

PLANNING 2020 WHITE PAPER RESPONSE FROM HUNGARTON PARISH COUNCIL

The proposed 'housing algorithm' that will drive the location and number of houses to be built across England is decoupled from a transport planning policy which directly addresses climate change. What is proposed in the Planning Reform will promote a centrifugal effect of extensive house building further and further away from urban hubs. This is an American model of car-based house construction following road routes out from town and city rather than following the best practice of integrating the construction of homes with environmentally sustainable transport. The best way to achieve this is to locate new homes in places which are directly and easily connected up with places of employment, retail, services, family and friends, culture, entertainment, sport and exercise. Car-based housing of rapidly expands into greenfield sites and expands the road network through more greenfield sites. House building needs to be focused upon brownfield sites close to urban centres, linked to them by efficient, low-carbon transport. All forward strategic planning to do with housing must incorporate the pressing de-carbonisation goals outlined in the Paris Agreement of order to confront the ecological emergency and to raise the bar set in Paris and Katowice, by attempting to reduce carbon emissions to zero by 2025.

2. The kind of zonal planning outlined in the Planning Reform does not provide for the regeneration of towns and cities which is so urgently needed. We have seen how the Enterprise Zones of the 1980s did nothing for town and city centres but resulted in a proliferation of out of town business parks, industrial sheds at motorway junctions, built to minimum standards. A revival of the policy in 2011 was shown in the Report on Enterprise Parks to have failed to deliver a jobs boost. The best way to achieve increased house building is to work with local knowledge and local strategic plans. Again, these plans have to integrate housing development with economic development and the de-carbonisation goals outlined in the Paris Agreement and Katowice, by attempting to reduce carbon emissions to zero by 2025. These decarbonisation goals are international and national but they are also local to us, as Leicestershire and Leicester local government committed themselves to fighting the Climate Emergency last year.
3. The Planning Reform erodes democracy. It centralises power to government in Westminster and to construction companies. The Reform will cut democratic input into the planning process by removing the opportunity for objection at the final consent of a planning application, after the initial planning stage which constituents like myself would more than likely be ignorant of. The Reform excludes the voices of constituents and stitches up a too close relationship between government and construction business at a time when trust in government, politicians and the electoral process needs to be strengthened. We must counter a popular disenchantment with democracy and the rise of the far right, internationally.
4. Focusing upon town and city renewal, housing development addresses the economic and material decline of UK towns and cities by making them economic and cultural hubs better connected to the homes of a demographically diverse population, capable of readily engaging with the development of enterprise, intellectual innovation connected to universities and colleges in mostly urban settings, and cultural and service use. Addressing the need to rethink the economic and cultural bases of urban areas, involves holding the most creative and innovative individuals close to urban centres, rather than their distancing ever further out

from urban centres.

5. Zonal planning systems are disastrous because they dis-integrate residential from business, services and cultural life. The development of housing projects away from town and city hubs drains resources from town and city centres, making them increasingly unattractive, undesirable, and used by highly segmented demographics – determined by poverty, and ethnicity, for example. The planning for housing development in towns and cities needs to be in the hands of local government, building social integration with prosperity. Brownfield sites and former industrial wasteland, in towns and cities need to include hi-spec residential quarters and hi-tech, green enterprises, holding onto its former university students and the most able, re-branding living in the city or town as prestigious, breathing life into the whole city through job development, and attendant service and cultural sectors, to the benefit of all. It is local government, not central government and construction companies, which should be accountable for such integration of a town or city. Government plans to extend the current exemption of small sites from having to make Section 106 payments toward affordable housing will reduce the number of affordable houses built. Together with zonal planning, this will exacerbate the ghettoization of the poor who will continue to rent and not buy their own homes.

6. The Planning Reform undermines the role of great swathes of countryside which will not achieve the designation of being a 'Protected Zone'. It is the countryside in general which provides the spaces which are safe and beautiful for the pursuit of recreational and sporting activities, including cycling, walking and horse riding. Zoning of great swathes of countryside as 'Growth Zones' will mean that these activities cannot go on successfully in them as once they could, amongst car traffic, pollution and noise, and in increasingly built-up areas. The importance of what is popularly termed well-being is established, the concerns expressed by many professional bodies about the deteriorating mental health of children, young people, the elderly and many others is well known, the urgent need for physical exercise in combatting obesity and the link to obesogenic environments is known too. Many of these recreational and sporting activities require the breathing space of a green-belt. The planning proposal undermines it and threatens the well-being of all of those who turn to it as an invaluable resource for health and happiness. It is the communities close to these green areas not built upon and the local authorities responsible for them and local M.P.s and local government accountable to their electorates, and not central government and construction companies who know these areas and their importance to local people's well-being.

Consultation Questions from Planning for the Future White Paper

Pillar One – Planning for development

1. What three words do you associate most with the planning system in England?

Local, democratic, permissive

2. Do you get involved with planning decisions in your local area?

[Yes / No]

Yes.

