



Planning for the Future Consultation
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Dedham Vale and Suffolk Coast & Heaths AONB team response to Planning for the Future White Paper Consultation

The Dedham Vale and Suffolk Coast & Heaths AONB team has reviewed the consultation document and have the following comments to make.

Proposal 1 in the Planning for the Future (Planning White Paper) the role of land use plans would be simplified. The government is proposing that Local Plans identify three types of land: Growth areas, Renewal areas and Protected areas.

Q5. Do you agree that Local Plans should be simplified in line with our proposals?

The Dedham Vale and Suffolk Coast & Heaths AONB team consider that some benefits may accrue from the approach outlined in proposal 1.

The team considers that the zoned approach could potentially ease pressure for inappropriate development within Protected Areas, that does not meet the statutory purposes of AONB designation, as it may be easier and quicker for developers to get permissions through in Growth and Renewal Areas. The team acknowledge that some development will need to be delivered in Protected Areas, to meet community needs

however, it is not currently clear how housing figures will be worked out for Protected Areas.

The Dedham Vale and Suffolk Coast & Heaths AONB team broadly agrees with the categories of land proposed for inclusion in Protected Areas, particularly, Areas of Outstanding Natural Beauty. The Dedham Vale and Suffolk Coast & Heaths AONB team considers that the setting of AONBs should be included in the areas defined as Protected Areas. This would ensure conformity with the Planning Practice Guidance which states

'Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account'

The categories may be too rigidly defined especially Renewal areas and more flexibility is needed to include land in the setting to AONBs.

This list of assets to be included in Renewal Areas is also not comprehensive. Further clarification should be provided about all the assets that could be included in a Protected Area category, to assist both consultees promoting land for inclusion in such an area and for Local Planning Authorities preparing Local Plans if these proposals are taken forward.

As drafted, proposals to permit the development of land in rural areas on the edge of villages in Renewal Areas, potentially conflicts with the proposal to protect open areas of countryside outside of land in Growth or Renewal areas. This matter needs further consideration and clarification.

The Dedham Vale and Suffolk Coast & Heaths AONB team recommend that consideration is given to including Nature Recovery Networks proposed through the 25 Year Environment Plan and Environment Bill within Protected Areas, as these could provide an essential buffer between any allocated Renewal Areas (particularly in rural areas) and Protected Areas if the proposals in the consultation are progressed further.

In 2019, one of the conclusions of the Landscape Review Final Report undertaken by Julian Glover (the Glover Review) recommended the preparation of Local Plans for Areas of Outstanding Natural Beauty. The Dedham Vale and Suffolk Coast & Heaths AONB team acknowledge that the government has not yet formally responded to the Glover Review. The Dedham Vale and Suffolk Coast & Heaths AONB team supports this concept and recommends that this idea is considered more fully as part of future reforms of the English planning system. As AONBs will fall either partially or wholly, within Protected Areas, a stand-alone AONB Plan could be a useful tool to identify the appropriate amount and type of development needed within the AONBs to meet local community needs while also meeting the statutory duty to further the statutory purposes of AONB designation to conserve and enhance natural beauty.

Proposal 2: Development management policies established at national scale and an altered role for Local Plans.

Q6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

Under proposal 2 general development management policies would be prescribed nationally, with a more focused role for Local Plans in identifying site- and area-specific requirements, alongside locally produced design codes.

The Dedham Vale and Suffolk Coast & Heaths AONB team consider that the proposed approach could be suitable for some generic policy topics and agree that there is scope for some policies to be prescribed nationally. The Dedham Vale and Suffolk Coast & Heaths AONB team consider that there are also certain policy areas e.g. policies related to AONBs that should be prescribed locally. This is necessary to ensure that the differences between land in and outside AONBs and the other legislative requirements covering AONBs is properly considered in the plan making and decision - making planning processes. The ability to plan and manage local distinctiveness must be retained at the local level or at the AONB level.

