

Written evidence submitted by Tenterden Town Council [FPS 003]

Preface

The following is our opinion of the proposed new planning system. Views are given in good faith based on our experience and understanding.

We all know that planning and application decision making is a complex subject. Particularly with each LPA having different opportunities, issues, concerns and constraints. Today, the local plan contains specific development management policies for the LPA taking into account all the relevant attributes and constraints, and should continue to do so. It is essential for local authorities to be allowed the flexibility to set development management policies. This is the correct approach and one that the community can have faith in, if it is seen to be even-handed, whilst providing housing that is required.

The current planning system embraces democracy by allowing LPAs and parish councils, plus the local community to forensically examine and challenge planning applications submitted by developers. This ensures we as a community, get the best possible outcome for the right type of developments, built in the right place, in the right numbers. The positive contribution the community and parish councils can make has to be recognised. To ignore them is at MHCLG's peril. "Planning for the Future" must not move to a totalitarianism approach, but a participative approach to strengthen local decision-making, through building a strong alliance of local authorities and communities.

In our view it is not possible to apply centralised control and rules without undesirable consequences. It will disenfranchise, marginalise, suppress, and remove localism decision making from the LPAs, parishes and local communities. It will move significantly more power to MHCLG and developers with the aim to deregulate and let market forces have a much greater say where houses are built. The old proverb of "act in haste and repent at leisure" is so pertinent in this situation. Unfortunately, the country's whole community will be collectively repenting for generations if this white paper goes through unchanged.

MHCLG is criticising local authorities for not building enough homes, when in fact there are over one million homes with planning permission that are not being delivered by developers. This number equates to over three years of housing needs, so there should be no shortage of availability. MHCLG is placing the blame of slow delivery at the wrong door, when in fact they should be introducing regulations to impose on developers to build more quickly.

The white paper proposals are radical, but has missed the mark by not understanding and diagnosing the real problem. It has glossed over the steps HOW to achieve place making in practical terms. It fails to show any evidence that their assumptions are correct. In our opinion, they are unsound, reckless and unwarranted. It would not solve housing needs through dramatically reducing existing planning controls and scrutiny, but would allow an explosion of uncontrolled building on our valuable countryside.

The headline statement is that over the last 10 years, the build out rate is between 30% to 40% less than the permissions granted¹. It is not more permissions that are required, but levers to coerce developers to build. MHCLG have not understood the real problem and are recommending the wrong solution.

The proposed algorithm as it stands, is a weapon of "Mass Destruction" of unprecedented scale.

We all agree that all LPAs should have a local plan in place. However, the new process squeezes out the local community who have the local knowledge of their specific parish. This will result in zero confidence by the community in MHCLG, developers, the local plan and future applications. To

¹ <https://www.local.gov.uk/housing-backlog-more-million-homes-planning-permission-not-yet-built>

create more resilience through these proposals is not going to be achieved, unless it means building regardless of the colossal adverse consequences.

Finally, the probing inquiry questions to be answered are very open ended and therefore we have attempted to respond under a number of topics.

Is the current planning system working as it should do?

Raynsford Review of Planning in England

It is highly recommended that the committee reads the Raynsford Review of Planning in England² published in November 2018. Though the committee might not agree with all the conclusions, it is a very thorough analysis of identifying and understanding the problem, together with the associated symptoms experienced today and how the planning system can move forward.

Its approach is systematic, relevant, analytical and professional. It is very concerning that not one mention was made in the MHCLG white paper “planning for the future”.

2011 Localism Act

The Town and Country Planning Act 1947 formed the basis for much of today’s planning system for large scale planning and development of towns and cities. Quite rightly the 2011 Localism Act overhauled the 1947 system by signalling the formal abolition of regional plans and reintroduced the Local Plan format and the creation of Neighbourhood Plans as part of the development framework. Its aim to build homes in the right place of the right type, at the right time to support growing local economies, with the corresponding infrastructure; and protection for the environment.

