

# WEST MALLING PARISH COUNCIL

MINUTES OF A MEETING OF THE  
PLANNING COMMITTEE  
HELD ON 28<sup>TH</sup> NOVEMBER 2017, 7.30PM  
AT VILLAGE HALL, NORMAN ROAD, WEST MALLING

**Present:** Cllr. Richard Byatt  
Cllr. Ben Merchant  
Cllr. Yvonne Smyth

Cllr. Min Stacpoole

| Minute |   | Action by | Action | Response |
|--------|---|-----------|--------|----------|
| 17/664 | <b>APOLOGIES FOR ABSENCE</b> were received from Cllr. Bullard   |           |        |          |
| 17/665 | <b>DECLARATIONS OF INTEREST</b> - Cllr. Byatt expressed an interest in application <b>TM/17/02936/FL</b> – 53 Swan Street West Malling ME19 6LW as he is a direct neighbour.  |           |        |          |
| 17/666 | <b>MINUTES</b> of the meeting held on 24 <sup>th</sup> October 2017 - were approved and signed.   |           |        |          |
|        | <b>MATTERS ARISING</b> from the minutes, not otherwise on the agenda.<br><br><b>(17/615) Permitted Development applications</b> – Clerk produced the most recent guidance (West Malling Conservation Area Appraisal) on design and character for West Malling which was produced by T&MBC in 2002. It was noted that the design guidance pre-dates the introduction of Permitted Development applications and it was agreed that advice be sought from T&MBC as to how the guidance is applied to Permitted Development applications.   | Clerk     |        |          |
| 17/667 | <b>TMBC LOCAL PLAN</b>  |           |        |          |
| 667.1  | Cllr. Dean is in discussions with Ian Bailey of T&MBC to determine if West Malling Parish Council are able to put forward any additional information at this stage and if so, to determine timelines.   |           |        |          |
| 667.2  | West Malling Parish Council has responded to the Department for Communities & Local Government Consultation – ‘Planning for the right homes in the right places.’ See attached.   |           |        |          |
| 667.3  | Forty Acre Fields – no formal planning application has yet been made, but meetings have been held between Wates Construction, members of the T&MBC planning department and Borough Councillors (at a separate meeting) to discuss the potential development of the land at Hermitage Farm, Winterfield Lane. This land had formed part of the Call for Sites exercise (for 125 dwellings) and was assessed as ‘suitable and deliverable’ but the site had not been included in the Way Forward document or consultations. Under new proposals the site has been extended to a minimum of 250 dwellings. Cllr Byatt has asked Ian Bailey of T&MBC to confirm which planning policies would apply to any application that were to be submitted.<br><br><i>[Subsequent to the meeting, the following response was received:<br/>“The site is outside of the built confines of existing settlements so I would assume that the first policy consideration would be CP14 in the adopted Core Strategy (development in the countryside). Other policies would also be considered depending on the proposal (number of</i> |           |        |          |