2(a) If no, why not?

[Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

3. 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?

All of the below, but also by posting in public places such as parish/local notice boards and lampposts. In conservation areas immediate neighbours receive letters. We think this is good practice and should be extended. It is important to avoid excluding people by using a digital-only approach.

We do not understand why Local Planning Authorities (LPAs) appear to use different web platforms (?) and policies for public access to planning information. Many are very tortuous to access and authorities differ in what they choose to post online. For example, it is easy to access current and historic plans and their associated documents on Harborough District Council's website, however Leicestershire County Council does not make responses and comments (both statutory and local) accessible. This is poor practice in our view. To improve this it would be sensible to use a standard system.

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

4. What are your top three priorities for planning in your local area?

1. The environment, biodiversity and action on climate change. Through the Neighbourhood plan process (questionnaire) we know: Thinking about what's important about living in Hungarton, 97% of respondents said the Environment; 85% scored Environment as very important.

2. Another priority in the view of respondents to the questionnaire, was that the type of housing needed in the Parish is:

- **2-3 bedroom family homes (68%)**
- **Housing for young couples (61%)**
- **Housing for the elderly/disabled (43%)**

3. There was strong support for protection of existing heritage buildings and green spaces.

[Building homes for young people / building homes for the homeless / Protection of greenspaces / 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]

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

No.

We are concerned that the proposals limit LPA and public participation in decisions. As we understand it there will only be one opportunity to engage – the 6 week consultation when the LPA defines the zones in its new fast-track local plan.

We are especially concerned that the amount of land zoned for growth and renewal will be contingent on an algorithm (New Standard Methodology) that massively increases the housing requirement for Harborough district while being unrelated to local need. The algorithm sets an annual requirement of 1228 homes compared with 550 under the current standard method in Harborough District, while in the case of Leicester there is a significant reduction to 1120 homes p.a. from 1734 under the current standard method.

Leicester is the largest city without a Green Belt and the county does not have the benefit of national protective designations. We fear that much of our unique countryside landscape could be designated for growth.

We think the proposals allow developers too much latitude. As has been frequently evidenced, it is not the planning system that is preventing homes being built, but land-banking by developers.

6. 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.]

No.

The streamlining proposals appear to minimise public scrutiny and promote the ambitions of developers and landowners.

We are very concerned by the proposed centralisation of development management policies and determining housing requirements. LPAs are much better placed to understand local needs and to ensure appropriate development. Harborough District Council a good example of such an LPA.

- 7(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.]

Not sure.

Hungarton Parish Council has made a Declaration of Climate Emergency and there is strong engagement from the community with its Environment Sub-committee. We would like to see a strengthening of measures to tackle climate Change, this means thinking in-the-round to include transport, waste, minerals, water etc as well as energy-efficient housebuilding. Our concern is with how this proposal would work in practice and whether all the elements of sustainability (environment, economic and social) would be included. We do not think simplification is appropriate in this context.

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

We do not understand why Government wants to do away with Duty to cooperate. There is no argument in the Planning White Paper (PWP) to justify this.

8(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.

However the Government's housing requirement appears to be motivated by a commitment to provide 300,000 homes pa although this target is not supported by Office for National Statistics (ONS) projections on housing need. In February 2020 The Local Government Association said its analysis found 2,564,600 units had been given planning permission since 2009-10 and 1,530,680 had been constructed. That means developers have failed to build 1 million homes. LPAs should be given powers to enforce building once planning has been granted, rather than just releasing more land.

ONS projections should be used instead of the algorithm and the need for a very substantial proportion of homes to be affordable needs to be factored in.

Hungarton Parish council is very concerned about the massive increase in housing proposed for Harborough under the proposed New Standard Methodology (see also 5. Above).

8(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.]

Not sure.

The objectives are unclear. We consider that the focus should be on creating affordable homes within existing urban areas, wherever possible utilising brownfield sites which are becoming increasingly available due to commercial closures.

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

NO.

The contribution of LPAs and the public with regard to zoning decisions is paramount, yet severely limited by this proposal, which presents developers with an open ticket to build without due and reasonable checks and balances.

9(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.]

NO.

The contribution of LPAs and the public with regard to zoning decisions is severely limited and presents developers with an open ticket to build in both Growth & Renewal Areas. If growth zones are to be based on the flawed New Standard Methodology we would be even more concerned. Development constraints within Protected Areas should be strengthened.

9(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.]

No.

Population & Housing forecasts are not sufficiently accurate to justify bringing forward new settlements. Such forecasts require ongoing validation of the assumptions on which they are based and adjustment where real-world data show that key premises no longer hold true. Indeed, contrary to current forecasts, many models now suggest a future decline in population growth.

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

No.

The proposals are skewed in favour of development and reducing public participation. Faster and more certain decisions may be beneficial but not at the cost of removing safeguards to protect public interests, including public goods.