Proposal 3: Local Plans should be subject to a single statutory “sustainable development” test, replacing the existing tests of soundness. Under this proposal the Sustainability Appraisal system would be abolished in favour a simplified process for assessing the environmental impact of plans, to ensure compliance with the requirements of UK and international law and treaties (see our proposals under Pillar Two); the Duty to Cooperate test would be and slimmed down assessment of deliverability for the plan would be incorporated into the “sustainable development” test.

7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

The Dedham Vale and Suffolk Coast & Heaths AONB team consider that the Sustainability Strategic Environmental Assessment, (SEA), Sustainability Appraisal (SA) and Environmental Impact Assessment (EIA) processes are useful tools for assessing the environmental considerations of plans and projects. The National Planning Policy Framework, states that sustainable development encompasses 3 elements: economic, social and environmental considerations. The above processes ensure that all 3 strands are equally considered in the planning process.

The White Paper proposes introducing a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the development process while protecting and enhancing England’s unique ecosystems. The Dedham Vale and Suffolk Coast & Heaths AONB team acknowledge that there will be an additional consultation on this issue, but we have several concerns about the current proposal.

The Dedham Vale and Suffolk Coast & Heaths AONB team is concerned that the aim to speed up the environmental assessment process while protecting and enhancing England’s unique ecosystems may be contradictory and incompatible.

The Dedham Vale and Suffolk Coast & Heaths AONB team has concerns about the proposal to simplify the process for assessing the environmental impacts of plans (this is covered in more detail under Proposal 16 of the Planning White Paper). While such streamlining might speed up the plan making and decision-making processes, it might not automatically translate into the faster delivery of development. The Dedham Vale and Suffolk Coast & Heaths AONB team are also concerned that key environmental issues may not be adequately considered in the planning process if the environmental assessment process is over simplified.

Furthermore, it is not clear how the proposal to simplify environmental assessment requirements sits with the emerging requirement for developments to deliver 10% Biodiversity Net Gain, or the creation of Nature Recovery Networks.

Finally, if the proposed approach is adopted, it is essential that environmental aspects of sustainability are given equal weighting the planning process.

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 use land more effectively, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.

Q8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

To help increase housing delivery an amendment to the Standard Method for calculating Housing Numbers using either /or existing housing stock and household projections as a basis for the calculation is being proposed. It is also proposed that affordability is used as another metric in the calculation.

The standard method currently used provides the “starting point” for planning for housing delivery and numbers tend to be minimum. The proposed reforms for calculating housing numbers do not

- (a) “establish the housing requirement or need
- (b) enable councils to plan for a housing requirement that is lower than their standard method figure
- (c) enable Councils to correctly follow National Planning Policy Framework requirements para 11 by reducing their housing requirement in protected areas such as AONBs
- (d) set out how AONBs, should be considered when setting the local housing requirements as required by National Planning Policy Framework to ensure compliance with footnote 6 assets e.g. Areas of Outstanding Natural Beauty, National Parks and Heritage Coasts).

Linking the assessment of demand to either existing housing stock or projected household growth lock existing patterns of development into future growth, which has the potential to harm to Designated Landscapes, particularly, where the development does not accord with the purposes of designation.

Q8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

For some Designated Landscapes, where the designation covers most, if not all, of a Local Planning Authority's area, linking affordability to housing delivery is potentially an issue.

The Dedham Vale and Suffolk Coast & Heaths AONB team is concerned that using affordability as one of the metrics in the review of the standard housing equation could actually increase pressure for housing within Protected Areas, including AONBs, where houses prices tend to be higher. This is of concern, particularly, where development proposals are incompatible with the purposes of AONB designation.

Higher house prices are not just a reflection of a shortfall in the number of homes needed to house people working in these communities, but because Designated Landscapes are a desirable place in which to live, and people are prepared to pay more to live there. Simply building more market homes in such areas does not necessarily meet local housing needs and, because new homes tend to be of a high specification the more new homes that get built, tend to be higher than average house price.

