

Planning for the Future Consultation Response

Q1: What three words do you associate most with the planning system in England?

A1:

- a) **Complex:** Complicated rules and terminology, making it difficult for the layperson to get to grips with.
- b) **Remote:** The process is largely carried out behind closed doors, with ineffective consultation.
- c) **Biased:** As a result, the process ends up being biased in favour of large developers with deep pockets and easy access to planning and legal expertise.

Q2(a): Do you get involved with planning decisions in your local area?

A2(a): Yes

Q2(b): If no, why not?

A2(b): N/A

Q3: 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?

[Social media / Online news / Newspaper / By post / Other – please specify]

A3: Social Media, Online News, Newspaper and direct email.

Q4: What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

A4: Protection of green spaces / Better local infrastructure / Regeneration of urban areas.

Please note that "the environment, bio-diversity and action on climate change" should not be grouped together in one category. I care a great deal about bio-diversity and the environment, but I think that "action on climate change" such as windmills damage the environment and bio-diversity by killing bats and raptors.

Q5: Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

A5: No.

The proposal to identify just three types of land, is a deceptive over-simplification. It will merely mean that the fight over what goes where will be transferred to this decision, rather than to specific site allocations.

The proposal to grant planning permission in principle virtually automatically on the basis of this land classification will ride roughshod over genuine local concerns about development in certain areas. The single "sustainable development" test will replace the current need for plans to be "sound". Again, this sounds like a recipe for overriding local concerns and removes the need to demonstrate that plans are justified and effective.

The idea of the Local Plan being reduced to an online map sounds superficial. Such a system would make it very difficult to print out a Local Plan, sit down and read it properly end-to-end to get a proper feel for all that is being proposed for the District. Such a system could become a supplement to a proper Local Plan document, but it should not replace it.

Q6: Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement.]

A6: No.

This represents a massive centralisation of power that removes local control and damages local accountability. Such a proposal resembles a socialist 5-year plan and is simply anathema to a free, democratic society. The Tories are supposed to be committed to "devolving power to people and places across the UK". This proposal does the opposite. Model policies could be suggested from the centre, but councils should be free to adopt, modify or reject these guidelines.

Q7(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? [Yes / No / Not sure. Please provide supporting statement.]

A7(a): No.

Not only are you proposing to remove the more general test of soundness, you are proposing to water down the Sustainability Appraisal system and slim down the deliverability test. This looks like a recipe for approving plans are not sustainable or even deliverable and go against the wishes of local people. It's a recipe for disaster.

Removing the element of the Duty to Cooperate that forces councils to build unnecessary houses for neighbouring areas is a welcome part of these proposals. However, there should be some sort of duty to cooperate on strategic infrastructure.

Q7(b): How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

A7(b): See above. Maintain a Duty to Cooperate on strategic infrastructure such as major roads, schools, hospitals and railways.

Q8(a): Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]

Yes, but not the method you have proposed. The existing standard method that you introduced was good enough. It made sense, because the total annual housing requirement matched, more or less, the demographic projections from the ONS in the short term. Moreover, it has the advantage of removing a great deal of complexity and argument from the plan-making process. Its main weakness was the scale of the affordability uplift. However, you have now introduced an arbitrary 300,000 annual housing target that has no basis in the data.

Using the latest 2018-based household projections (Table 406) only 160K new dwellings per annum are required from 2020-2030 or 151K from 2020-2040. Using the median house prices and median earnings from the ONS (Table 1c), in 2019, the median house price to earnings ratio was 7.83. Even if the "affordability uplift" is accepted from the existing method, this inflates the annual house price requirement to 199K p.a. for 2020-2030 or 188K for 2020-2040. Even using the new proposed method, with the extra "affordability uplift" would result in 257K p.a. for 2020-2030 or 242K for the period 2020-2040.

Area code	Area name	2020	2030	2040
E92000001	England	23,542,797	25,147,231	26,572,792
	Additional households 2020-year		1,604,434	3,029,995
	Rate per year		160,443	151,500
	Existing Affordability uplift factor	7.83	0.24	0.24
	Total Required p.a.		198,850	187,765
	Proposed Affordability uplift factor	6.39	0.60	0.60
	Requirement under proposed method		256,609	242,305

Both the existing and proposed standard method plan to deliver far more than the demographic requirement. Yet you have set a target of 300K that is even higher and has no basis in fact. It's ridiculous.

A better approach would be to use the basic ONS projection as a guideline and add say a 5% buffer to account for the drop-off between permissions and delivery. In addition, you could give powers to councils to fine developers who do not meet the build-out rates set out in their planning applications. Such fines could be used to provide additional infrastructure.

