These are the proposed responses from Albourne Parish Council.

|  | Question | Answer Box | Text |
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| 1. | Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5 year housing land supply (5YHLS) as long as the housing requirement set out in in its strategic policies is less than 5 years old? | Yes | We support this amendment because it will help to reinforce the role of the Local Plan and give a real incentive for communities to support the Local Plan making process. Once local evidence about housing need and good place-making principles has been established with the incorporation of information on concealed households where possible, local communities need to be confident that their LPA or a planning inspector will not be forced to approve additional development over and above what has been agreed. |
| 2 | Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)? | Yes | When an LPA does have to calculate its 5YHLS is should not be required to include additional figures which did not feature in its original assessment of housing need. If an LPA falls behind in housing delivery then incentives and support should be provided to help overcome delays. |
| 3 | Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable | Yes | We support previous oversupply being allowed for in the 5YHLS calculation because the total number of homes that a local area can absorb will relate to education, health, highways and other infrastructure which have a finite capacity. This amendment would make the 5YHLS more credible in assessing whether there is really shortfall in housing delivery. We support the approach proposed. |
| 4 | What should any planning guidance dealing with oversupply and undersupply say? |  | It should be clear about the period within which oversupply can be counted and what counts as oversupply for the calculation. We do not want another ambiguous formula which leaves room for debate at appeals. |
| 5 | Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans? |  | We fully support this proposed change. Albourne has had a Neighbourhood Plan since 2016 which has not been properly considered by the District Council as it makes strategic allocations as part of its Plan; however, given the limited scale of many Parish Council, even requirements for a 5 year review is exceptionally burdensome. It should be the case that in smaller and rural Parishes who have existed in their current stable form for tens or hundreds of years; have limited resources; and whose character is based on stability should not be required to revise their Neighbourhood Plans every 5 years. It would be more proportionate for the paragraph 14 protection to extend for 10 years. |
| 6 | Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for homes and other development our communities need? | Indifferent | The framework should recognise the multiple parties who have an interest and an impact on the delivery of new housing; and in particular the disconnect between housebuilding itself and the related infrastructure together with appropriate commitments to ensure that development does not occur without the delivery of related infrastructure in a timely manner. |
| 7 | What are your views on the implication these changes may have on plan-making and housing supply? |  | The local plans for housing supply should be properly assessed within the local Plan and related Neighbourhood Plans and not be subject to any override from top-down targets established by the standard method and dictated by the Planning Inspectorate. |
| 8 | Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above? | Yes | The Government is seeking to ensure that Local Plans deliver adequate housing to ensure:   1. that forecast household formation is catered for; 2. that concealed households can gain access to housing; and 3. that local social housing needs are met.   These should be locally assessed as part of the Overall Assessed Need (“OAN”) and not subject to a top-down standard method formula. Against this, the Department should provide a Ministerial direction to the Planning Inspectorate positively to consider constraints proposed by the LPA where the housing exceeds OAN but does not meet the Standard Method starting point.  Locally, an excellent example of this is Albourne which is part of the Downland Villages. It is a rural area in Mid Sussex, a District which is dominated by the South Downs National Park (SDNP) occupies a large part of West Sussex and is an LPA in its own right; and also includes the Ashdown Forest AoNB, both of which create significant development constraints.  This leads the District Council to have to extend their development plans into rural areas with very limited infrastructure because of the lack of unconstrained development area. This will cause significant change to the character of the rural area and should be recognised as a legitimate constraint when assessing capacity; yet under current NPPF guidance and Standard Method targets it is clear that the District Council is forced to consider the area to comply with PINS requirements. Note that in the Mid Sussex District the OAN is around 672 dpa and the Standard Method target is 1,119 dpa; and the only way that Consultants can justify the target is to propose inward migration to an “unaffordable” district that they state is unlikely to arise. |
| 9 | Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past oversupply may be taken into account? | Yes | The present Mid Sussex District Plan which has been to Reg 18 Consultation includes 2,000 houses in Albourne, a historic Parish of around 600 residents which sits in close proximity to the South Downs National Park and which currently has no infrastructure capable of sustaining such a development. This density is clearly out of character with all the villages in an area west of the A23 which forms a boundary between the rural countryside and the town of Burgess Hill. National Policy should allow this to be recognised as a constraint that limits the ability of Mid Sussex to deliver housing significantly beyond its OAN. |
