

## Response by High Kelling Parish Council, North Norfolk, to the White Paper: Planning for the Future

High Kelling Parish Council shares the White Paper's concerns about the lack of high quality affordable housing but believes that it offers an inadequate analysis of the underlying problem and wholly inadequate solution. In summary, if implemented, this would be a charter which promotes development for profit at the expense of community need.

More specifically:

1. There may be aspects of the current planning system in need of reform, including the long drawn out appeals process, but the principal cause of the housing crisis is chronic government underfunding in recent decades including the non- replacement of the social housing stock following Right to Buy, and failure to resource and enable housing associations and local councils to build homes to meet local needs.
2. Under the guise of simplifying the planning system the voice of the community is silenced. Once designated a Growth Area there is a presumption in favour of development which takes little or no account of the detailed local knowledge of housing needs on the ground. As a Parish Council we hear and represent the residents of our small village. We do not see ourselves as part of the planning bureaucracy, nor as NIMBYs - there are no objections to the great majority of planning applications. This lowest level of local democracy has the great merit of encouraging people to participate in the development of their community.
3. We are concerned that Renewal Areas lack meaningful protection and the distinction between Growth and Renewal Areas will be eroded. This is tacitly signalled in the White Paper

Renewal areas "suitable for development" – this would cover existing built areas where smaller scale development is appropriate. It could include the gentle densification and infill of residential areas, development in town centres, and development in rural areas that is not annotated as Growth or Protected areas, such as small sites within or on the edge of villages. There would be a statutory presumption in favour of development being granted for the uses specified as being suitable in each area.

4. We are not convinced that the White Paper will deliver on its stated aspirations. We see in our own part of Norfolk how developers' 'game' the planning system to avoid or minimise the requirement to provide the much needed affordable homes for local people. There is additional building, but it doesn't address local needs and is completely divorced from infrastructure provision despite putting extra strain on medical and dental facilities, schools, roads and parking .It's difficult to imagine that relaxing the requirement will improve matters and the Local Government Association (LGA) notes that the proposal to scrap the requirement to build affordable housing on sites of up to 40-50 homes would have resulted in 30,000 fewer affordable homes over the last 5 years.
5. We have concerns about proposed extensions to Permitted Development Rights (PDR). Reducing the requirement for planning permission may not necessarily increase the number of houses actually built. The LGA in February this year pointed out that planning permission had been given for around one million new homes which remained unbuilt. Schemes can be delayed through developers' land banking, waiting to maximise their profit, rather than the planning process itself. Another example is the PDR allowing conversion of commercial units producing small cramped flats in unsuitable locations. The LGA estimated only this year this had led in the previous four years to the loss of 13,500 affordable homes with developers dodging the process. RIBA, RICS and the Town and Country Planning Association expressed

concern that such conversions can produce the slums of tomorrow. We do not feel the White Paper addresses these concerns.

6. With regard to the AONB we are concerned that relaxing the planning requirements will allow development driven by profit rather than the quality of the rural environment in our village, especially its character and identity. Villages in the AONB have their own unique environments which deserve to be sensitively protected and nurtured. Parish Councils have a key role in this regard, the White Paper does not recognise this or offer sufficient protection to guarantee the special status of AONBs.