

Response ID ANON-JGZW-J42B-M

Submitted to Planning Reform Working Paper: Reforming Site Thresholds
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Respondent Details

About You

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Abingdon-on-Thames Town Council

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Town/Parish Council

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Please state whether you are responding as an individual or on behalf of the organisation stated above

Organisation

Please indicate in what capacity you are responding to this consultation (please only select one)

Parish or town council

If other, please specify:

Reforming Site Thresholds

1 Would a medium-sized site threshold help reduce barriers and accelerate delivery for SMEs, if linked to the proposed changes to regulatory requirements set out in the working paper?

Yes

Please provide further information:

We are agree with the working principle.

2 Should the threshold be 10–49 units, or could other size ranges provide a better balance of simplicity and impact?

Text box for comments:

6 - 49 units.

Local agents advise that sites of 6 and above are not going to very small builders any longer for economic reasons so the SME should be encouraged to look at this market.

Traditional smaller plot builders are avoiding risk and preferring to undertake larger extension and remodelling works as a result.

3 Should the medium threshold apply to commercial and other non-residential development and how should mixed uses be reflected?

Text box for comments:

We don't have sufficient knowledge to comment.

4 If the medium-sized site threshold were introduced, should the exemption from paying the proposed Building Safety Levy for fewer than 10 dwellings be extended to align with medium-sized development sites?

No

Text box for comments:

This must be enforced due to several recent known incidents that have reached the national press.
Matters such as fire safety should always be paramount.

5 Should there be solely area-based size thresholds (ha) given the different contexts and densities, particularly for very small, small and medium-sized sites? Or would it be more appropriate to also specify a unit size threshold?

Text box for comments:

A unit size threshold should be applied to cater for flatted developments or HMO's.
There should also be a maximum number of storeys allowed in the development.

6 Are the proposed streamlining options the right ones for government to consider?

Text box for comments:

On balance yes apart from comments previously made.

7 Are there further changes that could and should be linked to new or existing thresholds? Are there wider changes that could be made through national planning policy that would be beneficial?

Text box for comments:

As s.106 streamlining has been mentioned it may be helpful to examine whether a more 'templated' version could be considered for the smaller two categories of site.

8 Is the planning application process for small sites more challenging on brownfield land than greenfield land? If so, then what are these challenges or barriers?

Text box for comments:

Yes, and rightly so as brownfield sites with previous usage have the potential for more environmental considerations based on those previous uses. Transport restrictions i.e. no parking, no vehicle development may be the only option on brownfield sites.

9 Are the determination periods detailed in this working paper the correct ones? Would shorter determination periods be appropriate for a particular site size once wider reforms to planning fees have been implemented - including those set out in the Planning and Infrastructure Bill (<https://www.gov.uk/government/publications/the-planning-and-infrastructure-bill/factsheet-local-fee-setting>)?

Don't know

Text box for comments:

Certain sites may require more examination than others so it is difficult to apply a one size fits all approach.

10 What are the specific barriers SMEs face during s.106 agreements and what would be the most effective action for government to take, in line with its manifesto commitments on affordable housing?

Text box for comments:

Financing affordable housing options and CIL where appropriate may be more difficult dependant on the scale of the SME. Revisions to payment scheduling or the percentage of open market value paid on affordable housing tenures to the SME by Registered Providers could be reviewed as part of this process.

11 What are the barriers to developing very small sites as defined above and what parameters could be helpfully addressed in a design code?

Text box for comments:

Could a simplified design code be provided; one for brownfield and one for greenfield to cover items such as:

1. Affordable housing or monetary contribution.
2. Environmental concerns, both existing and future.
3. Housing sizes and plans.

12 What types of rules set out in design codes would be most beneficial in unlocking development?

Text box for comments:

As above simplified templated design codes setting out items as above would give certainty and ability to plan how best to proceed.

13 Are there other issues or opportunities to consider for ensuring the success of these proposals?

Text box for comments:

Monitoring over an initial period and flexibility to adapt and revise over that monitoring period.

14 Do you anticipate any environmental impacts from these proposals that the government must consider under the Environmental Principles Policy Statement?

Text box for comments:

Not if Environmental assessments have been correctly completed and are adhered to.
Environmental and Biodiversity as present should be maintained.

15 Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

Text box for comments:

As a Town Council this could generate additional planning enquiries on previously undeveloped smaller sites which may cause comment amongst some residents.

We do not believe that protected characteristics that are already catered for when planning new developments should be adversely affected or impacted.