| 10 | Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area? | None | Our view is that this assessment should be made with an emphasis on the issue of character rather than numerical calculations. Neighbourhood plans can provide detail on where development of inherently higher density, such as older people’s accommodation, would still be acceptable in a village or neighbourhood. |
| 11 | Do you agree with removing the explicit requirement for plans to be ‘justified’, on the basis of delivering a more proportionate approach to examination? | Yes | We support this proposal but with caveats. It will certainly make Local Plan preparation easier and quicker to prepare if the evidence an LPA has to produce does not have to cover all the options it has not chosen as well as the one which it does. However, we would be concerned if an LPA was able to propose strategic policies without having to satisfy an independent examination that these had a sound basis in place-making principles and aresupported by infrastructure provision. |
| 12 | Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which, if any, plans should the revised tests apply to? | Yes | Where Plans are at an advanced stage they have already been subject to extensive consultation and much of the evidence about options has already been gathered. We support assessing them in the way that was originally anticipated. |
| 16 | Do you agree with the proposed 4 year rolling land supply requirements for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no what approach should be taken if any? | Yes | We agree with this proposal because it is likely to reduce pressure on local communities whilst they update their Local Plan and any neighbourhood plans. |
| 18 | Do you support adding an additional permissions based test that will “switch off” the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement? | Yes | We strongly support this proposal. Where an LPA has granted planning permissions it should not fall to local communities to provide additional sites because those permissions are not being built out. We understand that there are numerous reasons why it can take time to implement a planning permission, but once granted it is up to the applicant to get on and resolve any issues with the relevant authorities. |
| 19 | Do you consider that the 115% “switch off” figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate? | No | We believe that the “switch off” figure should be set at the number of permissions necessary to meet the housing requirement rather than having an additional allowance on top. The “switch off” should therefore be 100% (i.e. all of the requirement but no more). |
| 21 | What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results? | None | This change should be introduced as soon as possible. |
| 22 | Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this? | Yes | We agree that the provision of some homes at the lowest feasible rent is an important part of housing policy. There are people within every community who will struggle to pay market rents. As HMG will be aware, this is as much a question of the economics of building and managing homes as it is a matter of finding places to build. We do need more homes for social rent but as a proportion of the total that we provide on sustainable sites. We hope that there will be other measures from HMG to make this possible in the future. |
| 23 | Do you agree that we should amend existing paragraph 62 of the framework to support the supply of specialist older peoples housing? | Yes | We understand that more specialist accommodation is required and that this needs to be planned for. It would also be helpful if the NPPF gave greater emphasis and support for policies which would lead to the provision of smaller open market homes (in preference to larger houses which developers may prefer) built in a way which is directed to the needs of older people because these would provide for down-sizing and could make care at home easier to provide. |
| 24 | Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)? | None | We agree with the aims of the small sites policy, but ensuring smaller sites are available is only one of the elements involved in promoting appropriate forms of development and helping smaller builders. |
| 25 | How, if at all, do you think the policy could be strengthened to encourage greater usage of small sites, especially those that will deliver higher levels of affordable housing? | None | One of the problems with small sites is that they quite often end up being promoted for a few, larger dwellings because this is more profitable for the landowner or developer. We can understand why this is, but the policy should work in a way which also requires that they deliver housing which meets need local need. |
| 26 | Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not registered providers in particular, community led developers and alms houses - to develop new affordable homes? | Yes | This would be a simplification of the current system and would enable a greater range of organisations to participate. |
| 33 | Do you agree with making changes to emphasise the role of beauty and place making in strategic policies and to further encourage well designed and beautiful development? | Yes | We agree that development should be better designed and that more attention should be paid to how it will be ‘a good place to live’ and not just ‘a place to live’. ‘Beauty’ is a subjective term, but if it is used as a shorthand for all of the aspects of design quality then it as good a term as any. However, when we are looking at the impact of new development our first concern is whether there is adequate infrastructure to ensure that it can be accommodated without doing harm to the existing community. |