|               |  |   |  |  |
|---------------|--|---|--|--|
|               | <i>houses, access arrangements etc) for example the traffic impacts, but as you say it is speculative in the absence of a planning application.”]</i>  |   |  |  |
| <b>17/668</b> | <b><u>WEST MALLING NEIGHBOURHOOD PLAN</u></b>  |   |  |  |
|               | <p>Funding: <a href="https://mycommunity.org.uk/take-action/neighbourhood-planning/support-grants/">https://mycommunity.org.uk/take-action/neighbourhood-planning/support-grants/</a><br/>                     Funding options include a grant up to the sum of £9000 to assist with the costs of preparing a Neighbourhood Plan.<br/>                     The funding programme is from 2015 – 2018 with the deadline for pre-Christmas applications being Friday 15<sup>th</sup> December. It is expected that grants will continue after March 2018 but this has not been confirmed.<br/>                     General discussion regarding applying for funding and in principle it was agreed that subject to checking eligibility, members would explore the possibility of applying for a small initial amount of funding to assist with costs incurred during the exploratory stages of the Neighbourhood Plan.</p> <p>Further consideration to be given to title and timeframe for the plan; there was a general agreement that a shorter, timeframe may be more beneficial.</p> <p>Cllr. Byatt has asked consultant Jim Boot and Tessa O’Sullivan (Action with Communities in Rural Kent) to speak at a Planning Committee meeting; currently awaiting convenient dates. [Subsequent to the planning meeting, Tessa O’Sullivan confirmed that she could attend the planning meeting to be held on 23<sup>rd</sup> January 2018]</p> | <p><b>ALL</b></p> <p><b>ALL</b></p> <p><b>RB/<br/>Clerk</b></p> |  |  |
| <b>17/669</b> | <b><u>PLANNING APPLICATION – NEW BUILDING APPROVALS</u></b>  |   |  |  |
| <b>669.1</b>  | <p><b>TM/17/02608/FL</b>– 7 Epsom Close West Malling ME19 6NX Demolition of chimney. Loft conversion with rear dormer window and 3 roof lights to front elevation</p> <p>Granted</p> <p><i>[West Malling Planning Committee had had no objections]</i></p>   |   |  |  |
| <b>669.2</b>  | <p><b>TM/17/02224/FL</b> – 281 London Road West Malling ME19 5AE Extension, alteration &amp; conversion of existing bungalow to form x2 two to three bedroom two storey semi-detached dwelling houses and the erection of a x1 new two bedroom bungalow with associated access, parking and turning.</p> <p>Granted</p> <p><i>[West Malling Planning Committee had objected to this application]</i></p>   |   |  |  |
| <b>17/670</b> | <b><u>PLANNING APPLICATION REFUSALS</u></b>  |   |  |  |
|               | <p><b>TM/17/00506/OA</b> - Outline Application: Land rear of 239-259 London Road West Malling The development of land to the rear of London Road to consist of the development of an extra care development of 79 units (comprising of apartments and cottages) all within Use Class C2; associated communal facilities; provision of vehicular and cycle parking together with all necessary internal roads and footpaths; provision of open space &amp; associated landscape works &amp; ancillary works and structures.</p> <p>Refused</p> <p><i>[West Malling Planning Committee had objected to this application]</i></p>   |   |  |  |
| <b>17/671</b> | <b><u>TREE APPLICATION APPROVALS</u></b>   |   |  |  |
| <b>671.1</b>  | <p><b>TM/17/02696/TNCA</b> - Gundulfs Meadow 181 Offham Road West Malling ME19 6RF T1 Eucalyptus – fell to approx. 2 ft in height. T2 Oak – removal of one limb and deadwood.</p> <p>Granted</p>   |   |  |  |

