**HRA PLANNING FOR THE FUTURE**

**RESPONSE BY THE HIGHFIELD RESIDENTS ASSOCIATION SOUTHAMPTON**

**GENERAL**

Highfield Residents Association (HRA) covers Highfield and Portswood in central Southampton. It is the largest and most active residents association in the City with several hundred paid-up members. Dealing with planning policy and applications takes up the biggest proportion of the Association’s time and resources. HRA therefore welcomes this opportunity to share its experience and concerns with the Government.

Whilst there are some proposals in the White Paper that HRA can support – the strengthening of enforcement powers and sanctions (provided local authorities also have more resources), greater digitalisation (with safeguards), and the enhanced emphasis on design - the Association does not think that – taken as a whole – the White Paper proposals will achieve the stated outcomes. In particular, the Association considers that the diminution of the role of the local community envisaged in the proposals will not only weaken the planning system but is also in clear breach of the Localism Act which provides for further decentralisation to local councils, communities and individuals. Finally, there is the issue of whether the Government should be proceeding with such wide-ranging changes at a time of national emergency.

The remainder of this document sets out the Association’s responses to the consultation questions.

**RESPONSES TO SPECIFIC QUESTIONS**

1 HRA does not see the point of this question.

2 Yes.

3 There is clearly scope for improving access to the planning process, especially for people who do not belong to a residents association or local community group (where they exist). One way of tackling this would be for such residents to sign up to a local authority-sponsored ‘alert’ service for regular notifications of relevant local applications. In addition, the Planning Portal should be rejigged to make it more user-friendly, for example, so that documentation can be viewed on-screen with the option of downloading and saving. But whatever changes are made, it needs to be borne in mind that a significant proportion of the population does not use the net (so hard copies of documents should always be available on demand).

4 Preventing the spread of HMOs and short-term lettings (AirBNB). Introducing minimum space standards for new buildings. More family and first-time homes (including lettings for families).

5 No. There is no need for the simplification proposals.

HRA is aware of an analysis by the Local Government Association that 90% of planning applications are approved, and that there are more than a million homes with planning permission still to be built (a stunning case of a market failing to work). It is clear to HRA – if not to the Government – that the planning system is not a significant barrier to new homes (as opposed, for example, to the failure of developers to fulfil their side of the bargain).

However the shifting of detailed design considerations from the application stage to the Local Plan will slow down Plan making. In any case, a city-wide Plan can never reflect the complex of design factors that apply to specific sites across an urban area. So not only is there no good case for the simplification proposals, they will actually weaken the planning system and make it less effective.

6 No. HRA does not favour a national ‘one-size-fits-all’ approach to the development content of Local Plans or development management policies.

7(a) No. Local policy tests need to match different local environments and conditions: they should stay local.

7(b) There should continue to be a Duty to Cooperate test.

8(a) No. There are too many variables to be taken into account for any formula to be able to properly and fairly assess local housing need. More generally, the Association is surprised at the Government’s continuing espousal of algorithms in view of its recent unhappy experience with such devices.

8(b) No. HRA is not aware of any evidence relating affordability to the number of new-builds required, and none has been provided by the Government.

9(a) No. HRA sees no justification for having one kind of treatment for one area in a district and another for other areas.

9(b) No. HRA considers that the definition of Renewal Areas is too unclear to justify a separate approach.

10 No. Developers often make late changes to applications and local communities must be given proper time to respond. [NORA]

11 Yes, but subject to the caveat in the General section above. Not only should Local Plans be fully accessible but there should be summaries comprehensible to non-experts.

12 No. A statutory timescale for the production of Local Plans is desirable in principle but it is hopelessly impracticable given the shortage of experienced planners still in the public sector.

13(a) Yes, but they should not be sidelined by things like simplified housing plans and ‘design codes’.

13(b) Neighbourhood Plans should continue to be a major vehicle through which – beyond the Local Plan – local communities can express their preferences for new developments (including design). But we repeat our earlier warning about excessive reliance on digital tools and would certainly want to see the evaluated results of the trials referred to in para 2.57.

14 Yes. There have to be ways in which land hoarding is discouraged and windfall gains penalised. Serious consideration should be given to the following measures: a ringfenced tax on excessive planning gains with the proceeds fed into the local planning system; a capping of the land value at the time when permission is given; a time limit of, say, 5 years after which the permission would automatically lapse.

15 Generally, the design of new developments in our area – for example, new blocks of student housing – is boring and unimaginative, if not worse (photos can be supplied). HRA would like to see the Government and the local authority insisting on better designs that reflect, even if they do not imitate, existing local styles.

16 Fortunately, open space is less of an issue in our area. Energy efficiency should be a cardinal requirement of any new or converted property.

17 Yes, but HRA is sceptical of the extent to which ‘beauty’ can be created or protected through design guides or codes.

18 Yes, and there should be more training for planning officers in design.

19 Yes, but again we are concerned lest any intervention by Homes England fails to take account of the interests and views of local residents.

20 Yes, if the design complies with policy in Neighbourhood Plans, the Local Design Statement and appropriate local density.

21 The greatest need is for rentable social housing (which only the public sector can provide on the scale required).

22(a) No. There is no need to alter the current system which ensures funding for local services is delivered according to local needs.

22(b) The Infrastructure Levy should be set locally, to reflect local conditions and needs.

22(c) No. Refer to 22(a).

22(d) Yes. Borrowing would allow local authorities to adjust their requirements as they see fit.

23 Yes.

24(a) As already stated, the kernel of the current housing crisis is the lack of rented homes for families. Attempting to remedy this by discounting dwellings for sale does not help here. Indeed, levies place the burden of provision on local communities when it is the general taxpayer who should bear it.

24(b) The second: a ‘right to purchase’.

24(c) No, this is an over-complication. Currently, the on-site S106 affordable housing is specified and delivered for an agreed transfer price to a local authority.

24(d) Yes. The Infrastructure Levy affordable housing would need to be specified and delivered for the agreed transfer price as currently takes place for S106 affordable housing.

25 No. This would undermine the rationale for the Levy which would become just another form of local taxation.

**IMPLEMENTATION**

Proposal 23

HRA agrees about the need for a comprehensive resources and skills strategy for the planning sector. It considers that, as the principal beneficiaries of the present system, developers should bear the cost and not local or national taxpayers.

Proposal 24

HRA welcomes the proposal to strengthen **enforcement**. This is an aspect of the current system of which the Association has particular – and mostly unhappy – experience. In our view this is partly about local authorities having insufficient resources (see above) and partly about the inadequacy of the present framework and the inability of anyone to ensure that planning decisions are made to stick. Indeed, if there is one aspect of the current planning system that exposes it to disrepute, and even ridicule, this is it. For a number of ideas for strengthening enforcement, some directly based on our experience, please refer to the National Organisation of Residents Associations (NORA) submission.

However there is also a need to streamline the **appeals** process which is also a source of continuing delays and abuse. Here the Association would refer to the response of the North Southampton Community Forum which again is based on (mostly bitter) local experience.

HRA would be very glad to enter into discussion with the Department, either directly or through NORA, about the steps that might be taken to improve matters.

Roger Brown (Acting Chair HRA)

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