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Rt Hon Damian Green MP
House of Commons
London
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Dear Damian,

We read Tenterden Town Council's submission on the Planning White Paper reform and accompanying letter with interest. They were a very clear call to maintain the status quo within the planning system.

South Willesborough and Newtown Community Council was formed in May 2019 and does not have Tenterden's long history, experience of planning or networks. However, the Council experienced one of Ashford's largest, multi-faceted planning applications on the former Newtown Railway Works site in its formative months in 2019/20.

We respect Tenterden's view of course, but as new kids on the block we felt the need to express "the other" view - our view - based on our experience to date of the planning system.

First, we agree with Tenterden that the government appears to be placing the blame of slow delivery of approved housing on local authorities. We agree that levers should be used to force developers to build more quickly but don't they already exist? It is our understanding that Town & Country Planning (Development Management Procedure) Order 2015 allows local planning authorities to order that land is "finally disposed of" if the applicant does not make progress within agreed timescales.

Equally, though, we know that Planning authorities have been hamstrung by budget cuts over the last ten years which can only have impacted on their ability to manage and police the current delivery model. SWAN Council feels that the combination of an underfunded planning service and an inappropriate, rigidly complex or simply outdated delivery model are the true causes of slow delivery.

Secondly, we question Tenterden's assertion that the current planning system provides truly effective outcomes and ensures, as Councillor Crawford put it "weget the best possible outcome for the right type of developments, built in the right place, in the right numbers" Cllr Crawford considered that a relaxation of planning regulation would allow "an explosion of uncontrolled building on our valuable countryside".

We would agree with that to some degree and would want greater assurances from the Government on how the combination of simplified land zoning, permitted development concepts and modification to use classes order would prevent that occurring. That said we would ask, especially the rural parishes, to consider whether the current planning system has prevented an

explosion of controlled building on their valuable countryside; both directly and indirectly by diminishing the rural sense of place, blocking sight lines to cherished vistas or building on conservation areas, for example.

In our view the current model has led to development in the wrong place - notably our rural and edge of town villages when

- main employment opportunities exist in urban areas and on key transport route corridors.
- key high speed commuter transport infrastructure exists in the urban areas.
- the decline of traditional town centres suggests they should be re-purposed as a priority to bring people back in to them.

In our view the current model has allowed a disproportionately high number of the wrong type of homes to be built in the wrong place and deserves review.

Thirdly, this council accepts that irresponsible developers can and do manipulate the system. But if they do, it is because they can. We don't condone land-banking for example but the real cause of the problem, we see, is the leaky planning model that allows them to manipulate loopholes in it in the first place. In our view the best way to prevent developers manipulating the system is to review it and design out the opportunities.

Our limited experience may be beneficial. We have considered this issue without historical baggage and have found the planning system wanting in many other areas.

In our view the system generally needs to be less complex, less rigid and less opaque and loopholes that give developers an opportunity to manipulate the system closed. It needs to work proactively rather than reactively for communities. In short, it should provide for and respect the needs of local communities whilst safeguarding the natural and built environment. We believe there is an argument that the current system falls short in both.

Our starting point was not to seek to defend the status quo but to challenge it.

We found

- A. a voluminous local plan, virtually unintelligible to anyone other than a planning professional reading it for the first time
- B. a target-driven local plan where targets are arguably fallacious and which cannot possibly factor in 15 years of future social and technological change. We saw the plight of town centres, including Tenterden town centre) as a good example of local planning failure
- C. a questionable scale, tenure mix and quality of new housing - especially in rural areas
- D. high property prices and rents disadvantaging both current and future generations,
- E. a palpable lack of quality infrastructure and what appears to be an increasing dependence on developer contributions to provide much needed affordable accommodation
- F. communities that rarely get a proactive say
- G. an unclear relationship between Local Planning Authority officers, the Council (their employers) developers and the community

We questioned whether the current Local Planning Authority system is still fit for purpose. Our experience of the Newtown Railway Works planning application was a disregard for the cumulative impact of big ticket developments on our local community with the Borough Council only able to take individual applications on their own merit. On further investigation we found the parochial nature of planning replicated across local authority boundaries.

We have serious concerns about the lack of a cumulative approach to developments in Folkestone and Hythe and Maidstone for example and the impact of them on e.g.local economies, transportation and travel to work scenarios. With large developments planned for the Ashford area, Lenham Heath on Ashford's border and Leeds amongst others in Maidstone, Otterpool, the Martello Lakes, Shorncliffe Garrison to the East and the Romney Marsh to the South, it could be argued that the current system, based on local authority geographical boundaries is an

anachronism - a product of the twentieth century that is simply too parochial to be truly effective in meeting the pace of change in the twenty-first.

I think we are all aware that Local Planning Authorities can cover several local authority areas (The National Parks for example) and it is our view that we should not simply accept what history has given us and that the review should include an examination of where a joint approach would be advantageous and work in the community's best interests. From an impartial perspective, the creation of a "M20 Coastal Corridor" LPA comprising the local authority areas of Maidstone, Ashford and Folkestone and Hythe would seem sensible given today's environmental and societal challenges and the transport infrastructure that connects them now which was non-existent when local government reformed almost 50 years ago.

We disagree with Tenterden's view that the proposals are "reckless, unsound and unwarranted" We agree that more explanation is needed from the Government but are more concerned that we may have, over that 50 years, simply come to accept

1. Local Planning Authority units which do not necessarily reflect the social and economic behaviours of a wider area
2. A local plan based on potentially fallacious targets and calculations of need
3. A resultant system of land management essentially based on the laws of supply and demand which in our view has contributed significantly to increased land values (especially in the South East)
4. Developments that communities don't necessarily want or need.
5. A dearth of affordable accommodation and Section 106 agreements used increasingly to provide affordable accommodation when in our view it is probably the least acceptable means of addressing the specific mitigation of impact of new development on the community.
6. An unclear picture of the role of Local Planning Officers vis-a-vis the Council, developers and the community

That final point has caused some debate. We asked ourselves who we think Local Planning Officers owe greatest allegiance to. Are they "honest broker" between all the stakeholders or are they predominantly agents for their employers? Are they ambassadors for developing Council/ Developer "partnerships" in order to achieve housing and employment targets or ambassadors for developing strong relationships between Council and its electorate?

Our jury is still out and it would be interesting to have other local Councils' thoughts. We can say that as far as the Newtown Railway Works decision was concerned, it felt that principal Council and developer objectives were given priority over local Council and community concerns. For such a large development that will cause significant disruption for several years, the community gained comparatively little. If our experience is common then it would be another reason to support a review that aims to give local communities a greater, more proactive say in what is acceptable in their own areas.

Yours sincerely

Matthew Harris

Chair- Planning and Highways Committee
South Willesborough and Newtown Community Council