Housing delivery rates are impacted by several factors including the pace of delivery of approved planning consents and issues like this should also be reviewed as part of planning reforms taken forward.

From an AONB perspective nationally, the overall amount of housing that is needed across the country, and the means by which it is spatially distributed at a strategic level, are less important if, at a local level, there are local policies and procedures in place that enable development to be managed in such a way that meets the needs of communities living within and on the edge of AONBs and the purposes of their designation.

The focus in AONBs (and other NPPF footnote 6 areas) should not be on setting and meeting abstract development targets, but on determining what homes (and other forms of development) are needed to support communities in those areas, and what the opportunities are to meet those needs without conflicting with the statutory purpose of conserving and enhancing natural beauty in these designated areas.

AONB Local Plans, as recommended in the Glover Review and referenced earlier in this response, offer an alternative and innovative way to balance these 2 objectives sustainably.

Proposal 5: Areas identified as *Growth* areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building.

Q9(b). Do you agree with our proposals above for the consent arrangements for *Renewal* and *Protected* areas?

Renewal Areas could include development in rural areas not classed as a Growth or Protected Area under the proposed system. This could include land on the edge of villages some of which may also be located within the setting of a Designated Landscape.

The Dedham Vale and Suffolk Coast & Heaths AONB team have some concerns about the statutory presumption in favour of development automatically being applied in Renewal Areas, in these circumstances. This concern is heightened, particularly if Permission in Principle (PiP) is extended to cover major sites, as proposed in this consultation and the recent Changes to the Planning System consultation.

With regards PiP, the Dedham Vale and Suffolk Coast & Heaths AONB team considers that the current system, where an adopted Local Plan is in place, provides sufficient certainty and flexibility for developers to bring development forward.

In Designated Landscapes, there are few circumstances where a greater level of flexibility in implementing a planning consent than is already available through the existing planning system may be seen as compatible with the statutory purpose of AONBs, to conserve and enhance natural beauty (or its setting), especially when the cumulative impacts of many such flexibilities are considered over time.

The Dedham Vale and Suffolk Coast & Heaths AONB team therefore recommend that Designated Landscapes, or land with the setting of AONBs are exempted from any expansion of the PiP regime.

Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology

Q10. Do you agree with our proposals to make decision-making faster and more certain? h

The Dedham Vale and Suffolk Coast & Heaths AONB team consider that having an adopted Local Plan in place provides certainty in terms of the level of development being planned and the location of new development. Speeding up the preparation of Local Plans and decision making while a desirable aim, must not be achieved through reduced consideration of the quality of the underlying data/evidence or the consultation processes underpinning the plan making and decision-making processes. The Dedham Vale and Suffolk Coast & Heaths AONB team has concerns about the changes being proposed particularly around environmental assessment. The proposal to shift to national and local environmental data sets to reduce the need for site specific surveys could be damaging to wildlife, both protected and non-protected species where these are negatively impacted by a development proposal. National and local data sets do have a role in the planning system, but it is not clear how they will be kept up to date. It is also not clear how mobile species will be considered if there is a shift away from site specific surveys as proposed in the consultation. Relying purely on national and local environmental data would not be appropriate or enough on their own to support sustainable plan making and decision making.

Digitising the Local Plan process is supported where it does not disadvantage those not willing or able to engage in online processes.

The Dedham Vale and Suffolk Coast & Heaths AONB team is already aware of this happening in the current Development Consent Order examination process for Sizewell C which due to COVID restrictions is now happening virtually. Some members of the public without access to suitable technology to access the documents, hearings etc have reported feeling very disengaged from the examination process. It is acknowledged that the planning system needs to evolve and make use of the best available technology however provision must be made to allow all people the ability to engage in the process, who want to engage.