This reform was well received and has formed the basis for identification of housing needs; site allocations; and the nurturing of democracy through public engagement of local plans, neighbourhood plans and application decision making. Though the NPPF is not perfect, it has formed a good basis for directing construction. Today the NPPF does not place sufficient emphasis on section 41 habitats for protection.

The Local Plan for our LPA has been successful and is trusted by the community at large. Throughout the LPA has ensured democracy during the consultation period and scrutinising individual applications.

Unfortunately, for the country as a whole, we are concerned that the system could be gamed by some developers to bend local plans and applications to their benefit and not necessary to the benefit of the community. However, there are considerably more pluses than minuses within the current system.

PiPs

With the introduction of PiPs, additional complexity and unintended consequences have been created. The planning system has become fragmented, bewildering and confusing. PiPs were introduced via secondary legalisation without due scrutiny by both houses of parliament and have introduced discordant or disparate elements into the planning regime and will drive through rogue consequences that will be regretted for decades to come. It has fragmented the shaping of local and national planning, with little co-ordination between the two, resulting with undesired outcomes.

We now have a situation where permitted development rights allow changes to a building’s use without the need to seek planning permission. This has resulted in tiny, poor, substandard homes without consideration of required infrastructure, parking and open space needs. In some instances, the result is development which has harmful implications for people’s health and wellbeing. The evidence

² https://www.cpreherefordshire.org.uk/assets/Documents/Reports-and-Leaflets/83aa59a158/TCPA_Raynsford_Full_Report_20181120_HIGH_RES.pdf

of inferior quality of homes produced through this route has now emerged through MHCLG's own report.

Town and Country Planning Association have highlighted that permitted development:

- a) Has made real place-making impossible in many places by effectively removing acres of land in key areas from councils' influence, preventing them from securing and co-ordinating development in sustainable, safe places. At the same time the government is critical of the planning system for the design quality of the places it produces.
- b) Has deprived councils of funding for the infrastructure – green space, community facilities, healthcare facilities, roads, and affordable housing – that is essential to new and existing communities' wellbeing because councils are unable to collect Section 106 payments on developments delivered through this route.
- c) Threatens local jobs and businesses because councils are unable to stop employment land in their areas being converted to housing. This potentially forces local people into unsustainable communities
- d) Has undermined local democracy and left communities unable to influence their local environment as it changes over time.

This is a recognised train wreck to the detriment of the community. How are the planning white paper and design guides going to rectify this and stop it in the future? Or will it be allowed to continue for perpetuity to the potential benefit of the landowner and developer?

Whether housing delivery is through PiPs or formal applications, there has to be a universal housing standard for ALL developments, that must be met. There has to be a level playing field for fees and housing standards, otherwise developers will have the ability to game to the weaker rules.

Public Trust

The MHCLG "Planning for the Future" white paper refers to the Grosvenor Britain & Ireland Trust in Housing Development report³. It quotes seven per cent of the community trust their local council, but fails to say only 2 per cent trust developers. In addition, it does not mention the key recommendations:

- a) Profits / value package: Show that developers deliver much more than just profit, that they consider local needs and deliver long term value to the community
- b) Accountability: Show that there are effective mechanisms to hold developers (and the local council) to account on their promises
- c) Public influence: Give the public meaningful input on development decisions, involving them early with limited barriers to entry and actual influence on decisions that matter

These are vitally important to instil trust with the public and preserve democracy. As MHCLG thinks this document is important, they must adopt the simple but essential proposals that will make all the difference.

Conclusion

The planning system is very complex by nature. To simplify it and remove checks and balances, will be to the detrimental to house building where the local economy demands. Democracy, the environment, and climate change will all suffer.

However, that does not mean the system cannot be improved and still retain the positive aspects of the current planning process.

³ <https://www.grosvenor.com/Grosvenor/files/a2/a222517e-e270-4a5c-ab9f-7a7b4d99b1f3.pdf>

There has been TOO much silo thinking in modifying the planning process and is no longer tenable in our global and complex world. It has to be integrated with our aspirations for managing climate change, the environment, biodiversity, food security and scarcity of water. In September 2020, the Prime Minister pledged at the U.N. further 4% of the land dedicated to stop biodiversity decline or species becoming extinct. He said we must turn "words into action" and "agree ambitious goals and binding targets". He continued to say " We can't afford dither and delay because biodiversity loss is happening today, it is happening at a frightening rate. If left unchecked, the consequences will be catastrophic for us all. Extinction is forever - so our action must be immediate."

