

Planning Policy

From:
Sent: 10 September 2018 16:56
To: Planning Policy
Subject: Comment on your issues and options consultation for the next local plan dated July 2018
Attachments: Local Plan Issues and Options comment.docx

Planning Policy Team

Please see attached comment on your issues and options consultation for the next local plan dated July 2018.

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Forward, 1.6, 2.3, 2.4: you are seeking feedback to ensure the Borough meet its residents needs in terms of housing jobs and infrastructure whilst protecting key environmental assets.

If the aim is to establish residents' expectations of the council through to 2036 rather than simply those of their elected representatives ¹ you should commit to extend your workshops to include a significant number of residents, ideally a series of open public meetings fronted by councillors and their senior executives.

This ensures inclusion ² and demonstrates that the council is not remote and insular. It will also minimise criticism later in the process. The same approach should be adopted if as and when the plan is revised.

2.5 to 2.9: Consulting in this way add credibility, strengthen the evidence base you refer to in 2.5. and 2.7 and contributes importantly to the sustainability appraisal at 2.8 and 2.9.

2.11: You should make a commitment to work directly with, inform and listen to residents with the intent of make the process inclusive for those without internet and/or social media access and for whatever reason little or no contact with borough or parish councils.

5.7 & Q6: Given the life of the plan you should review the HMA boundaries to ensure they meet the definition and include the results evidence base. This is on the assumption that the current boundaries have not been reviewed recently.

Q7: Given the area that solar farms occupy, recognising their long-term nature, and that the land is unlikely to be used again for its current purpose you should consider options for co-siting solar farm and new housing and commercial development ³.

Q8: In respect of windfall sites safeguards should be included to ensure that housing density is not significantly out of line with similar sites across the borough. To prevent large single occupancy housing.

Q10: You may wish to consider linking the ration between market and affordable housing in line with the income spread within the Borough.

Q11: There should be lower limit on the trigger point for affordable housing.

Q12: Not allowing cross subsidy between market housing and affordable housing on 'exceptional sites' may be discouraging developers from providing affordable housing. You should review this policy seeking to ensure that this is not happening. If it is then you should bring forward proposals to mitigate the impact.

¹ Many residents will have concerns that issues now being raised in the context of the 'local plan' were not fully explored during council elections and that councillors in the borough and its parishes do not have a mandate to speak for them.

² for those who don't have internet, social media or the press.

³ by mounting solar panels on the roofs of buildings

Q15, Q16: The elderly can normally look after themselves, however there may be a need to ensure single people and single parent family accommodation within affordable housing sector. To accommodate younger people with limited finance. It is a step to far to allow market forces alone to make this judgement.

Q17: Replacement and modified dwellings in the countryside should be subject to the same constraints in terms of size character and suitability as those that apply within the settlement boundaries.

Q23: You should have a specific policy on health and wellbeing.

It should as a minimum include measures;

- that provide safe local play areas for children within calling distance of parents' homes across all new developments; This can be at the expense of some of the more remote green spaces which parents are reluctant to allow their children to use for safety reasons,
- that encourage parents to let their children walk to school, in particular safe crossing points on all roads ⁴, provision and maintenance of footpaths and appropriate lighting, parking restrictions around schools at start and finish time to discourage school runs and reduce pollution in the vicinity of schools ⁵.
- open the current under used sports grounds and associated car parks at no charge to all unless pre-book for organised sporting events.
- that provide footpaths within all new developments which separate chairs and cycles, motorised or otherwise from pedestrians. In the interest of safety and to avoid accidents.
- it should include best advice on food and health eating.

It should not include;

- measures to limit supply and demand such as preventing the sale of sweets and sugary drinks near schools. It is for guardians and parents responsibility to decide what their children eat and drink based on current best advice. The council should respect that parents have responsibility for the welfare of their children and their role ends with giving best advice.

Q24 & 25: Some types of facilities and services need to be protected what they are and what protection they should be afforded are difficult to predict. It should be recognised in the plan that council facilities will not be removed by executive decision without first consulting widely with and listening to the residents. If necessary seeking independent arbitration where there is a significant divergence of views.