Furthermore, public engagement at the strategic stage of Local Plan production is generally lower than at the detailed planning application stage. Front loading the system where community consultation is focused in the early stages of plan preparation as proposed, may have the opposite effect and result in less people getting involved.

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

Q13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

The Dedham Vale and Suffolk Coast & Heaths AONB team support the proposal to retain Neighbourhood Plans in the reformed planning system. Neighbourhood Plans can be an important part of the current planning process. They are prepared with extensive community input and consultation and are underpinned by local evidence and local knowledge which is used to identify local solutions to local problems.

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.

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

The Dedham Vale and Suffolk Coast & Heaths AONB team is fully supportive of any measures that would ensure that the quality of all new development coming through the planning process, generally, but more specifically within AONBs, is high quality and meets the statutory purpose of designation. Villages in the Dedham Vale and Suffolk Coast & Heaths AONBs play a key part in contributing to the scenic quality of the area, being historic in nature and with many timber framed buildings. It is essential that new design codes and development coming forward considers the existing built character and respects local built character and local distinctiveness. Locally influenced design codes could be one way to ensure that this happens.

Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.

While, the Dedham Vale and Suffolk Coast & Heaths AONB team is supportive in principle to changes to the National Planning Policy Framework that addresses climate change mitigation and adaptation measures, insufficient detail has been included in the consultation document to comment further in this point

Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.

The Dedham Vale and Suffolk Coast & Heaths AONB team has concerns about the proposal to simplify the process to assess the environmental impacts of plans as suggested in Proposal 16 of the White Paper. While such streamlining would speed up the plan making and decision-making processes, it may not automatically translate into the faster delivery of housing. The team has concerns that key environmental issues might not be properly considered, in the planning process if the environmental assessment process is over simplified.

Furthermore, it is not clear how this proposal aligns with the emerging requirement for developments to deliver 10% Biodiversity Net Gain, or the creation of Nature Recovery Networks where other environmental requirements are being simplified.

Finally, if the proposed approach is adopted, it is essential that the environmental aspects of sustainability are given equal weighting within the reformed planning system.

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.

Proposal 21 is seeking views on whether the reformed Infrastructure Levy should support the delivery of affordable housing.

In response to proposal 19, the Dedham Vale and Suffolk Coast & Heaths AONB team is concerned that a shift to this system would mean that those areas where less development is delivered would have less money to pay for much needed infrastructure.

In response to Proposal 21, the Dedham Vale and Suffolk Coast & Heaths AONB team is supportive of measures that would increase the delivery of affordable housing in AONBs that do not detract from the natural beauty of the designated landscapes. This cannot be at the expense of other infrastructure that may be needed to make a development sustainable or to support community needs.

The team also have concerns about the proposed introduction of First Homes into the affordable housing mix, as proposed in the recent Changes to the Planning System consultation

In the Changes to the Planning System consultation, a new policy was proposed to ensure that 25 % of all affordable homes built would be First Homes.

The addition of First Homes to the mix of housing “products” is welcomed in principle as part of the housing mix, especially in areas like the AONBs, where property values are particularly high, but the wages of many people working in the area’s communities are relatively low.

The mix of affordable housing products in an area, however, should be determined in response to an assessment of local housing needs, rather than centrally, otherwise it may fail to address the needs of the most vulnerable households

Mixing the concept of First Homes and affordable homes confuses the issue. The approach raises the question of what is affordable? First Homes (30% discount on market price) will still be only affordable to people on higher salaries while there will still be a demand for Affordable Homes for lower income families/groups.

It is currently possible for landowners to bring affordable houses forward in Protected Areas on Rural Exception Sites. There is a concern that some landowners may now hold back in bringing exceptions sites forward as they can make more money from First Homes sites affecting the delivery of much needed affordable homes in areas like AONBs. Where this happens the ability for LPAs to deliver much needed Affordable Homes could be a welcome solution. This would place a new financial burden on LPAs which would need to be recognised and appropriately financed.

Yours sincerely

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