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28 October 2020

**THE GOVERNMENT PLANNING WHITE PAPER “PLANNING FOR THE FUTURE” AND  
CHICHESTER DISTRICT COUNCIL’S HELAA (HOUSING AND ECONOMIC LAND AVAILABILITY  
ASSESSMENT) WILL DESTROY VILLAGES**

**STATEMENT FROM KIRDFORD PARISH COUNCIL**

The much-awaited proposals to change the existing planning system have finally arrived, with a particular interest as a small rural community in enhanced local democracy and accountability. Following the ‘Localism Act 2011’, Kirdford was the first parish in the Chichester District to complete a referendum and have our Neighbourhood Plan adopted.

Whilst the government white paper sets out admirable objectives like “... building homes in the right place” and ensuring the developments are “... sustainable, beautiful, safe and useful”, the proposed changes in the planning system effectively remove any form of local oversight on development plans and instead prioritises fast and furious development anywhere where land is made available. As it stands, this is not at all the direction rural communities can sustain.

The white paper also contains contradictions; whilst it seeks to “... support sustainable growth in all parts of the country”, it also says two lines later “... delivering opportunities for the construction industry”. Recent figures seem to indicate that the construction industry is sitting on planning consent for some 180,000 homes which has not yet been started. This hardly seems to be an industry that requires more opportunity.

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The government seems fixated on delivering numbers and this white paper is the mechanism to achieve it! The white paper seems clearly designed to ensure that it is achieved at any cost. The wrong type of houses, in the wrong place, are of no use to anyone. Whilst the language in the white paper when it comes to planning provisions are direct and unambiguous, when the white paper addresses more material issues around viability, sustainability and need, the language is more directional. "We will seek..." feels as though it is trying to throw a camouflage net over a division of tanks.

There are some positive and powerful ambitions in the White paper. Section 1.12 of the white paper makes several powerful statements that enforce local democracy; "... move democracy forward, increase land supply where it is needed, promote stewardship of our precious countryside, creating a virtuous circle of prosperity in our villages, towns and cities, supporting their ongoing renewal and regeneration without losing their human scale, inheritance and sense of place." The white paper needs to go further and protect the rate at which a rural setting should be expected to grow in a given planning period, irrespective of land made available by profiteering landowners.

The recent Chichester District Council HELAA report clearly illustrates the direct targeting of villages with a 'loose cannon, shock and awe' approach to housing estimates. In their 2018 HELAA report there was a provision made to meet 7,917 dwellings for the period up to 2035, with no allocation for our parish. Now, the 2020 HELAA report has a provision for 26,383 dwellings for the period up to 2037 with 542 dwellings allocated to our parish, more than doubling the size of the village over a very short period.

Section 4.9 of the White paper proposes to change the CIL (Community Infrastructure Levy) turning it into a fixed fee above a threshold. It makes no mention of the threshold, which would be key to determining if this is an acceptable proposal or not. It also proposes to delay the payment of the CIL contribution by developers; instead shifting the burden of infrastructure investment ahead of a completed development to a loan scheme for local authorities. This, we note, is not mandatory, which can therefore leave important infrastructure needs being delayed or ignored. We do, however, welcome section 4.19 where a provision to apply a levy on 'change of use' applications and new builds would be enforced.

Section 4.22 seems a step back from today's policy which ensures that developers have to deliver 30% of a scheme as affordable homes on developments over a certain size. Offsetting the discounted value of affordable homes being allocated for housing associations, versus the market rate, simply misdirects the CIL fee to ensure developers are not out of pocket. We do not see this adds anything useful to the existing arrangement.

Section 4.24 makes a strong argument; we agree that the quality of homes going to social housing should not be of a reduced quality than one which is prepared for the open market. This should not be left to local negotiations, but instead be made a condition of development. It is in line with the mixed community model of weaving social and market housing into new communities and goes a long way to meeting the sustainability and home efficiency targets set by the government. We should not be making households, who can least afford it, pay more for fuel bills because they have been provided with a sub-standard property.

In section 5, the white paper signals a change in how “local housing need” is calculated, but offers no detail on the calculation and considerations being applied, for example, the impact of Brexit. It also seeks to raise by 500% the threshold below which developers are not required to contribute to affordable housing numbers. This is a ridiculous proposal and would significantly impact small rural communities who may only have small parcels of land available and for whom affordable housing is a requirement. From experience of the recent Chichester HELAA document, our LPA is eager to seek and include agricultural land offered by land owners looking to sell up, providing more significant parcels of land on which even bigger developments can be built, so the District Council can meet affordable housing and social housing targets. There is also no mention of the valuable role Community Land Trusts can play in the community. This will swallow up villages and destroy rural communities, let alone impact further our dwindling agricultural capacity.

The government needs to address a clear provision for areas which lie close to district boundaries. These areas are particularly at risk of overdevelopment as there is no joined up working for planning activities between districts. A good example of this is Billingshurst, where a massive development is underway to deliver in excess of 500 homes less than 6 miles away, the impact of which is not considered by Chichester District Council. Another example is a development at nearby Alfold, also not considered and is struggling to sell.

As it stands, this white paper presents a national threat to villages and rural communities across England. We the People are best positioned to implement government policy based on local needs and national objectives, but this white paper lacks clarity as to how “...enhanced local democracy and accountability” empowers us to achieve this.

**Lynne Brooks**

**Clerk & RFO**

**On behalf of Kirdford Parish Council**