⁴ Ideally these should be light controlled crossing, but the simpler painted zebra crossings would be better than nothing

⁵ recognising that reducing speed limits below 30 mph increases the generation of pollutants in most vehicles.

Retail: The asymmetric arrangement that exists between internet and bricks and mortar shops which has been allowed to develop because the taxation system is slow to respond has destroyed the competitiveness of traditional retail sector. Although this is likely to be addressed in the medium term it is probably too late to save our town centres and much of the surrounding retail parks. If we wish to see retail survive outside the internet, and town centres flourish again then a new model needs to be allowed to develop. The shape of this is difficult to predict and will evolve with time.

As an example, retailers may want to move to showcase style stores which allow them to demonstrate new goods and services and allow customers to look touch feel and taste with sales coming later through the internet. This has the advantage of retailers not having to hold large stocks in many sizes or variants locally and opens the possibility of hybrid where demonstrations are made to a café style audience.

In developing the plan you should commission some detailed work to establish the most likely model/s and identify what council needs to do to encourage retailers back to our town centres

This may include but not be limited to;

- removing parking restrictions and charges to encourage greater footfall,
- a step change in investment to brighten up our town centers and encourage footfall;
- improved public facilities and extend opening times;
- improve public transport and access to the towns from surrounding communities (more of this later);
- remove restrictions on alcohol and other restricted goods in a way that encourages the development of a relaxed café culture.
- provide grants and incentives to retailers to encourage their return,
- lobby the county council and government to address asymmetries between internet and bricks and mortar retailers to place them on an equal footing in terms of taxation and other charges.

Q29: Recognising the above the council should adopt a more flexible approach to allow the widest range of use.

Skills: In addition, helping to provide apprenticeships in the building trade the council should encourage apprenticeships across the widest range of technical and rural disciplines to insure inclusion in the community for those who are not suitable for whatever reason to higher education.

Q35: The next Local Plan should require developers to demonstrate water efficiency. There is a case to curtail future development if water supply across the borough is threatened. It should be recognised that in some areas those who are relied on to advise on supply and demand have a conflict of interest as they will also benefit in the medium and longer term if there are shortages or supply difficulties.

Q36: Yes. you should identify sites for renewable energy. On-shore wind sites should be subject to the most rigorous environmental assessments and solar farms should as far as possible be co-siting with housing and commercial development,

Q44: Rural bus services will disappear in the next few years due to the dominance and convenience of the car. As a result, older people in rural communities will become isolated when they can no longer drive.

To address this the borough should either cease or reform taxi licencing system to encourage new entrants and flood the market. With time and increase availability cost will fall and taxis will become an acceptable replacement to buses. This will reduce isolation in rural areas and increase footfall in the towns as a large section of the community will again have access to economic and available independent transport.

In the longer term the council should also support and encourage the introduction of driverless cars as soon as they are safe. In providing this support it should recognise that driverless cars could have as much positive impact on rural life as the negative impact internet has had on our town centres.

Q45 Q46: The council should not define any parking standard within new developments. Subject to safeguards to protect affordable housing it should be left to market to decide what parking the developer provides.

The council should however make it clear that they will not permit overnight parking on any roads paved or green areas which they later adopt. This approach does not disturb trade but will act to depress the value of property without private parking provision as few will want to leave their cars remotely overnight and walk to them in the morning. To mitigate this developer will need to provide suitable private parking areas.

A similar approach should be adopted for commercial development.

Additionally, the provision of free public toilets and washing facilities should be a requirement for all new planning applications other than those for single private accommodation and should be applied equally and proportionately to commercial public and private developments alike.

Developers should be required to provide facilities in their premises at no charge or contribute to a trust which provides facilities locally. In the case of commercial and retail public facilities should be available for the same period as the sponsors premises is open.

This will mitigate the council decision to close facilities previously provided by them recognise that the alternative scheme has failed and was and is not fit for purpose.