine role in shaping their area. It is our view that the proposals contained within the white paper will reduce the role of local communities in having a genuine say over their area. The proposals include a top down housing figure imposed by central government, limiting involvement at the examination stage of the local plan and limiting the opportunity for local consultation at the application stage. This will result, as already mentioned, in a backlash from communities who will resent that their involvement is merely a tick box or superficial exercise in the process. This will result in communities challenging the decisions in the courts and through local and national elections in any way to stymie development, not because communities necessarily reject development but because they reject being made to feel powerless in the area they live in.

The current scope of neighbourhood plans is wide, with limited restrictions on what they can address. This allows communities to address the most pressing local issues and respond to the requirements set by the District Council. In Horsham District, the Council chose to give local communities the option to progress and allocate sites to meet the District’s housing need. We have done so, and the resulting allocation is one which we firmly believe delivers on local priorities alongside those of the District.

It is not clear how neighbourhood planning will fit into the new planning system other than it will be retained. We therefore urge the government to consider the implications raised above and put democracy, accountability, and community involvement at the centre of the proposals for planning reform. It has been demonstrated through the Neighbourhood Plan process that genuine involvement of local communities results in more housing in those areas than without a Neighbourhood Plan, and crucially, that the housing is the right type in the right place for future occupants and for those that already live in the area.

**Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.**

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

The proposal is for design guidance and codes to be produced locally and states that this can already be brought forward through the work of neighbourhood planning groups. However, the new system would place greater importance on them, and they would be more binding on decisions about development.

It is welcomed that in para 3.8 where the proposals seek to retain the route for design guides/codes being brought forward through Neighbourhood Plans with effective input from the local community and considered in light of empirical evidence of the characteristics of the local area. We support the retention of the neighbourhood planning route to creating design codes and guidance and agree that input from the local community and evidence to inform them is crucial in making them credible and afforded sufficient weight in decision making.

However, the role of Neighbourhood Plans should not be limited to design codes and guidance. Whilst the design of development is important, development should also be the right quantity in the right place and of

the right type. Previous concerns regarding the genuine involvement of communities in this regard are not mitigated by proposals to improve the production and use of design codes. Limiting local say to just how development looks is not enough.

The option of having design codes at the street level is welcomed as it suggests local communities will be able to have a say over how their area looks. In light of the proposed faster production of local plans it is of concern however, that there will be limited time and the necessary resources to implement these design codes. It is therefore vital that these proposals are backed up by the resources to deliver them.

**Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished.**

This proposal would be based upon a flat-rate, valued-based charge, set nationally, at either a single rate, or at area-specific rates. The aim is to increase revenue levels nationally when compared to the current system. Revenues would continue to be collected and spent locally.

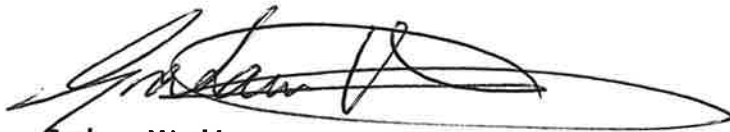
More money for the local community to spend on much needed local infrastructure is to be welcomed. Paragraph 1.23 states that the Infrastructure Levy will be more transparent than Section 106, and local communities will have more control over how it is spent. However, it is not clear under Proposal 19 what this greater control is. The current system where a Neighbourhood Plan is in place allows 25% of CIL generated within a neighbourhood plan area to be spent by that community on local infrastructure. This is a strong incentive for the preparation of a neighbourhood plan and involvement from the community. It also allows the people who live in an area to decide what infrastructure is needed and to then deliver it in the area where it is needed i.e. where the new development is going. In Southwater, we will shortly be preparing a Parish Infrastructure Delivery Plan (IDP), in consultation with the local community, which will guide where and how such CIL receipts are spent.

It is crucial that government maintains this system whereby the 25% of CIL money goes to local communities, to decide where it is spent. This will retain one of the incentives to produce neighbourhood plans and for the local community to be interested in having their say knowing that new development will contribute to the infrastructure in the area they live in. In most communities the lack of infrastructure to support development is a common theme in objections to new development – allow communities to address this matter themselves.

In conclusion, our main concern with the white paper proposals is a purported increase in consultation or "*more democracy*" that actually represents a reduction of genuine community involvement in shaping their area, along with incentives for the local community to be involved. It is of great concern that the proposal will detract from exactly what the white paper is aiming to achieve, namely moving democracy forward, increasing housing building and creating "*beautiful*" development.

Neighbourhood planning has so far been a great success in Southwater. We urge the government to retain the existing scope and role of neighbourhood planning and allow local communities to have a genuine role in shaping the areas they live in.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Graham Watkins', written over a horizontal line.

**Graham Watkins**

Chairman of Southwater Parish Council