



Response to the planning white paper

October 2020

Planning for Development

1. What three words do you associate most with the planning system in England?

Essential, sustainable, attacked.

2. Do you get involved with planning decisions in your local area?

Yes

2(a). If no, why not?

N/A

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

Your proposals would make it harder for some to access and would, in any case, deny most of peoples' right to get involved. See our recent report on involvement and the white paper:

[http://www.smartgrowthuk.org/resources/downloads/Pulic Involvement in Planning Report.pdf](http://www.smartgrowthuk.org/resources/downloads/Pulic%20Involvement%20in%20Planning%20Report.pdf)

4. What are your top three priorities for planning in your local area?

The environment, biodiversity and climate change, including climate change justice for all members of society

Sustainable management of our built and natural environment

Sustainable management of our economy and transport system

See <https://www.rtpi.org.uk/media/3682/five-reasons-for-climate-justice-in-spatial-planning.pdf>

5. Do you agree that Local Plans should be simplified in line with our proposals?

No. The local plans system may need simplifying, but your proposals would weaken it.

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

No. Your proposals would essentially wreck the system.

7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

No. Legal and policy tests are important. You do not, in any case, define “sustainable development” in any operational or meaningful way.

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

Via regional strategies.

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

Yes. There needs to be methodology for housing requirements, particularly including need for socially rented housing, but your plans are simply designed to generate raw numbers of market homes wherever possible. Your treatment of constraints on development is either inadequate or totally lacking. See our report:

[http://www.smartgrowthuk.org/resources/downloads/Constraints to Development Report.pdf](http://www.smartgrowthuk.org/resources/downloads/Constraints%20to%20Development%20Report.pdf)

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

Not sure, but not in the simplistic way you propose. There is no evidence that building more houses locally actually increases affordability. See Figure 2 in:

[http://www.smartgrowthuk.org/resources/downloads/Smart Growth UK Response to Changes to the Current Planning System Consultation.pdf](http://www.smartgrowthuk.org/resources/downloads/Smart%20Growth%20UK%20Response%20to%20Changes%20to%20the%20Current%20Planning%20System%20Consultation.pdf)

9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?

No. The growth area plans would erode and destroy the vital role that planning plays and exclude local communities’ democratic right to participate.

9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?

No. In renewal areas your proposals would continue the destruction of the planning system that growth areas would take a lead on. Your protected areas would allow the same level of development as under the present system and could be significantly eroded every five years to generate new growth areas.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

No. New settlements are by far the least sustainable form of major development. They have the highest infrastructure requirement, generate the most unsustainable transport and destroy huge areas of greenfield land. Using the NSIP is just a way of excluding people from the democratic process.

10. Do you agree with our proposals to make decision-making faster and more certain?
No. If decision making is faster and more certain, it would certainly be poorer in all respects – for the environment, for society and for the economy.

11. Do you agree with our proposals for accessible, web-based Local Plans?
Not sure. Only acceptable if traditional routes to provide information are still available. A large proportion (c. 20%) of households with one adult over 65 years of age have no access to the internet. See:
<https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homeinternetandsocialmediausage/bulletins/internetaccesshouseholdsandindividuals/2020>

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?
No. Even if they were simplified, the process should take as long as is needed.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?
Yes. They should be retained, and not reduced to irrelevancy in the way the proposals suggest.

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?
Neighbourhood plans need more legitimacy by being able, in some circumstances, to challenge local plans.

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?
Yes. Unbuilt permissions should be subtracted from house building targets being imposed on local authorities.

Planning for beautiful and sustainable places

15. What do you think about the design of new development that has happened recently in your area?
It's poor, demonstrating that the fine words in the NPPF, as so much else, are undermined by an obsession with market house building.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

Sustainability is not at the heart of the proposals; they would undermine sustainability. The priorities for sustainability involve many environmental and social factors. They would involve a serious response to the climate and biodiversity emergencies. They would limit soil sealing. They would respect the water environment's ability to supply areas with water and its water bodies' ability to handle waste water, and many other things, including protection for vulnerable members of society.

17. Do you agree with our proposals for improving the production and use of design guides and codes?

Not sure. They could give too much power to the development industry and too little to local communities. Any use of such techniques would necessitate professional inputs from planners and from communities.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

Not sure. There can be little faith in environmental quangos which have become underfunded and subservient to ministerial diktat. Local planning authorities already have a chief officer for design and place-making - called the chief planning officer.

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

No. Homes England's strategic priorities need a total overhaul. It's astonishing to see tacit acceptance that its strategic objectives presently lack sufficient design emphasis.

20. Do you agree with our proposals for implementing a fast-track for beauty?

No. It's simply a way of over-riding proper consideration. There is no objective standard for "beauty" (though ugliness may be easier to define), nor is there a national standard of beauty that could be applied across the whole country.

Planning for infrastructure and connected places

21. When new development happens in your area, what is your priority for what comes with it?

More affordable housing/more or better infrastructure (such as transport, schools, health provision)/design of new buildings /more shops and/or employment space/green space/more socially rented housing/sustainable, rail-based transit/reclamation of brownfield land/sustainable urban drainage/protection of biodiversity/strict controls on noise, light and air pollution, soil sealing and disturbance/grey water harvesting/zero-carbon buildings/proper consideration of environmental sustainability/ etc., etc..

22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

Not sure. It could prove to be inadequate and could be used for irrelevant purposes.

22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?

No comment.

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?

More. Local authorities should be prevented from using any type of infrastructure levy for supporting front line services. It deprives residents of the benefits that were intended for the area subject to the development, and it makes it easy for the Government to underfund local authorities.

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

No.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

No. Permitted development rights need to be drastically curbed.

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

No. We need to secure much more affordable housing and to make a much higher proportion be socially rented.

24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?

Not sure. It needs to be either fixed at the outset as a cash contribution from developers and not undermined by "viability" claims or, if provided as an in-kind payment in terms of homes built, they would be provided to the local authority and not offered as "slightly-less-unaffordable" market housing as happens now.

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

No. Such an approach would be reckless. And by the way, that should be "mitigate", not "mitigate".

24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?

Yes. There would need to be legislation to ensure its quality.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

Yes, but only if they are adequately funded so they don't get forced to spend it on other vital services.

25(a). If yes, should an affordable housing 'ring-fence' be developed?

Not sure. It would depend on how it was developed.

Delivering change

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

No.