In endorsing this Pledge for Nature, the UK have committed not simply to words, but meaningful action and accountability. The pledge will be judged now and by future generations on the UK's willingness to meet its aims. The actions must be reflected in any new proposal.

What changes might need to be made?

Market Forces

In our view it is market forces that have created the problem and this white paper will shift more power to the market. We can expect greater disparity between the haves and have nots, not forgetting the huge commercial and financial benefits to landowners and developers.

It has to be remembered that developers are commercial companies and have to be regulated to ensure we get the right houses in the right place in a timely fashion.

We recognise and appreciate that our LPA is working hard with developers to ensure that the housing needs for the borough are met over the next ten years, but they do not have the levers to force developers to deliver the required homes at the right time, rather than land banking. The proposed white paper gives more power to the developers and takes away from the LPAs, parishes and the community. The removal of democracy and introduction of a free market is a recipe for disaster.

In our opinion, some landowners see plots of land as their retirement pension. If sold at agricultural land prices this could be up to £15k per acre, whereas for house building, it could be up to £1m per acre. Is it right that the landowner has the good fortune to command such high prices for no effort on their part? A key question is, how can the casino sums of money for land be brought down to an acceptable level, or does MHCLG wish market forces continue to decide?

Desired Outcomes

The final planning system should not be designed for the convenience for MHCLG, the interests of the private sector, or to be dominated by any particular vested interest.

It must strike a balance in which the housing needs of our communities are met in the most sustainable way, and in which all parts of the community have a real voice in the decision-making process. Though hard to achieve, it must be as far as possible be efficient and effective for democracy, the planning officers, landowners and developers, where the community has trust in the process and outcome.

The planning system should:

- a) Meet the economic needs of the locality, by providing the required homes, public transportation and surroundings for the young, economically active and retirees.
- b) Wherever possible collocate houses and jobs.
- c) Be visionary by taking into account new standards to meet today's and future challenges of climate change; the protection of the environment; and provide sustainable services and utilities.
- d) Provide creative high-quality architecture for people to live, work and play, that is commensurate to the local vernacular.

Way Forward.

The white paper so far has shown cursory interest for local people to have a say where they need homes, where infrastructure is required, protect wildlife corridors, restore biodiversity, stop damage to nature and to decrease air pollution. The proposals have to show real interest in the environment and biodiversity in these planning reforms. Housing and the environment for healthy living can and must coexist.

The white paper refers to the environment as a key component of sustainable place making. We propose that there are four concurrent sub plans being part of the local plan for place making, namely: economic needs; housing needs; infrastructure needs; and environment (biodiversity, climate change and green space) protection.

One publicised innovation is the idea to create “wild belt” designated land across England to help nature recover. This would be ideal to help the prime minister met his new UN commitments.

The Citizen assembly for climate change has been successful. Create an assembly of relevant practitioners and kick start a real revolution to dovetail the environment with house building to create meaningful planning reforms with community participation.

The white paper has missed the mark by not understanding the real problem and glossed over the steps HOW to achieve place making in practical terms. The Raynsford Review of Planning in England is an excellent example of conducting an authoritative review with clear terms of reference, relevant representatives, unbiased assessment of the real problem and producing meaningful conclusions and recommendations.

MHCLG should start again and work with representatives of the planning process and the community instead of what appears to be working against them. The answer has to be plan led and not ideology led, nor left to market forces.

Are the government’s proposals the right approach?

No.

Vision and Problem Statement

The white paper says it wishes to rediscover the original mission, but fails to state what the vision going forward should be. The stated wish list is a list of intentions, rather than a proper achievable vision with measurable objectives.