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|---------------|---|--|--|--|
|               | <i>[West Malling Parish Council had supported this application]</i>   |  |  |  |
| <b>671.2</b>  | <p><b>TM/17/02690/TNCA</b> - 21 Police Station Road West Malling Cypress trees and mixed hedge – trim back to boundary to suitable growth points.</p> <p>Granted</p> <p><i>[West Malling Parish Council had supported this application]</i></p>   |  |  |  |
| <b>671.3</b>  | <p><b>TM/1702446/TPOC</b> - 101 St Leonards Street West Malling ME19 6PE. Removal &amp; reduction of trees identified as contributing to structural problems to cottage.</p> <p>Granted with conditions</p> <p><i>[West Malling Parish Council had supported this application]</i></p>  |  |  |  |
| <b>17/672</b> | <b><u>BUILDING PLANNING APPLICATIONS</u></b>  |  |  |  |
| <b>672.1</b>  | <p><b>TM/17/02936/FL</b> – 53 Swan Street West Malling ME19 6LW Demolition of garden shed and erection of replacement shed.</p> <p>The Planning Committee commented as follows:</p> <p><i>West Malling Parish Council Planning Committee met on the 28<sup>th</sup> November to discuss this planning application and has decided that it supports this application.</i></p>  |  |  |  |
| <b>672.2</b>  | <p><b>TM/17/02993/FL</b> - 23 Offham Road West Malling ME19 6RB Single storey rear extension</p> <p>The Planning Committee commented as follows:</p> <p><i>West Malling Parish Council Planning Committee met on the 28<sup>th</sup> November to discuss this planning application and has decided that it supports this application.</i></p>   |  |  |  |
| <b>672.3</b>  | <p><b>TM/17/02992/FL</b> - 25 Offham Road West Malling ME19 6RB Single storey rear extension</p> <p>The Planning Committee commented as follows:</p> <p><i>West Malling Parish Council Planning Committee met on the 28<sup>th</sup> November to discuss this planning application and has decided that it supports this application.</i></p>   |  |  |  |
| <b>672.4</b>  | <p><b>TM/17/03189/OA</b> - The Old Startled Saint 120 Teston Road West Malling ME19 6PQ Outline Application A new detached two storey dwelling</p> <p>The Planning Committee commented as follows:</p> <p><i>West Malling Parish Council Planning Committee met on the 28<sup>th</sup> November to discuss this planning application and has decided that it supports this application. However, the committee are concerned about the rationale of self-build being used by the applicant and whether this might serve as a precedent in the future for this site and other sites.</i></p> |  |  |  |
| <b>17/673</b> | <b><u>TREE PLANNING APPLICATIONS</u></b>  |  |  |  |
| <b>673.1</b>  | <p><b>TM/17/03187/TNCA</b> - 4 New Barns Oast 142 Lavenders Rd West Malling ME19 6HR To reduce the trees on the boundary of No 4 New Barns Oast</p> <p>The Planning Committee commented as follows:</p> <p><i>West Malling Parish Council Planning Committee met on the 28<sup>th</sup> November to discuss this planning application and has decided that it supports this application.</i></p>  |  |  |  |
| <b>673.2</b>  | <p><b>TM/17/03200/TNCA</b> - 3 New Barns Oast 144 Lavenders Rd West Malling ME19 6HR Row of 5 Poplar trees to re-pollard back to previous points and remove any major deadwood; 3 Wild</p>  |  |  |  |

|        |  |       |  |  |
|--------|--|-------|--|--|
|        | <p>Cherry trees to remove deadwood and thin; 1 dead Cherry tree to fell to ground level</p> <p>The Planning Committee commented as follows:</p> <p><i>West Malling Parish Council Planning Committee met on the 28<sup>th</sup> November to discuss this planning application and has decided that it supports this application.</i></p>   |       |  |  |
| 17/674 | <b><u>PLANNING ENFORCEMENT</u></b>   |       |  |  |
| 674.1  | <p><b>Current investigations:</b></p> <p>Condition of <b>Arundel House, High Street</b> – Clerk reported that following the recent high winds the plastic sheeting on the scaffolding had become loose in places; this had been reported to KCC. Parish Council to continue to monitor progress.</p>   |       |  |  |
| 674.2  | <p><b>Martins newsagents, High Street</b> – TMBC have requested that the new Conservation Officer (Tunbridge Wells BC Officers on partnership basis) look at the property and report back as to whether any work has been undertaken. As of today's date, the Parish Council have not been updated as to progress. Clerk to write to TMBC to chase response.</p>   | Clerk |  |  |
| 674.3  | <p><b>17 Police Station Road</b> – It was noted by a T&amp;MBC enforcement officer that part of the front wall has been removed to enable an additional car to be parked off road; the Clerk has asked if this would require retrospective planning permission as taking the wall down would appear to be outside the granted planning permission.</p> <p>Clerk to chase response.</p>   | Clerk |  |  |
| 674.4  | <p><b>Potential new investigations:</b></p> <p><b>Land rear of 56 Town Hill</b> – the land to the rear of 56 Town Hill is currently being developed; a neighbour raised concerns with the Parish Council that when services were laid in the driveway, a mechanical digger and rotary saw were used (rather than mole digging) which could cause long term damage to the protected trees along the driveway.</p> <p>The Parish Council had attempted to speak with the tree warden at T&amp;MBC however, was unable to make contact before the work was completed; T&amp;MBC tree warden subsequently confirmed that the developers were aware of the importance of the trees. It was agreed that the situation was unsatisfactory and that it would be not until Spring before we would know if the trees have been damaged.</p>  |       |  |  |
| 17/675 | <b><u>CONSERVATION OFFICER</u></b>   |       |  |  |
|        | <p>Due to the retirement of its Conservation Officer, T&amp;MBC now only have 'limited access' to a Conservation Officer who is based at Tunbridge Wells Borough Council; T&amp;MBC planning officers make a decision on a case by case basis as to whether or not they need to seek the advice of staff in Tunbridge Wells. Due to the number of listed buildings within West Malling, members are concerned about this limited access to such planning expertise.</p> <p>It was agreed that the situation be monitored in the short term and that an eye is kept on applications where the input of the Conservation would be expected.</p> <p>Clerk to also speak with other Parishes</p>   | Clerk |  |  |
| 17/676 | <b><u>COMMUNITY RIGHTS</u></b>   |       |  |  |
|        | <p>See link to the Department for Communities &amp; Local Government guidance.<br/> <a href="https://www.gov.uk/government/publications/youve-got-the-power-a-quick-and-simple-guide-to-community-rights/youve-got-the-power-a-quick-and-simple-guide-to-community-rights">https://www.gov.uk/government/publications/youve-got-the-power-a-quick-and-simple-guide-to-community-rights/youve-got-the-power-a-quick-and-simple-guide-to-community-rights</a></p> <p>Cllr. Merchant had researched the information provided by the Department for Communities &amp; Local Government and it was agreed that some of the community rights linked naturally with the aims and objectives of the Neighbourhood Plan. All of the rights should be borne in mind for future projects including the right to reclaim land and buildings as well as having the right to challenge local government to take over services if it is felt that the local government department are not carrying out the service to a satisfactory level.</p> |       |  |  |

