

Written evidence submitted by Richard Gilyead [FPS 022]

I am a resident of Saffron Walden who has been involved in planning issues over the last 7 years as our local council has struggled to complete a Local Plan. They have consistently ignored the results of public consultations despite valid objections being raised on the grounds of unsustainability, traffic impact and air quality issues. The plan has twice been rejected by the Planning Inspectorate on grounds that closely match the objections of residents. We now have a new administration who are trying hard to create a third version of the plan that will genuinely involve local communities and pass inspection. However, the planning system seems to be developer-led and the over-ambitious housing targets, set by central government, are making this task almost impossible.

The previous administration gave permissions for many developments with inadequate S.106 agreements so there is a large infrastructure deficit to be dealt with. Some permitted developments are progressing so slowly that the S.106 agreements have expired. There is a lack of overall master planning and too many small, uncoordinated developments. Less than half of the 40% affordable housing target has been achieved.

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?*

The current planning system fails to deliver on many counts: the low number of houses delivered; the small number of truly affordable homes; the poor sustainability of development sites; the inadequate quality of building to ensure longevity; lack of indoor and outdoor space requirements for families; inconsistent visual appearance which is unsympathetic to local vernacular styles; few green spaces for sports, relaxation and leisure; and insufficient infrastructure to support developments.

There are many changes that are needed to improve the planning system and these need to be based on a genuine desire to deliver real sustainability and housing that is within reach of people on less than average incomes. The NPPF is not delivering this today.

The government's proposed approach is in completely the wrong direction. Local authorities would have no powers to force developers to deliver on the plans they submit. There are perverse incentives in the proposals that would encourage developers to slow delivery so that even more areas must be designated for development in the next round of Local Planning to meet central housing targets. There are no developer penalties for non-delivery. On the contrary, land-bank values, and consequently developer company share prices, would be boosted by delaying builds and securing more designated sites.

A centralised "sustainability test" would be unable to take local conditions into account. This would be critical for transport, and air quality, assessments.

2. *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?*

All the evidence points to the primary reason why homes are not built being that developers are not delivering on the permissions they already hold. It is in their financial interest to delay delivery until market conditions allow for maximum selling prices.

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

By giving residents legal powers in Neighbourhood Plans to set and enforce local standards for visual appearance, external materials and architectural features. Local people know best what defines the identity of their area and what would fit in.

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

The housing needs of an area must be determined by the local authorities working together with regional planners. The “internal” level of district population growth should determine a baseline housing figure including affordable and social housing targets. If there is a need to support “external” migration from other areas then this should be a separate target with additional infrastructure funding support.

The area where I live is a commuting centre. This means there is very high demand from nearby cities for homes and the “affordability index” is very high. Local people have no hope of competing in the housing market. In fact, many lower-paid workers have been forced to buy elsewhere and commute back in. Thus there is a large exchange of workers across our borders every day and our per capita carbon footprint is one of the worst in the country.

The government's proposal to take the affordability index into account in calculating demand means there will be an endless ratcheting up of housing targets and the affordability index. Our area has built a record number of homes over the last decade yet house prices have soared by more than the national average and the affordability index is actually worse.

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

Planning should be open and transparent. District, town and parish councils must be actively involved in planning. Neighbourhood Plans must be encouraged and integrated into Local Plans so that participants feel they are really making a difference. There should be open debate about difficult decisions.

Technology may be able to help with some of this. Mapping technology that can display layers and allow drill-down into more detail can help put plans into context. Discussion group software can permit moderated debate and commentary on documents. There are still many residents, however, who do not have access to, or the necessary skills to use, such technology. Technology is an aid, but not a replacement, for public engagement. Walk-in “town hall” events would still be needed to capture a broad range of views.

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

Each area should have its own register of locally listed, valuable buildings. This register should have legal force in planning decision-making. There should be substantial penalties for owners who deliberately allow such buildings to decay in the hope of receiving permission to replace them. The owners of all listed buildings should be able to reclaim VAT on building maintenance.

There should also be a stronger test on the knock-on effect of nearby developments on such buildings. We have many historic buildings that are being shaken to pieces by the traffic generated by developments on the other side of town.

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

The meaning, and purpose, of “green belt” may need to change. Instead of just being a visually appealing buffer for cities, the “green” should imply a carbon-negative sink for city emissions. Thus all building must be to the very highest environmental standards. Settlements should be energy

producing overall. Mass tree planting should be mandatory. Each district should have a high carbon reduction target and extra funds to invest in necessary environmental improvements.

8. *What progress has been made since the Committee's 2018 report on capturing land value and how might the proposals improve outcomes? What further steps might also be needed?*

I am not aware of any progress in improving the capture of land value. The current proposals seem to weaken local authority control over planning permissions. The net effect is likely to be a substantial increase in land value of designated development areas at the point of approval of a Local Plan. This will boost the assets of landowners and developers with no obligation to deliver the actual housing. The idea of basing infrastructure contributions on "development values" is an open door for developers to manipulate their finances to minimise such payments, much as we have seen with "viability assessments" being used to avoid contributions in the past.

The government has rejected the recommendation to implement a Local Infrastructure Tariff which would enable local authorities to benefit from excessive land value increases caused by external migration (see my earlier comments on commuter areas). Neither S.106 nor CIL have been effective in delivering the funds needed to build sustainable infrastructure in advance of need. The current proposals are significantly worse since any contributions would only start after homes are built. This would be too late to influence modal transfers to new transport routes for example.

If new settlements are controlled via National Infrastructure this will remove local control of such developments with no guarantee that land value capture will benefit local residents.

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