Where is the problem statement? The white paper should articulate the area of concern and the condition to be improved upon, that points to the need for meaningful understanding, deliberate investigation and documentation of reliable evidence. There is a difference between a perceived problem and the actual problem. Where is the evidence that shows MHCLG have correctly identified and understood the real problem?

Symptoms associated with the problem tend to be confusing when trying to identify the real problem. They are often considered before the real problem is understood, especially when there is a specific government agenda. MHCLG and the task force have not understood the barriers to delivering enough homes, as they have not undertaken an unbiased and industry standard methodical assessment of the problem and symptoms. It appears that MHCLG have avoided getting relevant practitioners on board.

It is extremely important to avoid jumping to solutions until a profound understanding of the current state is achieved. Establishing root cause cannot be over stated. Sadly, in our opinion, the problem

identification process is seriously defective and thus came up with the wrong solution. The tenor of the paper comes over as, here is the solution, now let us find the problem it might solve.

At the end of the day, the proposals are not deliverable. No one has considered the practicality of how the value chain of the processes need to be redrawn due to the wrong composition of the task force, with missing practitioners of relevant disciplines.

MHCLG Task Force Composition.

Examining the MHCLG website, it appears that the task force was made up with from the legal profession; developers; real estate; economist; academician for urbanism; and a scientific adviser.

- a) Where are the planning practitioners?
- b) Where are the masterplan and a large-scale planning designers (like Sir Terry Farrell)?
- c) Where is climate change representative?
- d) Where is the DEFRA representative?
- e) Where is the infrastructure construction representative?
- f) Where is the sustainability representative?
- g) Where is the local council representative?
- h) Where is the community representative, like the citizen assembly for climate change?
- i) Where is the holistic thinking? There is no joined up thinking between departments and draft bills in front of parliament.

In other words, no one from the planning process “coal face” who understands the value chain and could separate the perceived problem from the real problem for housing delivery. Yet MHCLG have put forward proposals that have little bearing on the real challenges we face, but give greater power to rules-based systems and developers for no justification. The wrong solution to the wrong question.

Flawed Proposals.

The proposed “one size fits all” does not work – how can it? In one breath they say the top-down regional strategies and unelected regional planning bodies have been abolished which will empower communities. Now the white paper wants to introduce a central set of policies that will disenfranchise, suppress, and remove localism decision making.

When there is a discussion over simplification of rules, we all know that means watered down the rules with minimal discovery opportunities of the facts. Without the facts, wrong decisions will be made, particularly in the complex world of planning. We disagree that reliance no longer needs to be placed on local plan policies. It is these policies that reflect the ability to provide sustainable infrastructure, the need for protecting the environment and the character of the borough to ensure the right houses are built in the right places at the right time.

MHCLG proposals will marginalise local decision making, and substantially reduce consultation away from councils and our community for deciding where developments should take place and prevent analysing the sustainability of applications.

The proposals would not solve housing needs through dramatically reducing existing planning controls and scrutiny. They would allow an explosion of uncontrolled building on our valuable countryside, as there would be insufficient checks and balances for sustainability; for building homes in the right places; and ensuring minimal impact on the environment and habitat designations.

It must not be forgotten that councils have little or no control over the speed of approved housing delivery, nor to our knowledge any sanctions to place on the developer if they sit on the land. Until this is seriously solved by MHCLG, the country will not move any faster in delivery.

All allocated sites (zones) must undergo critical examination. Without it, how do we successfully measure delivery whilst supporting new long-term jobs and protecting biodiversity, plus building the correct infrastructure and services.

New rules would not require sites up to 50 houses to provide affordable homes by developers. This is a serious step backwards, as this would prevent up to 20 affordable houses being built per site.

Single Statutory Sustainability Test

The MHCLG proposal is for a single statutory sustainability test without unnecessary assessments. Sustainability means meeting the needs of the present, without compromising the ability of future generations to meet theirs. How can one achieve this without the relevant assessments? Any meaningful place-making in this proposal will be based on subjective views and not objective facts. A fatal flaw.

Impact on LPAs and Unitaries.