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| <b>17/677</b>          | <b><u>FLYPOSTING</u></b>  |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
|                        | Following a spate of recent flyposting in the High Street (in particular on the railings by the crossing), members are concerned that the flyposting may get progressively worse.<br>Clerk to speak with KCC for some clarification as to their powers to deal with the issue.  | <b>Clerk</b>   | <b>✓</b> |   |                       |       |  |                    |         |  |              |                |  |  |  |
| <b>17/678</b>          | <b><u>DRAFT BUDGET</u></b>  |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
|                        | <p>General discussion regarding draft budget and in particular Parish Online (mapping service, currently in F&amp;GP budget).</p> <p>Budget to be further considered</p> <p>Expenditure:</p> <table border="0"> <tr> <td>Neighbourhood planning</td> <td>£250.00</td> <td>Advisors expenses; training; initial consultation</td> </tr> <tr> <td>Digital map of parish</td> <td>72.00</td> <td></td> </tr> <tr> <td>TCPA subscription*</td> <td>£110.00</td> <td>Covers 4 people. Monthly journal; discounted training.</td> </tr> <tr> <td><b>Total</b></td> <td><b>£432.00</b></td> <td></td> </tr> </table> <p>To be noted for Full Council agenda (discussions on draft budget).</p> | Neighbourhood planning                                 | £250.00  | Advisors expenses; training; initial consultation | Digital map of parish | 72.00 |  | TCPA subscription* | £110.00 | Covers 4 people. Monthly journal; discounted training. | <b>Total</b> | <b>£432.00</b> |  |  |  |
| Neighbourhood planning | £250.00   | Advisors expenses; training; initial consultation      |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
| Digital map of parish  | 72.00   |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
| TCPA subscription*     | £110.00   | Covers 4 people. Monthly journal; discounted training. |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
| <b>Total</b>           | <b>£432.00</b>  |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
| <b>17/679</b>          | <b><u>QUESTIONS FROM MEMBERS OF THE PUBLIC</u></b><br>none  |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
| <b>17/680</b>          | <b><u>QUESTIONS FROM COUNCILLORS</u></b><br>None  |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
| <b>17/681</b>          | <b><u>TMBC AREA 2 PLANNING COMMITTEE</u></b>  |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
|                        | Next meeting date is the 13 <sup>th</sup> December 2017. The agenda has not yet been distributed.<br>Discussion regarding the future attendance at Area 2 for members of the Planning Committee.  |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
|                        | <b>Date of next meeting:</b> Tuesday 19 <sup>th</sup> December 2017 at West Malling Village Hall.   |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |
|                        | <p>There being no further business, the Chairman thanked members for attending and closed the meeting at 9.02 pm</p> <p>Signed.....</p> <p>Date.....</p>  |  |          |   |                       |       |  |                    |         |  |              |                |  |  |  |

