



Dartmouth and Kingswear Society

Conserving, Enhancing, Informing, Enjoying

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Planning for the Future Consultation Ministry of Housing, Communities and Local Government

The interest of the Dartmouth and Kingswear Society is a Charity which exists to preserve and enhance the area covered by not just Dartmouth and Kingswear but also the surrounding villages, the River Dart and the neighbouring coastline and countryside. This area is entirely within the South Hams area and much of it is part of the South Devon AONB.

Part of our role is to cooperate with the local authorities, planning committees and all other statutory authorities and other organisations having similar objectives to the Society.

It is in this regard that one of our pressing issues currently is planning generally but also, particularly, assistance in the preparation of the Dartmouth Neighbourhood Plan which relates only to the parish of Dartmouth itself. It is in support of these issues that we now submit this response to the Government's white Paper "Planning for the Future".

Part 1 Context

The South Hams is a highly protected landscape. Large parts of Dartmouth are in the SD AONB and there is much of Dartmouth which is in its Conservation Area. Dartmouth has the River Dart to the east and has limited space available for further housing. It suffers

from poor transport links and has an infrequent bus service. There is very little affordable housing and there is a waiting list for housing for those in need. Housing prices are high because of the desirability of Dartmouth and its immediate area. Local wages are very low such that the house price to wages levels making it impossible for many to have a home of their own in Dartmouth and resulting in a lack of ability to purchase an affordable house based on the current definition.

Sustainable development is a significant problem as there is a lack of employment other than in the lowly paid tourism and hospitality markets. The need to provide further employment without an adequate local business sector again makes for practical difficulties resulting in local young people leaving to find jobs and housing elsewhere.

The surrounding area is very beautiful but is essentially rural in nature and unsuitable for development.

The combination of the rural nature, the position in SD AONB and the age profile and lack of employment choice for our residents means that we are definitely a Protected area as defined by the Consultation Document.

The introductory comments to the Consultation Document from the Prime Minister and the Minister make for wise words about Planning needing significant reforms to our “outdated and ineffective planning system” and about “planning decisions being discretionary rather than rules based”. We recognise both these statements as a generality for England or parts of England but these remarks bear no relationship to the underlying position facing us locally in Dartmouth and the South Hams.

One size certainly does not fit all and the Consultation gives us the opportunity to make the Ministry aware that the proposals in the

Planning for the Future document are wholly inadequate by not recognising that rural areas such as ours do not fit the general descriptions appearing throughout the consultation document.

The view that planning decisions are discretionary rather than rules based, with the result that nearly all decisions to grant consent are undertaken on a case by case basis, may well give central government and the public sector nightmares because of the time and effort expended on each decision. However, the truth is that in a local environment such as Dartmouth and the surrounding area effective arrangements are certainly required but rules here cannot be general and individual cases require case by case review. If action by central bodies is required it would be better to increase the number and quality of planning staff to enable this case load to be better managed and delivered.

It is as though the drafting of the Consultation proposals had been done by people who had never visited or lived in rural communities and therefore have not appreciated that “one size does not fit all”.

As will be clear from these opening remarks land categorisation as proposed will not work and would lead to failure in your own objectives for sensible reform.

One further observation is necessary. The recent Glover proposals for amalgamating National Parks and AONB's is critical for the countryside and for us in the South Hams. The full list of 27 proposals proposed by Glover included setting the AONBs up as Statutory Consultee bodies with greater independence and authority to advise on planning matters and the preservation and enhancement of the heritage, conservation and AONB areas. All these matters need to be reviewed and included properly in your deliberations for planning.

The Designated Landscapes Review which produced the Glover proposals is a critical matter to be fully considered in your

Consultation process going forward to support protected landscapes and related areas.

The Minister's desire for a more predictable system will fall flat if it fails to consider adequately the rural scene.

The five key proposals:

First - The current approach will not provide more democracy as it fails to understand the rural scene. See the comments above with particular reference to the AONB and the rural scene.

Second – a streamlined digital approach may be fine across most of England but it does not recognise at all that there will still be a need to have local face to face input and understanding of local issues when taking planning decisions. There must be a continuum of existing non digital processes as well.

Third – The idea of bringing a new focus on design and sustainability is admirable but too much uniformity will not achieve the results in many situations. Preservation of green spaces and designated green space has to be considered better so as to achieve sustainability for the future.