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

Yes, but they must also be available in other formats.

Not everyone has web access to or prefers to see Local Plans on the web. Having digital access only is likely to constitute indirect discrimination

under the Equalities Act 2010 and, as such, would be illegal. See also answer to Q3.

12. 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.]

Not sure.

Speeding up the process is desirable but not if the cost is the denial of LPA discretion regarding local policy decisions and where development may take place. A statutory 30-month timescale would also mean less consultation with communities, which is highly undesirable in any modern democracy.

About 90% of applications for planning permission are currently approved in England under the current discretionary system. The proposed simplification will likely not help to balance community needs against those of developers.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

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

Yes.

Emphatically. Hungarton's Neighbourhood Plan was made in 2017. Almost 50% of the community engaged with the process. In Harborough 21 Neighbourhood Plans have been made and a further 14 are underway.

Introducing Neighbourhood Planning under the Localism Act has been one of the successes of the Government. But we do not understand how the zoning proposals put forward in the PWP will impact on our fully consulted and inspected Statutory Plan. Communities will feel utterly disenfranchised if the proposals put forward in the PWP threaten carefully won protections and carefully negotiated development within Neighbourhood Plans.

13(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?

Consultation on our Neighbourhood plan included two days of public displays and consultations on the Plan and a detailed questionnaire. We believe that there is considerable value in a physical gathering (coronavirus permitting) that allows for an exchange of ideas. A rich and productive dialogue could not be achieved in the same way using digital tools (aside from being discriminatory – see above). Our questionnaire could be completed online but a significant proportion of the community chose to respond on the paper version.

The majority of Neighbourhood Plans we have seen already contain design guidance which reflects community preferences and references the local vernacular.

14. 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.]

Yes.

Whilst the Planning System is targeted as the cause of 'build out' delays, they are most often due to landowners and developers delaying the start of building until their individual or corporate fiscal objectives are met. . LPAs should be empowered to penalise this practice.

Pillar Two – Planning for beautiful and sustainable places

15. 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]

Neighbourhood Plans & Village Design Statements have been effective in securing contextually appropriate developments which respect local character and housing need. However, in their absence, developments are characterised by standard house types which fail to reference the local vernacular and are dominated by large executive homes, priced beyond the means of local people.

16. 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]

**Less reliance on cars;
More Trees and a biodiverse environment;
Community initiatives to tackle climate change, including energy-efficient new buildings.**

17. 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.]

Yes, provided the guides and codes are developed with full local public participation and in accordance with existing Neighbourhood & Local Plan Design Guides

18. 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.]

Not sure

Not sure about a new body to 'police' design codes and better building. Design criteria should be formulated locally, preferably through the Neighbourhood Plan process. A chief officer for design & place making

within each authority may be helpful but must be guided by public consultation.

19. 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.]

Yes. However, well designed affordable homes (both to buy and to rent) should be a clear priority.

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

Not sure. The process for establishing design codes as the basis for fast tracking is unclear and seems to lack sufficient provision for public participation.

Pillar Three – Planning for infrastructure and connected places

21. 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]

**Protection of the environment/countryside
More affordable housing
Design of new buildings**

- 22(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.]

Not sure. Two systems are clumsy but proposals to remove the facility for LPAs to attach specific infrastructure obligations to consents weakens local participation and could result in hard-to-fix, long-term problems.

- 22(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]

**Set locally. Localisation is always to be preferred.
The question presumes support for a consolidated levy.**

- 22(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.]

The levy should aim to capture more value for investment in local infrastructure, local affordable housing and local communities

22(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.]

~~{don't know about this}~~

Not sure. If the amount and delivery date of the levy were determined and not subject to change, then this proposal would seem acceptable.

23. 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.]

Yes. Permitted Development should not be exempt from the collection of a levy for necessary, associated infrastructure improvements.

24(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.]

Yes. The clear need is for more affordable housing and the levy should aim for higher affordable housing targets than at present.

24(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.]

Not sure. These proposals are at least as complicated as the investment measures they seek to replace.

24(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.]

Not sure. These proposals are at least as complicated as the investment measures they seek to replace.

24(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.]

Not sure. The process seems focussed on obscure financial arrangements much less than on satisfying the need for quality affordable housing.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

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

Yes. Local authorities should be free to prioritise local needs.

25(a) If yes, should an affordable housing 'ring-fence' be developed?

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

Yes – local authorities should have as much discretion as possible. An affordable housing 'ring fence' would be welcome.

26. 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?

Yes.

The proposals do not have sufficient regard for potential discrimination against people with protected characteristics in terms of engagement with planning. The Government needs to take advice on the best ways to engage with different groups.

There appears to be nothing in the proposals about provision of housing for the elderly or people with disabilities. Some thought needs to be given to the housing needs of people in protected characteristics categories.