**Department for Communities & Local Government Consultation – ‘Planning for the right homes in the right places.’**

WMPC welcomes the Government’s decision to consult on a new approach to housing provision but feels that the proposed methodology for calculating housing need will undermine the work of local authorities to date; would increase development in areas where both land and infrastructure are under intense pressure and risks making the situation worse by encouraging the building of the wrong sort of homes in the wrong places.

The White Paper argues that the current approach to assessing housing need is “too complex.” This is because the factors determining housing need in any particular area are complex and a “simple, standard approach”, whilst superficially attractive, cannot take account of all these factors and may well produce perverse outcomes.

We do agree that taking account of affordability is important. However, the proposed methodology is based on the assumption that simply increasing the number of houses in an area will reduce prices and therefore increase affordability.

In areas such as West Malling demand is almost limitless. The area attracts people moving out of London, taking advantage of high prices in the capital to “trade up”. To date new housing has not been built with a view to accommodating the demands of the local population at “affordable” prices.

In our own area, the proposed methodology would see an increase of over 23% on the housing target included in the draft Local Plan currently going through public consultation.

As the table provided as part of the consultation records, 77% of Tonbridge & Malling is designated either Green Belt, AONB or SSSI, a higher percentage than South Lakeland District Council in Cumbria. This severely limits where new housing can go.

The Borough Council has spent considerable time and effort explaining and consulting on its Local Plan proposals, including housing targets. Parish Councils and other community organisations have expended similar effort. Moving the goal posts at this late juncture will undermine public confidence in the planning system and in the process of consultation itself.

We note that the Government wants to see areas working together and we suggest that dictating housing need on a district by district basis is not the way to achieve this. More planning on a regional and national scale is needed.

We welcome the intention to consider housing types and tenure, as opposed to simply the number of units, when assessing need.

WMPC also welcomes the emphasis on “high quality, well-planned” homes but would like to see more detail on how this commitment can be delivered through the planning system.

**Planning fees**

The White Paper proposes that “local planning authorities delivering the homes their communities need might be eligible for a further 20 per cent increase in fees for planning applications, over and above the 20 per cent increase already confirmed”.

This appears to be a straightforward “bribe” to local authorities facing funding shortfalls and could have a distorting effect on planning decisions. Additionally, if planning authorities are under resourced and struggling to deliver their housing needs as a consequence, it seems counter intuitive to only offer this incentive to those who are managing to do so.

**Neighbourhood Planning**

In principle the proposal to amend national policy so that local planning authorities are expected to provide neighbourhood planning groups with a housing need figure, seems a good idea but in practice the sequencing of local and neighbourhood plans will make this difficult.

A formula apportioning housing need to localities based on land area or population is too simplistic. Parish Councils should be free to work with local authorities to determine housing needs within a Neighbourhood Plan area.

**Question 1:**

a) do you agree with the proposed standard approach to assessing local housing need? If not, what alternative approach or other factors should be considered?

No. The standard approach would require an increase of 23% on the Objectively Assessed Need figure of 696 dwellings per year. Over the 20 years of the Local Plan period this is 3,260 homes. Not only would this strain local infrastructure and services to breaking point, it would damage quality of life and is also undeliverable.

Using Household Growth as the baseline has the perverse effect of driving more development to areas that have already accommodated large increases in housing.

