



FOREST NEIGHBOURHOOD COUNCIL

Please reply to the Clerk:
Mrs M Vinall
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40 Rookwood Park
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E-Mail: fnc.horsham@sky.com

27th October 2020

We are **Horsham Forest Neighbourhood Council (FNC)** composed of elected volunteers, only the Clerk receives an honorarium. We represent the local community, but we have no precept. We rely on a small grant from Horsham District Council and so our resources are minimal. We receive notification of planning applications in our neighbourhood and comment on other Horsham applications which affect our constituents.

Depending on its implementation, the proposals in *Planning for the Future* White Paper will affect how Forest Neighbourhood Council is able to represent the local community.

INTRODUCTION, CHALLENGES

1 Our experience is that our local planning works well and, in our opinion, most delays in this District are due to developers delaying starting work after applications are approved and then delaying phases until a substantial part of the previous phase is sold. * see Increasing house building answer to Question 14

2 The White Paper seeks to computerise much of the planning process. The proposal to improve digital access and information and access is welcome. But there is still a need for a degree of traditionally based communication.

3 An emerging “PropTech” sector is referred to in the White Paper (para 1.11). The digital transformation of the property sector appears to be more concerned with selling houses than the planning process. Care must be taken not to exclude players in the planning process and thus reduce, not enhance, local involvement in local planning. At local level, reliance on computer technology will present financial problems.

4 We are pleased to see that Neighbourhood Plans are regarded as important and, under **Proposal 9** of the White Paper we note that you will support the use of digital tools. How will these be made available for local Neighbourhood Councillors and who will pay for them?

INCREASING HOUSE BUILDING

5 The White Paper recognises that there are fundamental issues in the system. Horsham District has a lack of affordable housing which is making life difficult for low income groups and starter households – especially local people on local salaries. There is a real danger that this proposal will actually take money away from affordable housing for three reasons:

- The money raised by the new developer levy has to be cut in too many different ways. The same pot is expected to provide for affordable housing, eco housing and even possibly for a cut in council tax. The latter is likely to lead to siphoning off of funds from areas of public good
- The emphasis on First Homes and the compulsion to provide a fixed number of First Homes in each development will reduce the money available for, say, homes for social rent. **But, to fix our local problem, it is the latter category. It is precisely homes for social rent which, as a category, has collapsed in the last 10 years. Social rent (Council Houses) must remain in local authority ownership in perpetuity. It should be recognised that the poorest paid members of our community will never own their own homes.**



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- **In the short term, the raising of the cap from 10-50 homes before the affordable housing obligation kicks in, discriminates disproportionately against rural districts (because their developments tend to be smaller) and should be cancelled.**

6 Affordable housing as agreed by the developer at the application stage is often not built. From the developers' point of view, it is more profitable for them to buy out the Council by paying for his affordable houses to be built elsewhere. In Horsham there is no 'elsewhere' because developers' land banks own developable land.

7 The mortgage industry, too, needs changes to help people buy homes. This may need government intervention, possibly through mortgages made available by local authorities on longer terms and at lower interest rates with preference given to local employees (as was done in the 1950s).

8* We agree with your Question 14 that there should be a stronger emphasis on the build-out of developments. There must be a major disincentive for developers to sit on their land banks. This will be difficult to enforce but is necessary if "the dam is to be breached".

CHANGE: Remove the fixed percentage of first homes, switch the whole emphasis of subsidy towards the low end of the sector and especially homes for social rent. Increase priorities for zero carbon building which are minimal in this proposal. Cancel the temporary raising of the cap to 50 homes.

PLANNING REFORMS

9 Our land supply is limited and, without destroying the very assets that make our area attractive, most of the sites are under option from developers. In a rural district like Horsham, most of our land area is agricultural. Although we have many lovely green spaces and woods, very little of it has an official designation such as ANOB. So, under the current system it would not be protected. It is therefore possible that we would be obliged to place as much as 85-90% of our entire land area into the 'Growth' category. This would effectively remove all our ability to control settlement spread and infrastructure provision. And because all land would then have planning permission in principle, it would raise the price of agricultural land beyond the means of farmers, which would seriously damage one of our major local industries.

CHANGE: We need the ability to choose for ourselves what goes in the Protected Zone, so that we can control the amount of land coming onto the market to a sensible level (e.g. 5%) and prevent unrestricted developments in the countryside

10 Presently Central Government is pressing Horsham District to take many more homes that can realistically be accommodated in the area. Developers do not have the resources to build all these houses in the time scales proposed. Houses presently being built by developers are not the types that are needed locally at affordable prices, so sales are slow. Thankfully, without the sales income, developers do not have the cash to build more or we would find ourselves in the same situation as Ireland a few years ago, with scores of empty, new unsold houses. The law of supply and demand breaks down if the buyer is too poor or the seller gets too greedy. The White Paper does not adequately address this scenario.