Q8(b): Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]

A8(b): No. The Government seems to be operating under the mistaken assumption that building more houses will reduce their price. This is mistaken because for assets like housing, with very high stock to flow ratios, building more does not affect price very much at all. The primary drivers for high house prices are ultra-low interest rates and loose monetary policy – QE. This is exacerbated in desirable areas, so prices rise even more. The policy of forcing desirable locations to build even more will not impact price, it will more likely just increase demand to meet supply and in the process destroy the countryside around these areas.

There is alleged to be a suppressed household formation problem. Those who are renting could probably service a mortgage but cannot afford the deposit. Some help could be given here by reducing deposit requirements and strengthening the existing lifetime ISA provisions. Those still living with parents cannot afford to rent and therefore probably could not afford a mortgage either. The best way to help these people would be to build more social housing.

To be crystal clear, you should scrap the flawed "affordability" uplifts and replace them with a blanket say, 5% uplift to accommodate slippage between permissions granted and homes built.

I would support measures to increase the use of brownfield land in urban areas. In the post-Covid world, it is becoming clear there is less demand for retail, hotel and office premises. There will be an urgent need to regenerate town centres and high streets. Targeted assistance to redevelop these types of premises into desirable residential areas with interwoven leisure facilities would be an excellent policy.

Q9(a): Do you agree that there should be automatic permission for areas for substantial development (Growth areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement.]

A9(a): No. The planning system already feels remote and inaccessible to most members of the public. This proposal would even further reduce public participation. The proposal for central Government Development Consent Orders should be shelved. It is entirely inappropriate for central government to bypass local councils and local people to push through controversial developments against the wishes of local people and their representatives. Moreover, this proposal erodes the soundness and deliverability tests and also bypasses Neighbourhood Plans, further eroding local accountability.

Q9(b): Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]

A9(b): No. Automatic planning permission for pre-approved development types is just cookie-cutter planning and notwithstanding the proposals for beauty, will result in identikit developments across the country. It is fine to offer up guidelines for beauty from the centre, but local people and their representatives should be able to modify these ideas to fit in with the local area.

Q9(c): Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement.]

A9(c): No. For the same reasons identified above, planning should be locally led, not imposed from the centre.

Q10: Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]

A10: Broadly, yes. Modernising the planning infrastructure, establishing data standards and making the data and information more accessible is generally a good thing. However, it is likely that there will be significant glitches and issues with the first attempt at this. So, it is important that any new

system is flexible and adaptable to change and sufficient budget is allocated for at least two iterations beyond the first release.

Q11: Do you agree with our proposals for digitised, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

A11: Partially. The proposals to make Local Plans available digitally are generally to be welcomed. But removing the need for a single Local Plan document should be avoided. For such large, complex projects, such as a Local Plan, a single document should be available (perhaps as an option to assemble the pieces into a pdf from the digital system), so that it can be searched, printed out and digested as a whole.

Q12: Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

A12: No. It is a good idea to try and shorten the process. But these proposals are flawed.

For instance, it is simply not good enough to call for "best-in-class" consultation, but then give no detail on what this actually means or how it will be achieved.

Second, the proposals to put word limits on responses is inherently undemocratic. People should be allowed to have their say, put forward proper evidence and make their case as they see appropriate. This should not be stifled by artificial word count limits.

The alternative proposal of allowing Local Authorities to evaluate their Local Plan through a process of self-assessment is entirely unsuitable. It would effectively allow them to mark their own homework, with no intervention from a proper, independent third party.

Q13(a): Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]

A13(a): Yes. However, there should be a process for ensuring alignment between Local and Neighbourhood plans. What happens if the Local Plan identifies a neighbourhood for Growth, but the Neighbourhood Plan allows only limited development?

Q13(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?

A13(b): Making standard tools available to Parish Councils to facilitate the production of Neighbourhood Plans is a good idea. However, PC's should be free to decide the extent they wish to adopt such tools. Moreover, enabling PC's to utilise and amend standard design patterns and beauty standards should be encouraged.

Q14: 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 / No / Not sure. Please provide supporting statement.]

A14: Yes. Planning applications should include a formal build schedule. This would be approved as part of granting planning permission. Developers who delivered less than, say, 90% of the agreed homes in any given year should be charged a sum equivalent to the annual council tax for the undelivered homes. The proceeds of such charges should be ringfenced for local infrastructure projects.

Q15: What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/ or poorly-designed / There hasn't been any / Other – please specify]

A15: Sadly, in many cases, ugly and/or poorly designed. It is unfortunate that most new housing estates look very "samey" and are largely pretty ugly. Some look better, with a variety of housing types.

However, there are some strange regulations around road widths and parking that make many new estates unwelcoming. For instance, a new local estate of over 300 houses has been built near me, where there are parking restrictions on every street and only half a dozen or so public parking spaces for non-residents. This has the disadvantage of discouraging visitors to the estate to use the new sporting and exercise facilities. This effectively cuts off the new estate from the rest of the community. It's things like this that need to be addressed as well as visual appearance.

