

TPC Responses to “Changes to the current planning system”

Question Number	Draft reply
1	No – For the PPG to be amended so that it is always the higher figure which has to be used as the baseline is too prescriptive. It will not deliver sufficient flexibility to permit local communities to decide whether or not there has been sufficient new housing in their area and consider whether or not it is time to stop building and reflect on the ongoing sustainability of their community.
2	No – where is the rationale for selecting 0.5% as a baseline? There is no justification in the document and it is impossible to make an informed decision without that justification.
3	No. The workplace based median house price to median earnings ratio is a moving target. The proposed calculation is too prescriptive and inflexible. It does not take other factors into the equation such as interest rates or factors affecting the local community, such as the collapse of local industries or major employers. There has to be room for local interpretation of all factors affecting.
4	Not entirely. Affordability is just one of many potential influencing factors all of which have an influence on a locality.
5	No. It’s trying to apply an inflexible mathematical construct to a scenario which is not dictated by mathematics and instead should be interpreted by those who best know their local communities .
6	6 months is probably not sufficient and 12 months is more realistic – meaningful consultation with local communities takes time
7	3 months is probably not sufficient and 6 months is more realistic, plus a further 12 months before submission – more time needed for meaningful consultation.
8	In rural areas particularly, the provision of Affordable Homes for rental is the most important aspect of the requirement for Affordable Homes, much more than First Homes. By top-slicing 25% for First Homes, this already diminishes the potential for affordable rented. Negotiations between local authorities and developers need to focus on how best to deliver affordable rented.
9	Exemptions already have an adverse effect on the deliverability of Affordable Homes. In areas where there is a proven need for Affordable Homes, top slicing for First Homes is not helpful. If First Homes are exempted, then the 25% should be added back to provide more affordable rented or possible shared ownership.
10	no
11	Small developments in rural areas should not be exempted. Clarity is required on the status of AONB which needs to be the same as a National Park.
12	It sounds reasonable as a transition arrangement but First Homes will not solve the problem of providing Affordable Homes.
13	Yes and the First Home should remain so, in perpetuity. It should not be possible to be sold on at the full market rate.

14	NO BUT It could depend on how many market homes are proposed in each location. How small is small? There seems to be an assumption that First Homes will, by definition, be Affordable Homes. If an exception site is granted planning permission, then the homes need to be the provision of Affordable Rented.
15	no
16	Yes THERE'S A DOUBLE NEGATIVE IN THIS QUESTION BUT I THINK OUR ANSWER WOULD BE YES
17	No. it would just become the norm and wouldn't be changed back. The SME builders are doing just fine, with plenty of activity all around the country. They should be required to pay their CIL contribution as normal
18	Other – 5 in the AONB; 10 in other areas. If small sites are exempted, then it will militate against the provision of Affordable Homes
19	NO
20	No The developers are doing just fine – there is no need to give them exemptions
21	No
22	Yes. The threshold in rural areas needs to be fixed at 5
23	Not needed. SME builders are doing just fine. It's the one industry that has been thriving throughout 2020
24	No Absolutely not. Permission in Principle is a recipe for disaster. There are insufficient safeguards built into the process. Insufficient time for proper consultation with the affected community and far too many loopholes with which the developers will have an absolute field day.
25	There should NOT be Permission in Principle for major developments. And in any event, the amount of commercial development included needs careful consultation with the local community. Commercial development can dramatically affect the sustainability of existing settlements, their high streets and their existing commercial offer.
26	No. There is insufficient information required in a PiP application. The devil is always in the detail – and there isn't any detail. By the time the PiP is progressed to a full application, there still isn't sufficient time allocated for proper consultation. It's a recipe for disaster.
27	Yes but we disagree with PiP's in any case
28	We disagree with PiPs for major developments but in any event Local authorities need to use any and every possible method to publicise all applications. Any use of IT alone will not be sufficient.
29	Not entirely. Why should major developments be capped at such a small level of 2.5 hectares. The major developers will be rubbing their hands with glee.
30	The rate needs to be determined by each local authority to reflect their specific needs
31	yes
32	More and better training for planning officers
33	No response.
34	No response.

35	Too much emphasis and reliance on information technology will disenfranchise certain groups of the population, most particularly the elderly or those who do not have access to IT systems. There is an ongoing requirement to retain conventional systems and methods of communication, especially at local level when consulting with local communities.
----	--