| 34 | Do you agree to the proposed changes to the title of chapter 12, existing paragraphs 84a and 124c to include the word ‘beautiful’ when referring to ‘well-designed places’ to further encourage well designed and beautiful development? | Yes | If the impact of this change would make it more likely that the LPA and planning inspectors will refuse poor quality development then we support this proposal. |
| 35 | Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action? | Yes | It would be very helpful if the plans and drawings which define what has been agreed by the LPA are easier to follow and provide a better reference for what precisely has been agreed when planning consent is given. |
| 37 | How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass in new development? | None | We support small scale nature interventions and suggest that every Local Plan should be required to include a policy which requires new development to have regard to including them as part of measures to achieve biodiversity. We agree that artificial grass should not be installed anywhere in new development and if it possible to find some way to prevent natural turf being replaced with plastic with planning permission then we would support that. Other changes to the scope of permitted development rights might also be used to require small scale features to be incorporated or prevent them being lost as the case may be. |
| 38 | Do you agree that this is the right approach to make sure that the food production value of high value farmland is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land? | Yes | High value farmland is under a great deal of pressure and like many parish councils we are worried about the cumulative impact of converting it to other uses, even when those other uses also have benefits. We therefore support the change proposed. |
| 40 | Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature based solutions that provide multi functional benefits? | None | We support the use of nature based solutions to help mitigate the impact of climate change. However, if development is not well located then it becomes impossible to provide nature based solutions and we fall back on highly engineered and expensive alternatives. This is an area where there is a tension between HMG pressing for the delivery of new housing whilst also urging LPAs to ensure that housing is ‘beautiful’ and has the lowest possible impact on the environment. |
| 43 | Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62? | Yes | The proposal would seem to continue with safeguards to ensure that there is sufficient scrutiny of the local impact of onshore windfarms without effectively making them impossible to promote through the planning system as they are at present. Provided local communities continue to be given a high degree of say over whether they will accept a new windfarm and additionally that consideration is given to the associated economic activities that exist alongside the aggregation sub-stations such as battery installations. These need to be properly regulated with all associated environmental risks disclosed and mitigated. |
| 44 | Do you agree with our proposed paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance? | Yes | We agree with more emphasis being put on the benefits of installing energy efficiency measures when these require planning approval, bearing mind that if we are achieve carbon reduction and energy efficiency targets we have to accept some changes that inevitably go with them. However, we do believe there should be a requirement that they should be done as well as reasonably possible which includes considering their visual impact and effect on neighbouring properties. |
| 47 | Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative arrangements would you propose? | Yes | We agree that the proposals for Neighbourhood Plans are reasonable. |
| 49 | Do you agree with the suggested scope and principles for guiding National Development Management Policies? | Yes | We can see the benefits of National Development Management Policies (NDMP) provided they are implemented and have the scope which is set out in the consultation. We are still concerned, as are other organisations, that HMG might use NDMPs to implement changes in the planning system which HMG finds convenient and which then overrides local policies. We believe that HMG should be required to consult on any proposed change to the NDMPs and that there should be the opportunity for judicial scrutiny of whether a particular change is in accordance with the criteria HMG has indicated. |
| 50 | What other principles, if any, do you believe should inform the scope of National Development Management Policies? | None | There is no mention in the consultation of how the transition from the current system to the use of NDMPs will take place. We would like to know and be consulted on what is proposed and how this would affect existing Local Plans and Neighbourhood Plans. |
| 53 | What, if any, planning policies do you think could be included in a new framework to help achieve the 12 levelling up missions in the Levelling Up White Paper? | None | We support the levelling up principles insofar as they will spread the benefits of economic growth more widely around the county and relieve some of the pressure for development from our region. |
| 56 | Do you think that the government should bring forward proposals to update the framework as part of next year’s wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting? | Yes | We would support planning policies which make public spaces and green infrastructure safer and more accessible provided this does not lead to the excessive and inappropriate use of lighting or the removal of important features such as trees and shrubs. |