In addition, over a period of decades, there has been systematic under-investment in infrastructure. My local council (Hart) has an infrastructure funding deficit of c. £170m, compared to an annual budget of around £10m. This has caused a general presumption against development in the area, because nobody trusts that proper infrastructure will be delivered.

Q16: Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

A16: More green and open spaces; accessibility for visitors; energy efficiency; better visual appearance and integrated use of space; sense of community. However, energy efficiency should not be delivered by forcing tiny windows and inelegant design.

Q17: Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement.]

A17: Yes.

Q18: 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? [Yes / No / Not sure. Please provide supporting statement.]

A18: Partially. A new focus on beauty is to be welcomed. I am reluctant to support the establishment of yet another quango. It is not possible for a quango to ever produce an inspired piece of design – the old adage is that a camel is a horse designed by committee. So, it would be better if these design

codes could be delivered through existing bodies. The proposal that these bodies should perform "a wider monitoring and challenge role for the sector in building better places" sounds somewhat Orwellian. An alternative would be for there to be annual competitions to judge the best designed new developments in an area, region and nationally. In this way, beautiful design could be delivered and rewarded through aspiration, rather than attempting to enforce it by bureaucracy.

Small councils such as my own in Hart will struggle to fill the post of "Chief Design Officer". They will end up simply changing the title of the existing chief planning officer, with no uplift in skills. So, better to ensure that councils have access to skills and capability rather than enforcing meaningless job titles.

Q19: Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes / No / Not sure. Please provide supporting statement.]

A19: Yes.

Q20: Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

A20: Yes

Q21: 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 / Don't know / Other – please specify]

A21: More and better infrastructure, particularly transport, sports and community facilities; design beauty; sense of community; green space; affordable housing (although as mentioned above, Affordable Housing is hardly ever affordable, so there needs to be a focus on delivering social housing for suppressed households).

Q22(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? [Yes / No / Not sure. Please provide supporting statement.]

A22(a): Yes. However, all development of new housing should attract some sort of levy. If you set the levy too low, houses will be built, with little or no contribution to infrastructure, yet these new residents will add to the strain on existing infrastructure. Moreover, there should be additional levies where councils are shown to have infrastructure funding deficits.

Q22(b): Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]

A22(b): Locally. Local people and their representatives will be better at setting the appropriate rate for their area than Central Government.

Q22(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? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

A22(c): More value. My local council has a funding deficit of over £170m. This can only be addressed by delivering more money to catch up on past under investment.

Q22(d): Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement.]

A22(d): Yes. And I would go further and allow local authorities to borrow to fund delivery of social housing.

Q23: Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]

A23: Yes. It's only right that developments that add to the population of a local area pay their fair share of the additional infrastructure that will be required to support them.

Q24(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? [Yes / No / Not sure. Please provide supporting statement.]

A24(a): No. Infrastructure and Affordable Housing should be separated. I believe that the whole affordable housing concept is flawed, often delivering housing that is not even remotely affordable for local people. By all means attempt to deliver more affordable housing within the reduced overall housing target. However, such plans will not work to reduce prices, because of the stock to flow issues identified above, ultra-low interest rates and QE. Infrastructure spending is an entirely different issue, and you should aim to deliver much more money for infrastructure

Q24(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? [Yes / No / Not sure. Please provide supporting statement.]

A24(b): No. It is beyond ridiculous to effectively trade infrastructure payments for more housing. The two concepts should be kept separate. The drivers for infrastructure requirements are essentially housing and population growth. Affordable housing delivers additional population to an area, just like open market housing. If you deliver more affordable housing in lieu of infrastructure, you create an in-built funding deficit. The Infrastructure Levy should be charged equally for both affordable and open market housing. Otherwise, you end up with the situation of my local council, with a 40% affordable housing target and a £170m infrastructure funding deficit. The worst of all worlds.

Q24(c): If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]

A24(c): N/A. See earlier answer. Separate the two issues and this question becomes irrelevant.

Q24(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 / No / Not sure. Please provide supporting statement.]

A24(d): Yes. Affordable housing should still be of adequate quality, beauty and build standard. Otherwise, why bother to build them at all?

Q25: Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

A25: Yes, but not in the way proposed. Currently S106 payments have to be spent in the specific area where development occurs. This restriction should be lifted to allow councils to spend the Infrastructure Levy receipts on the highest priority projects in their entire jurisdiction. However, it should be recognised that the Infrastructure Levy is for capital works and should not be used to fund spending on day-to-day services or reduce council tax.

Q25(a): If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

A25(a): No. See earlier answer. Infrastructure funds should be used for infrastructure, not for additional housing that puts extra pressure on existing infrastructure.

Q26: 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?

A26: No.