PLAN MAKING

11 Horsham District Council have put a lot of resources into preparation of the District Local Plan and we have participated in that process (para 1.16 et seq). If local people are to be involved in the Local Plan, there



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must be realistic time scales. Some organisations, such as ours, only meet monthly so a response requested in less than 8 weeks is usually difficult to meet.

12 Realistically, if Local Plans are to be reviewed every five years, this will require a dedicated team in the planning department of the local authority. This will be an additional cost to the authority.

13 The abolition of Section 106 and CIL is welcome. However, the lack of clarity around the replacement tax is alarming. We oppose the idea of a single nationally set rate as this is likely to discriminate in one direction or another. We also oppose delaying the payment right to the end of the build out process. With large estates this could be literally decades. Although we get the ability to borrow against the expected proceeds, this involves both risk and cost. One of the biggest faults in the current system is the long delay between building housing and the infrastructure that's supposed to support them. This proposal seems likely to make the situation worse, not better.

CHANGE: Specify the details of this levy, ensure it goes where it is needed most and phase at least some of the proceeds over the near term.

DUTY TO COOPERATE

14 Horsham is seriously affected by its duty to cooperate (with neighbouring local authorities) (White Paper para 2.52.2). The adjacent Borough of Crawley includes Crawley New Town and much of Gatwick Airport. Most of it is now built up and urban in nature and it claims to be fully 'built up'. As a result, Horsham is being required to accommodate many more houses that should 'belong' in Crawley. This will have detrimental effect on the character of Horsham.

15 Also adjacent to Horsham is the South Downs National Park where, again, housing development is limited and, consequently, Horsham is being required to build more homes than would otherwise be required.

16 Perhaps it is now time to make this part of South-East England a Protected Area under the proposals in the White Paper (para 2.35) and channel development to the North of England where it is needed.

DESIGN

17 (Para 3.1 et seq) We have worked with a local amenity society on local character assessments and a design guide. It is a difficult topic because so much is a matter of opinion. What can be agreed is minimum standards for new build and conversion/renovation. We need a new 'Parker Morris' standard that sets out the minimum requirements in terms of room sizes and household facilities (including outdoor space). We look forward to the publication of a National Model Design Code.

18 Proposal 18 looks to greater energy efficiency. Lower CO₂ emissions are important but so, too, are insulation standards. These can involve extra costs and developers may claim that this further reduces their ability to build affordable homes.

19 The White Paper puts great emphasis on raising design standards. But local authorities are very poorly equipped to provide meaningful expertise in this area. What's more, the public find it hard to understand or engage with design questions. If this is to be the main opportunity for public involvement instead of what gets built where, it looks like a poor substitution. Fundamentally we question how successfully the general public can engage with architectural design.



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CHANGE: Increase national standards for building and design to set a much higher benchmark than we have at present

20 'Sustainability' (Question 16) is a much used word in planning circles. This needs to be specifically defined in this document.

INFRASTRUCTURE

21 If Infrastructure is not to be provided by statutory undertakers or local authorities then it must be provided by the developers. These are long-lasting assets which will be in use for years after the developer has left.

22 The proposal has minimal clarity on how to solve the infrastructure deficit that plagues our area, and which is the single biggest cause of local protest. When you build housing on the scale that we're doing in Horsham District, the ordinary monies we get from Section 106 and Cil are hopelessly inadequate. Our population is set to rise by 50% if we meet government targets. We need entire new railways, trunk roads, sewage farms, hospitals etc. It's impossible to extract that kind of money from the developers. It can only come from central government. We're being asked to accept all the houses without anything like the necessary support.

CHANGE - the government must provide serious central funds for areas which, like Horsham District, are expected to provide extreme levels of growth.

23 There have been instances in this area where a developer has left certain infrastructure developments until the end of the build-out and then claimed poverty. Under the current arrangements, community facilities (e.g. village hall, school, medical centre), should be built at the same time as the surrounding residential properties so that, from the start, the new community can establish itself. It is probably better if the infrastructure is actually provided by the developer than in the form of a cash contribution. If it is done by levy, this should be paid early on in the development or by staged payments so that the relevant infrastructure can be provided as the new community grows rather than waiting to be provided until after the development is complete.

24 Some infrastructure may be remote from the development site (e.g. Highway improvements or remote community facilities) but these should not have to wait to be provided until after the development is complete.

