

# Planning for the Future Planning White Paper

## Briefing Note

### The White Paper and how to respond

The Planning White Paper puts forward proposed reforms for the planning system. The document contains numerous questions, so responses should respond to these. An accompanying letter or statement could also be prepared.

The consultation lasts for 12 weeks, from 6<sup>th</sup> August 2020. Responses can be done on-line or in writing. Instructions, web links and addresses are on page 5 of the document.

### General Observations

- The paper shifts emphasis of local plans from policy making to formulation of rules and codes, based on centralised policies. The proposals represent a pronounced shift from community participation and local representative democracy to centralised decision-making.
- The paper makes no mention of Localism. Neighbourhood plans are mentioned in a few places, but there appears to be a narrowing of their scope onto design codes. There is no recognition of the ways in which neighbourhood plans are delivering growth housing and employment or the high street. Generally, there is no mention of the importance of participation in actual development schemes or creative place-making at site and neighbourhood levels.
- The paper centralises the policy/plan-making process to a significant extent. Centralised policies are proposed. The roles of local authorities and their elected representatives are limited, especially through curtailing their role in determining planning applications. Participatory elements of the system are curtailed, especially with regard to specific development proposals for specific sites. There will often be much little or no scope to influence development proposals at a planning application stage, as in the current system. For people moving into an area after a Local Plan is adopted, there will be little or no scope for participation at a planning application stage. The document claims to make the system more democratic, but the proposals appear to have the opposite effect.
- The proposed zoning system (Growth, Renewal, Protect) is simpler at first impression, but could be difficult to apply in practice. For example, Conservation Areas are classed as protect, yet these include economically active areas that are sometimes undergoing dramatic physical and economic transformations, including urban centres, high streets, industrial and commercial areas. It is hard to see how the approach would work in reality, given the complexity of cities, towns and rural areas. The emphasis appears to be on Local Plan undertaking zoning, rather than neighbourhood plans.
- The aim is to make the Local Plan process shorter, but as the local plan needs to consider sites in more detail and to pre-empt later outcomes, the opposite is the likely outcome. The Local Plan process could become protracted, with less flexibility. In considering sites, more cost will fall to local planning authorities, rather than developers.

- The text on public participation is focused on technology. Use of digital and social media should be considered as an essential part of engagement and consultation. However, engagement and consultation activities also need to be inclusive, including for people with limited or no access to IT. This is not really addressed.
- The historic environment receives little attention, with no questions directly relating to the subject. There is no mention of how the special statutory duties for historic buildings and areas will be applied through the zoning exercise. There is a protectionist view of heritage, rather than recognition of its economic value or how it supports economic development, regeneration and sometimes dramatic physical and economic transformations. Heritage appears to be an add-on, rather than an integral part of social, economic and environmental planning.
- Design is addressed primarily through design codes. There is no recognition that placemaking and achievement of good design need to be inclusive, participatory and creative activities. The reliance on codes reduces the scope for meaningful participation at site level and could lead to soulless, formulaic development.
- There appears to focus on style, with references to beauty, rather than design being considered in a more meaningful sense, for example pedestrian permeability and connectivity and urban spaces that support social and economic activities. The COVID-19 lockdown highlighted the human cost of poor quality housing and neighbourhoods. The lesson should be for local people to have more say in their neighbourhood, not less.
- It is proposed to create a central design body. This could be a positive step. However, concerns have been expressed over the focus of the 'Building Better, Building Beautiful Commission', especially over whether it promotes aesthetic agendas for certain individuals, rather than focusing on design as an inclusive and participatory activity. Participation in design codes is a poor substitute for proper opportunities for participation for actual sites and development schemes.
- The emphasis is still on high-growth areas, with little mention of areas where viability is the key challenge, rather than affordability. The main failing of the current planning system and also of national programmes for regeneration and economic development is that they focus development and public money in high growth areas, but do little to tackle viability challenges in under-performing areas. This creates congestion and land inflation in high growth areas and stagnation in other areas. Geographical economic inequalities are not really addressed.
- The paper recommends simplification of the current CIL and Section 106 provisions. However, the proposal is written with an assumption of high growth areas, with little recognition of areas where viability is an issue. Clearly, there is little scope for raising monies in areas where development is marginal or unviable.
- There is no real recognition of the nature of the housing industry and its business models. So the aim to build more housing is unlikely to be realised. The housing industry relies on a steady rate of delivery. Over-supply would result in a drop in price, making some schemes unviable. This economic reality is not addressed.
- Similarly, the focus is still on the London housing crisis, rather than addressing the needs of lower growth areas where the need is to create economic opportunity. There is no

recognition that house buildings will only occur in many areas if employment opportunities are created.

- In addition, a key problem of the current planning system is not addressed. The local plan system brings forward sites every few years, rather than providing a steady supply of sites. In areas with marginal land economies, a sudden increase in sites can undermine developer confidence. A better system would be to update local plans and neighbourhood plans in an incremental fashion, rather than through comprehensive review of the whole plan. This would help solve the problem of outdated plans and also provide land in a way that better reflects the business models of housebuilders.
- For the above reasons, the proposals would be unlikely to increase the rate of delivery of housing, and could reduce it. Increasing the rate of housing would require a more informed approach, for example by addressing the link between employment and housing supply and also supporting community-led housing, for example through partnerships with neighbourhood plan bodies and housing providers.
- There are likely to be implications for the public purse in terms of the additional level of work involved in assessing sites in the Local Plan process and also dealing with the legacy of poor quality housing and other development in the future.
- In terms of equalities assessment, the lack of participation in planning and design is especially significant, in particular for groups with specific needs. Participation in design codes is clearly inadequate. Also, by failing to address the need for more housing in an effective way, the paper would adversely affect people in both high growth and under-performing areas by failing to provide access to high quality housing and employment. This would especially affect people on lower incomes.
- This is a time of uncertainty, with the COVID-19 epidemic, the aftermath of lockdown and impacts of continuing restrictions, Brexit and the unknown outcomes of trade negotiations and increasing evidence of the impacts of climate change. The Planning White Paper injects additional uncertainties, so represents a high-level of risk at a critical time.