The proposed LPA work load will shift from the back end to the front end, with the activities falling on the local planning resources that are already in short supply. Where will the additional resources come from and where is the money going to come from? Councils are already in debt due to COVID and will continue to be under financial strain for years to come. Recently Rt. Hon. Robert Jenrick has admitted that LPAs need to be better resourced. Can we assume central government will pay?

Removing Community Involvement.

Very worryingly, there is no single initiative to improve democracy and scrutiny. Only to impose from the centre and let market forces rule. To say the community will be able to trust the planning system again is so misleading. The man in the street will not buy this argument.

The positive contribution the community and parish councils can make has to be recognised. To ignore them is at MHCLG's peril. "Planning for the Future" must not move to a totalitarianism approach, but a participative approach to strengthen local decision-making through building a strong alliance of local authorities and communities.

We all agree that all LPAs should have a local plan in place. However, the new process squeezes out the local community who have the local knowledge of their specific parish. This will result in zero confidence by the community in MHCLG, the developers, the local plan and future applications. To create more resilience through these proposals is not going to be achieved.

Building by centralised control and driven by market forces would be cataclysmic. LPAs and parish councils will have little or no influence over where houses will be built to ensure they meet the needs of our community.

This is known as "dismantling localism" and "confiscating democracy".

Access to Plans.

It is vital to be informed about plans and planning proposals in a variety of ways: social media, online news, newspaper, by post in addition to the methods employed at present. To only select one method would target only one sector of the community. The proposal to move to a digital first approach, by moving from documents to data is a good objective and can be adopted whatever planning system we chose. However, this in itself does not lend to better place-making or greater democracy. Transparency is to be welcomed, but not at the expense of public engagement.

Contributing to Planning Decisions.

Contributing views on local plans and applications is part of a mature democratic process. It is both healthy and essential to ensure that decisions are not regretted for generations to come.

This white paper reduces democratic oversight of planning committees, it replaces a system with a light touch fast-tracked system granting automatic planning permission for a type of building within the designated zone. In essence this reform will exclude and restrict key stages of the planning process, and will make it harder for people to contribute their views to planning decisions. Growth

and renewal zones appear to have no oversight or community consultation, whereas 'protected areas' would have some retention of a planning process community involvement. This is unacceptable.

With this scheme, community voices will be drowned out by restrictive rules, shortened consultation periods, and unable to present local views on specific applications where mitigation actions are required (often unknown at the LPA level). Developers have the opportunity to hide issues so there is never a debate about necessary mitigation.

The whole white paper will reduce community engagement and the democratic process. The outcome will be a shift towards authoritarianism. It is naïve to think that one can achieve democracy through digitisation. Local people need to be more included from place making through to application decision making. It is important that the LPA and the community get the developments they need and in the right places.

In seeking to build 300,000 homes a year, is the greatest obstacle the planning system or the subsequent build-out of properties with permission?

Permissions Verses Delivery

Councils, commentators and most academics have emphasised that the current planning system today is not the root cause of low numbers of housing delivery and houses not being affordable. Despite some faults in the current system, it does embrace democracy by allowing LPAs and parishes.

Latest figures show that 2,564,600 units have been granted planning permission by councils since 2009/10 while only 1,530,680 have been completed. The number of planning permissions granted for new homes has almost doubled since 2012/13 with councils approving 9 in 10 applications. For 2018 / 19, the number of units granted permission was 361,800, whereas the number built was 213,860.

Over the last 10 years the build out rate is between 30% to 40% less than the permissions given.

These figures show that the lack of permissions is not a barrier to house building. The number of homes granted planning permission has far outpaced the number of homes being built.

Focus has to be on the roll out of houses. The key to a successful build programme is to stop land banking by some developers. MHCLG can tinker with the planning process as much as they like, but until the behaviour of developers is managed, the situation will remain the same.

It has to be remembered that developers owe their allegiance to shareholders and not the community. The white paper focus should be managing the behaviour of developers, to remove the temptation of manipulating the supply and demand economic model to their benefit. Perhaps the idea of charging developers with council tax irrespective of whether the homes have been built or not, say after a two-year period of time since permission was granted.

