

Written evidence submitted by Policy Connect [FPS 014]

This document forms Policy Connect's response to the Housing, Communities, and Local Government Committee's call for evidence on the Future of the Planning System in England.

Policy Connect is a membership-based, not-for-profit, cross-party think tank. We bring together parliamentarians and government in collaboration with academia, business and civil society to inform, influence and improve UK public policy through debate, research and innovative thinking, so as to improve peoples' lives.

We lead and manage an extensive network of seventeen all-party parliamentary groups, research commissions, forums and campaigns in key policy areas including: health; education & skills; industry, technology & innovation; and sustainability. We shape policy in Westminster through meetings, events, research and impact work.

Policy Connect is submitting written evidence based on our longstanding expertise in the policy areas of Sustainability and Accessibility. We have drawn on the wide-ranging evidence and stakeholder input from industry, academia and the third sector we combine by managing the All-Party Parliamentary Sustainable Resource Group (APSRG); the Sustainable Resource Forum (SRF); the All-Party Parliamentary Climate Change Group (APPCCG); Carbon Connect (CC), the Westminster Sustainable Business Forum (WSBF) and the All-Party Parliamentary Group for Assistive Technology (APPGAT). We have responded to the questions from the call for evidence that are most relevant to our work across these areas.

1. **Is the current planning system working as it should do? What changes might need to be made? Are the Government's proposals the right approach?**

We welcome the Government's focus to put "sustainability" at the heart of the new proposals. However, "sustainability" is a broad term, encompassing a wide range of considerations that need to be taken into account. The Government should therefore provide further detail on what constitutes their vision for sustainable homes and places and what implications this will have for the planning system.

We have undertaken a number of pieces of recent research that will help to deliver on the Government's commitments to sustainability, many of which will have implications for the planning system in England.

Heat

The planning system should include zero-carbon heat as an objective, with low-carbon heat as a priority by 2025.

Our Future Gas Series sets out a route-map through exploring the role of gas and the gas grid in the transition to low carbon heating. In particular, the third part in this series, [Uncomfortable Home Truths](#)¹, highlights the changes to new and existing homes that will be required to meet the Government's net-zero target by 2050. Its recommendations on low carbon heat should be taken into the planning system.

¹ Uncomfortable Home Truths: Why Britain urgently needs a low carbon heat strategy, Policy Connect, October 2019

The Government's Clean Growth Strategy aims to phase out high carbon heating in off gas grid homes this decade and the Future Homes Standard will require new homes to include low carbon heating on its introduction in 2025 (although we have recommended bringing this deadline forward). These policies will have knock-on effects for the way that our homes and communities are designed. A reformed planning system should be sympathetic to the changes needed to make new homes carbon-neutral. Planning policy and design guides should acknowledge the fact that the homes of the future may need to look and operate differently to accommodate features such as heat pumps, connections to heat networks, and passive cooling systems.

When planned well, heat generated by Energy from Waste (EfW) facilities can also provide low carbon heat to surrounding communities. Our report, [No Time to Waste](#)², explores the opportunities for this in detail and its recommendations should also be taken into the planning system. Our work highlights the challenges in utilising the heat generated from EfW, given current planning restrictions, which curtail the location of EfW facilities. A reformed planning system should consider the mechanisms available to maximise the use of the heat generated from the EfW process such as concession zoning, permitted development, and local planning authority requirements.

Flooding

A parallel priority for the planning system should be water efficiency and flood resilience. Water and energy efficiency are of course also inextricably linked.

Our reports, [Bricks and Water: A plan of action for building homes and managing water in England](#)³ and [Bricks and Water: Building resilience for England's homes](#)⁴ consider the risks to homes and communities from flooding. Currently, one in six properties in England are at risk of flooding and this is set to increase as a result of new development and climate change trends. The Government's proposals for planning reform suggest that areas of flood risk would be excluded from *Growth* areas and designated as *Protected*. However, the Government does not specify how it defines areas of 'flood risk'. It is not sufficient to only designate the areas of highest flood risk as Protected (i.e. flood zone 3, defined as having a 1 in 100 or greater annual probability of river flooding, or a 1 in 200 or greater annual probability of flooding from the sea in any year), as this does not take into account the effects of climate change, which will increase the size of these areas in future. As a minimum, conservative allowances for climate change should be taken into account when specifying Protected areas and land with medium flood risk (i.e. flood zone 2) should also be considered for inclusion.

The National Planning Policy Framework (NPPF) states that '*Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk*'. However, in spite of this robust statement, the amount of homes at high risk of flooding has more than doubled since 2013, reaching a total of almost 85,000⁵. The Environment Agency also report that the number of properties in the floodplain will double again over the next 50 years⁶, if current planning outcomes continue. As Government guidance is having minimal impact in the real world of house-building we strongly recommend that Planning Policy is strengthened to prohibit all but essential infrastructure within the floodplain.

² No Time to Waste: Resources, recovery and the road to net zero, Policy Connect, July 2020

³ Bricks and Water: A plan of action for building homes and managing water in England, Policy Connect, June 2018

⁴ Bricks and Water: Building resilience for England's homes, Policy Connect, October 2020

⁵ 1 in 10 new homes in England built on land with high flood risk, The Guardian, February 2020

⁶ Long term investment scenarios 2019, Environment Agency, May 2019

Overall, we recommend that a reformed planning system should deliver flood resilient, net zero-compatible buildings and places that both mitigate, as well as adapt to the impacts of climate change.

5. What is the best approach to ensure public engagement in the planning system? What role should modern technology and data play in this?

In order to ensure accessibility for all, planning documents, such as local plans and application details should be digital and follow agreed web standards. These standards should be compliant with the accessibility regulations⁷ which came into force in September 2018 to ensure all public sector websites and online content are accessible to disabled people. Digital mapping tools and features accessed using a smart phone should also be compliant with these regulations. Where third party technology companies are used to deliver these services, they should be subject to the same accessibility regulations required for public sector bodies as these are in effect public services. This requirement for the private sector to deliver public services to the same accessibility standards should be specified as part of the procurement process. The Ministry for Housing, Communities and Local Government should work with the Government Digital Service to develop appropriate guidance and promotional materials to ensure public bodies and third-party technology companies are fully aware of their legal obligations in this respect.⁸

October 2020

⁷ Understanding accessibility requirements for public sector bodies, May 2018

⁸ The Cabinet Office's Government Digital Service is leading the government's cross-departmental work on the implementation and promotion of the regulations