Fourth – Improvement of infrastructure is a worthwhile aim but lack of understanding by planners of the local areas and limitations of understanding will pass power to developers, loss of consultation and input by localities and result in poor decision making. Further consultation is required as to how S.106 monies are to be spent locally which means that local input is essential at the outset and uniform approaches to planning will bring poor planning and infrastructure.

Fifth – again an admirable idea but there is little consideration of the wider local needs when there is little or no available space in the first place. Each location needs to be considered on its merits. An attempt

to insist there should be more local housing by some formula or other is utter nonsense when there is either inadequate or no space available. This makes a mockery of the idea of allocating housing to such a locality.

Conclusion on the proposals

The Dartmouth and Kingswear Society strongly objects to these sweeping and ill-considered proposals.

Part Two – Responses to the Consolidation Questions

1. Unreliable, Under resourced and Bureaucratic.
2. Yes re involvement with planning
3. By all forms of communication including newsprint, social media, emails, advertising
4. A) Preservation and enhancement of our Conservation and AONB areas and our heritage buildings, B) designating and maintaining our green spaces, C) Affordable and Social housing
5. No. The categorisation approach will not apply as it is too dogmatic and will result in disaster. It will fail to deal with the employment issues and the housing crisis. The lack of sufficiently experienced and mature planning staff is a real problem as well as their lack of resources and will lead to reduced accountability.
6. No. It fails to recognise the need for local input and policies. See also the introductory comments above re the specific factors in this area which a national framework would fail to deal with adequately

7. Environmental matters are a paramount concern in a marine, coastal and rural location. General policies and practice for England as a whole will not be adequate. Any reforms would be inappropriate if they failed to assess the local impact and needs.
8. No. A standard method would fail to recognise and deal with our specific and critical local needs.
9. No. There is a need to obtain local input and participation. Danger that local Planners would not seek to recognise specific local issues relevant to/for our rural and AONB areas. The views of local residents must be sounded
10. Not sure as improved efficiency is needed but over reliance on digital inputs for decision making without adequate understanding is unacceptable
11. No, as some normal local dialogue and input is needed alongside web arrangements. Local input when preparing the plans is essential and a wider group of people and organisations is needed
12. No. This fails to understand the time needed locally and would detract from local involvement in a meaningful way as engagement would decrease, designation would suffer and relevant factors would be missed in the short timeframe
13. Yes, they should be retained. The Neighbourhood Plans are critical and enormously beneficial when well organised and managed. Local contribution is massively beneficial in producing draft proposals and good policy proposals based on local understanding and input. They must be protected and better resourced to assist the local volunteers involved

14. Not sure developers need to be able to produce their own plans but they must be approved by local communities so as to control what the developers plan to do. Reasonable timescales may be needed which allow sufficient scrutiny and allow the developers a reasonably practical time before commencement of works
15. There is a great desire by wealthy owners and developers for over development of sites. The planners seem to ignore (as noted by Planning inspectors) the need to preserve and enhance property in the Conservation and AONB areas. Lots of the designs are modern but take insufficient account of the local scene and environment. Planners and District Councillors need to take account of their wider responsibilities in this regard. Too much glazing is being permitted.
16. Need for protection of green spaces and more designation required. Climate change issues are not receiving adequate consideration and long term planning is needed. Abuse of previous planning requirements have occurred and authorities have been inadequate in enforcement and correction
17. Not sure. Local input has to apply for such standard designs to be adjusted for local circumstances
18. No Why is yet another costly bureaucracy needed? A central organisation to set minimum requirements might be valuable but not one which predicts an overall requirement regardless of heritage, history or local styles and circumstances
19. Not sure. See 15 above where we have experienced poor designs and lack of local consideration to style and character.

20. No. What would this achieve? Beauty in whose eyes, an urban dweller or a rural resident?
21. Good design, character in keeping, not over development and not too much glazing. Must not be out of keeping with the heritage environment locally
22. See above re S.106 and involvement needs locally when discussing the use of the funds. Funds and rates should be set locally and provide more value
23. Not sure, but we believe that these are two separate matters needing independent resolution
24. No support giving financial risk should be allowed
25. Not sure, but they should not take on any increased financial risk

Our general overview is that these proposals fail to take account of a rural environment and the Glover proposals for Landscape review must be incorporated as well.