Housing Algorithm

The housing algorithm is flawed and will undermine local democracy and the right of communities to have a strong voice in what gets built in their locality. Algorithms can never be a substitute for local knowledge and decision-making by councils and communities who know their area best. Housing should be supported by genuine evidence, not arbitrary spreadsheets which ignores the physical and economic world. The current formula will allocate more housing to higher priced areas such as the south and east, while reducing ambitions for the Northern Powerhouse.

This algorithm as it stands, is a weapon of "Mass Destruction" on the countryside.

Homes should be driven by local needs based on economic activity, infrastructure, the environment and true demand. This algorithm will not “level up” the country as demanded by our Prime Minister.

How can the planning system ensure that buildings are beautiful and fit for purpose?

What is beautiful? Beauty is in the eye of the beholder. If we mean aesthetic, then we can focus more clearly on architectural design and how it fits in with the surrounding environment, both natural and built. Architecture Design is the process and the product of planning, designing, constructing and devising buildings and other physical structures for public good. It has to be attractive for potential residents to live; avoid becoming a slum of the future; and not be alluring to antisocial behaviour.

Focusing on design codes and crime prevention through environmental design (CPTED) are two important ingredients for a so called “beautiful” design.

Neighbourhood plans, local plans and a safety net of national design codes is the way forward to protect the community from failed architectural designs. Unfortunately, some past proposals by developers in our town have been far from optimal. They have only become acceptable due to the hard work of the parish council fighting for an acceptable vernacular for the locality. Builders naturally want to keep cost down by using easy to build design and vernacular, resulting in sacrificed quality design.

A major concern is that design codes have focused on insulation for so long, it has forgotten how to keep homes cool in the summer months - this will get worse with climate change. Do all homes now have to have air conditioning installed as standard, or will homes be designed better? This is a major omission which must be addressed with urgency.

What approach should be used to determine the housing need and requirement of a local authority?

Unfortunately, housing need is not looked at in a holistic manner. We as a nation require social, rented and private ownership of housing. It is good to have an aspiration of private ownership, but MUST not ignore social and rented needs.

As mentioned earlier, housing algorithms do not work as housing needs must take into account, economic growth of the locality, demographics, infrastructure that can be afforded or is in place, sustainable transport and services that can be affordable to be put in place or already exist.

What is the best approach to ensure public engagement in the planning system?

The principle of public participation in planning is essential, as it is they who are affected by a decision and therefore have a right to be involved in the decision-making process.

With the high profile of climate change, biodiversity and other critical topics, these are very much in the general public’s sight, therefore planning consultation is critical in ensuring that the best possible outcome is achieved for housing the population and protection of our planet.

To disengage with the community is the worst possible scenario and must be avoided in any new planning proposal. Trust is the key word and the planning process must ensure this happens. Local plans, neighbourhood plans and planning applications must involve the community, as planning is for the community and for the benefit of the community, both at local and national level. Raynsford Review and the Grosvenor Report very much emphasise that point.

What role should modern technology and data play in this?

Harnessing digital technology is fine for those who are computer literate. What about those who are not computer literate, or cannot afford to purchase digital technology? Without the MHCLG answering and mitigating this question, you will disenfranchise a large sector of the community.

When asking for opinions, social media can be very divisive with extreme views by a tiny minority of the community. This will distort the planning message and put people off communicating their views so they are not victimised.

You cannot expect the community to look for information about plans, they must be provided with information from the local council proactively. It is the old perpetual argument of “push” and “pull” method of communicating. The notice on the lamppost pushes out information. How will the majority of the community know there is a planning application without those notices? Yes, you can sign up online for notification to pull information, but I would imagine that is for a very small proportion of the community.

How can the planning system ensure adequate and reasonable protection for areas and buildings of environmental, historical, and architectural importance?

Environmental Protection

Though the white paper mentions the Defra 25-year environment plan, how is it going to be linked? So often aspiration falls on stony ground and withers, potentially this will be the case.