Although we welcome the introduction of an affordability measure into the standard approach, the argument that increasing supply will reduce prices is flawed. In areas like Tonbridge & Malling, close to London, building more homes tends to simply encourage more inward migration from the capital.

A definition of “affordable homes” at 80% of market rate will do nothing to help those in need of genuinely affordable housing.

b) how can information on local housing need be made more transparent?

n/a

**Question 2:** do you agree with the proposal that an assessment of local housing need should be able to be relied upon for a period of two years from the date a plan is submitted?

Yes - this seems reasonable but if the figure can be challenged and changed during examination it seems a little academic.

**Question 3:** do you agree that we should amend national planning policy so that a sound plan should identify local housing need using a clear and justified method?

Yes but as far as we know this is currently the practice of local authorities. A “standard approach” ignores important regional and local differences.

Para 56 of the consultation document states:

“Local planning authorities need to plan together to ensure that infrastructure and public services are planned to meet the needs of the wider area; to ensure that the combined impact on the environment is sustainable; to ensure that housing requirement that simply cannot be met in a particular area is met elsewhere; and where appropriate, to ensure that new settlements and garden villages are planned for properly.”

We think that this approach should be broadened to a regional and national level. “National planning policy” does not seem to include a realistic assessment of which parts of the country can accommodate large increases in housing (and indeed might welcome them as part of regeneration efforts such as the much vaunted Northern Powerhouse) and those areas that cannot.

**Question 4:** do you agree with our approach in circumstances when plan makers deviate from the proposed method, including the level of scrutiny we expect from Planning Inspectors?

No. It is unclear why “plan makers may put forward proposals that lead to a local housing need above that” given by the standard method but “there should be very limited grounds” for proposing a lower level of need. Local planners should be able to assess need on a rational basis that responds to the local context.

**Question 5:**

a) do you agree that the Secretary of State should have discretion to defer the period for using the baseline for some local planning authorities? If so, how best could this be achieved, what minimum requirements should be in place before the Secretary of State may exercise this discretion, and for how long should such deferral be permitted?

Yes, where a local authority can demonstrate that it has produced a plan which meets the current objectively assessed housing need and has been the subject of proper public consultation, it should be permitted to complete the plan making process if this can reasonably be achieved within 9 to 12 months.

b) do you consider that authorities that have an adopted joint local plan, or which are covered by an adopted spatial development strategy, should be able to assess their five year land supply and/or be measured for the purposes of the Housing Delivery Test, across the area as a whole?

n/a

c) do you consider that authorities that are not able to use the new method for calculating local housing need should be able to use an existing or an emerging local plan figure for housing need for the purposes of calculating five year land supply and to be measured for the purposes of the Housing Delivery Test?

n/a

**Question 6:** do you agree with the proposed transitional arrangements for introducing the standard approach for calculating local housing need?

No. In the case of Tonbridge & Malling it will delay submission of a Local Plan that has already consumed considerable time and money and been the subject of extensive public consultation. This Parish Council and other community organisations have expended similar effort. Moving the goal posts at this late juncture will undermine public confidence in the planning system and in the process of consultation itself.

**Question 7:**

a) do you agree with the proposed administrative arrangements for preparing the statement of common ground?

No. It seems unnecessarily prescriptive and does not allow for the complexity of local authority boundaries and housing market areas.

b) how do you consider a statement of common ground should be implemented in areas where there is a Mayor with strategic plan-making powers?

n/a

c) do you consider there to be a role for directly elected Mayors without strategic plan-making powers, in the production of a statement of common ground?

n/a

**Question 8:** do you agree that the proposed content and timescales for publication of the statement of common ground are appropriate and will support more effective co-operation on strategic cross-boundary planning matters?

n/a

**Question 9**

a) do you agree with the proposal to amend the tests of soundness to include that:

i) plans should be prepared based on a strategy informed by agreements over the wider area; and  
ii) plans should be based on effective joint working on cross-boundary strategic priorities, which are evidenced in the statement of common ground?

b) do you agree to the proposed transitional arrangements for amending the tests of soundness to ensure effective co-operation?

n/a to both

**Question 10:**

a) do you have suggestions on how to streamline the process for identifying the housing need for individual groups and what evidence could be used to help plan to meet the needs of particular groups?