25 It is an anomaly (in Proposal 21) that affordable housing be regarded as part of infrastructure. If there is an obligation to provide affordable homes (however defined) as part of the development then that is it. The tenure is a different matter.

26 As far as Council Houses are concerned (not necessarily the same as Affordable Homes) it might be better for the developers to pass the land to the Council who can then build what is needed.

IMPACTS

27 As FNC is composed of volunteers we can report that it is exceedingly difficult to encourage certain demographic groups to become involved in local government matters (para 6.5 et seq). In our opinion, it is not technical jargon and traditional models of community engagement that put some people off. It is rather



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that they have other interests which they perceive as having higher priority; the welfare of their family, working commitments, day-to-day travel.

MHCLG White Paper: *Planning for the Future* FNC responses to Questions

Question	Answer
1	Fair, democratic
2	Yes
3	We are generally consulted about applications in our area by Horsham District Council and this should continue
4	Protection of Green spaces/Increasing affordability of housing/Design of new homes and places/More or better local infrastructure/Protection of existing heritage buildings or areas. We need the ability to choose for ourselves what goes in the Protected Zone so that we can control the amount of land coming onto the market to a sensible level (e.g. 5%) and prevent unrestricted development in the countryside
5	If local people are to decide on the nature of development in their community there still needs to be dialogue with developers. The proposed changes would not streamline this part of the process.
6	Option 3, i.e., flexibility to set policies except those which duplicate NPPF.
7a	No, sustainable development is not well defined
7b	If external (I e, national Government) pressure on housing numbers were removed, cooperation could be achieved voluntarily.
8a	Please define 'Standard method'
8b	Affordability is a local problem. We are in a place where there is real danger from the extension of existing urban areas
9a	No
9b	No
9c	What is 'Nationally Significant Infrastructure Projects'? This should have been the subject of a footnote in the White Paper. If, as we think, it refers to Airport Runways, etc we do not think that housing developments should be dealt with in the same way.
10	No, traditional paper based communications should NOT be abandoned altogether.
11	No, traditional paper based communications should NOT be abandoned altogether.
12	If this target is really to be met it will require additional resources. Will Government fund these?
13a	Yes although not all NP's deal with development
13b	Digital technology is not universal enough to be relied on for this purpose. It is difficult to identify the subtleties of design and local character
14	Yes, see our comment 8
15	Most new houses are OK, some flats are too small (need for minimum standards) Gardens are generally too small for families. Some permitted Development conversions are awful and should have been prevented.
16	More space for cars to allow for access. More green and open spaces, more trees, energy efficient buildings.
17	In principle, Yes
18	Yes, but can we afford it?
19	Not sure



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20	Not sure
21	cf Q4; Green space/affordability/adequate infrastructure/design
22a	No The Government must provide serious central funds for areas which, like Horsham District, are expected to provide extreme levels of growth
22b	No
22c	No, each development should pay for its own infrastructure
22d	No, not necessary; Infrastructure should be paid for by developers.
23	No, permitted developments should pay their way in infrastructure terms
24a	Yes, if not more
24b	Either
24c	No
24d	Compliance with standards
25	Yes
25a	Must be relevant to the particular development
26	We have reservations about Proposal 14 and the dangers that all local developments will look the same. Increase national standards for building and design to set a much higher benchmark than we have at present



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MHCLG White Paper: *Planning for the Future* FNC responses to Proposals

Proposal	Response
2.6	In general we think that the present system is working reasonably well and the proposals in this White Paper will not improve matters(even for developers).
1	The White Paper gives no idea of the size or extent of these three types of land (areas). See paragraph 18 of our comments.
2	We will need to see the proposed form of these Development management policues before commenting.
3	Sustainability is not well defined.
4	Divert developers of their land banks. National long term plans should rethink the eventual outcome of pressure on the South East.
5	We need to understand the physical extent of these Areas
6	Digital technology is not universal enough to be relied on for this purpose.
7	Digital technology is not universal enough to be relied on for this purpose.
8	There must be sanctions for developers, too. They are part of the home-delivery process
9	Good
10	Yes, but is there an adequate supply of local craftsmen to build, whatever type?
11	Good
12	We welcome this proposal but where will the money come from for another experienced officer locally?
13	Not sure
14	Worried about yet another 'permitted development'.
15	Not sure
16	Not sure
17	Good
18	This will increase house prices.
19	No. Costs are different in different oarts of the country
20	Permitted developments should pay their way in infrastructure terms
21	Affordable and 'Council' Housing shpuld not be regarded as infrastructure. It is housing just like the main development.
22	Yes
23	Agreed but reservations about 'PropTech' (see Para 7 of our comments)
24	Agreed