Within the white paper there is a section on effective stewardship and enhancement of our natural and historic environment. NOT one question on this subject was asked within the consultation. This speaks volumes on the importance MHCLG has placed on this subject. Do we want the community to jump to the wrong conclusion that this white paper is just paying lip service? The environment will be side-lined, as some developers attempt to do at present. It is up to parish councillors and members of the public to point out the evidence and show it does not comply with the NPPF and local plans. The LPA does not have the resources or knowledge to know when the developer has not disclosed full information.

Environmental assessments are not quick activities as there are so many elements to consider and investigate. Quick can and will probably mean cursory, which would be totally unacceptable.

MHCLG wants to replace the environmental impact assessment (EIA) process with a ‘simplified process’ for assessing environmental impact. Little detail is provided and developers will have the ability to ignore environmental concerns with more impunity. How will the simplified process continue to provide the same level of environmental protection? All zones must have areas designated within them that shield local landscape character areas, local wildlife sites, etc from development.

Section 41 of the Natural Environment and Rural Communities Act, came into force in 2006, which requires the Secretary of State to publish a list of habitats and species which are of principle importance for the conservation of biodiversity in England. This list is maintained and updated by the JNCC. Any new planning law has to refer to this list as potentially it will dictate areas that have to be protected as sub areas within growth and renewal zones, and / or a protection zone in its own right. This protection must be reinforced in the new planning law, otherwise what is the point of having these local designations if they are not enforced? Protection with no teeth is no protection at all.

Historical and Architectural Protection

A number of historic towns have conservation areas designated. These together with supplementary planning documents and area action plans must be reinforced within any new act of parliament. The white paper has side lined these important planning tools.

Countryside

The countryside is not just about beauty, but often is a positive economic contributor in its own right to GDP. This could be farming for food security, tourism, leisure, exercise, mitigation against climate change and many other positive economic aspects.

What changes, if any, are needed to the green belt?

The white paper states that Protected Zones would include sites and areas which, as a result of their particular environmental and/or cultural characteristics, would justify more stringent development controls to ensure sustainability. This would include areas such as Green Belt, Areas of Outstanding Natural Beauty (AONBs), Conservation Areas, Local Wildlife Sites, areas of significant flood risk and important areas of green space.

Unfortunately, we know that inspectors allow development on green belt.

- a) Would protected zones be acceptable within growth zones to ensure sensitive countryside is not destroyed?
- b) Does the definition of green belt need to be redefined as it is no longer the Holy Grail?
- c) Do we need to redefine what an AONB and SSSI should be?

The community needs faith that these protected areas mean protection with no development.

What progress has been made since the committee's 2018 report on capturing land value and how might the proposals improve outcomes?

The 2018 report is very well written and explains the issues involved in assessing current land use value and hope value. The point of cross-party consensus is very well made.

Reading the white paper, it comes over as the authors have not grasped these issues and does not convey their understanding of what outcomes they wish to achieve, which is multifaceted. Questions:

- a) Do we want to reduce hope value so that houses become more affordable?
- b) Do we want to ensure that any infrastructure and services uplift is paid for by the developer via S106 or other means?
- c) Do we want the capability to have cost effective compulsory purchase order mechanisms for regeneration, strategic infrastructure and social housing?
- d) Do we want to prevent developers using viability tests, so they do not have to pay for affordable housing?

Our view is yes to all those questions above, but there is no obvious easy answer to achieve these outcomes.

What further steps might also be needed?

Without overstating the government's wish to build the right type of homes in the right places at the right time, a number of questions have to be answered to manage the outcomes.

- a) Where will the economic power houses be developed in the short to long term?
- b) Where will be the centres of employment be? This is where homes will be required.
- c) What type of infrastructure is required and projected cost?
- d) Can sufficient utility services of water, electricity, flood controls, etc be provided in those areas?
- e) Which areas should be ring fenced and protected for the benefit of biodiversity and climate change?
- f) Which areas should be preserved for food security, tourism, leisure and well-being?
- g) What are the housing needs for economically active adults, families and retirees by location?

Any proposed planning systems must satisfy the above outcomes. The planning system has to be a democratic facilitator and not a bureaucratic inhibitor.

October 2020