We welcome the intent to disaggregate total housing need but feel the approach to assessing the housing needs of different groups has been too simplistic, fails to recognise that these needs overlap and can produce "segregation" which does not help build strong communities.

Rather than "streamlining" the process this area needs far more research. For example, in this parish there is a need for homes to allow older people to downsize but without giving up some of the amenities they value. Other countries have demonstrated that older people can live alongside families and single people to mutual benefit.

We do not believe evidence gathering in this area would be "disproportionate to the overall objective". As the Secretary of State says in his introduction, this consultation is not just about the numbers.

b) do you agree that the current definition of older people within the National Planning Policy Framework is still fit-for-purpose?

Yes



**Question 11:**

a) should a local plan set out the housing need for designated neighbourhood planning areas and parished areas within the area?

No. This is too prescriptive. Parish Councils should be free to work with local authorities to determine housing needs within a Neighbourhood Plan area.

b) do you agree with the proposal for a formula-based approach to apportion housing need to neighbourhood plan bodies in circumstances where the local plan cannot be relied on as a basis for calculating housing need?

No see response to Q11a

**Question 12:** do you agree that local plans should identify the infrastructure and affordable housing needed, how these will be funded and the contributions developers will be expected to make?

Yes - greater transparency would be welcome

**Question 13:** in reviewing guidance on testing plans and policies for viability, what amendments could be made to improve current practice?

n/a

**Question 14:** do you agree that where policy requirements have been tested for their viability, the issue should not usually need to be tested again at the planning application stage?

Yes

**Question 15:** how can Government ensure that infrastructure providers, including housing associations, are engaged throughout the process, including in circumstances where a viability assessment may be required?

n/a

**Question 16:** what factors should we take into account in updating guidance to encourage viability assessments to be simpler, quicker and more transparent, for example through a standardised report or summary format?

n/a

**Question 17:**

a) do you agree that local planning authorities should set out in plans how they will monitor and report on planning agreements to help ensure that communities can easily understand what infrastructure and affordable housing has been secured and delivered through developer contributions?

Yes

b) what factors should we take into account in preparing guidance on a standard approach to monitoring and reporting planning obligations?

n/a

c) how can local planning authorities and applicants work together to better publicise infrastructure and affordable housing secured through new development once development has commenced, or at other stages of the process?

An online register

**Question 18:**

a) do you agree that a further 20 per cent fee increase should be applied to those local planning authorities who are delivering the homes their communities need? What should be the criteria to measure this?

No - there seems no logical reason for this

b) do you think there are more appropriate circumstances when a local planning authority should be able to charge the further 20 per cent? If so, do you have views on how these circumstances could work in practice?

Not sure - possibly on developments of a size or complexity that require more scrutiny or where applicant makes repeated changes.

c) should any additional fee increase be applied nationally once all local planning authorities meet the required criteria, or only to individual authorities who meet them?

Not sure we understand the question - surely once all LPAs meet criteria that is de facto national compliance?

d) are there any other issues we should consider in developing a framework for this additional fee increase?

If the aim of higher fees is to support planning departments then a different set of criteria is needed to address poor performance, rather than "penalising" authorities for not meeting unachievable housing targets.

The report referred to in response to Q19 includes the recommendation that councils should be free to set fair levels of planning application fees to recover full costs.

**Question 19:** having regard to the measures we have already identified in the housing White Paper, are there any other actions that could increase build out rates?

Yes - please refer to the recommendations in "Unlock the housing blockers - Tackling unimplemented planning permissions and housing delivery barriers in the South East." <http://www.secouncils.gov.uk/wp-content/uploads/2017/01/FINAL-SEEC-report-Jan2017-Unlock-the-housing-blockers.pdf>