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THE PLANNING WHITE PAPER: A Strategic Overview from CPRE Avon and Bristol

1. Key Messages

1.1 The Housing Numbers game

In our view the 300,00 target for new houses is essentially a “political” number. We do not see links to local or national economic indicators, nor to locally assessed evidence of housing need. There is, however, a major need for (genuinely) affordable homes and it is that on which we should focus. While accepting that it is the government’s aim to increase home ownership, in the current imbalance between earnings and house prices (particularly in the SW of England) this is at present undeliverable. A target to meet the affordable housing need, combined with smoothing of the planning system to help local authorities and developers to deliver them, would be far more deliverable; and less controversial in meeting the Government’s “Levelling Up” objectives than the overall housing figure.

1.2 Providing social/affordable homes

As presently set out, the White Paper proposals will not produce either social or affordable homes in the right places, connected to the appropriate services or indeed in the right numbers. We consider that a much sharper distinction needs to be drawn between “social” and “affordable” housing. The problem with the latter is that it can never be affordable for many of the people who most need new homes. (See “worked example in footnote below*”).

* For example, someone on an income of £20,000, living in a part of the country where the average house price is, say £260,000 would be lucky to secure a mortgage offer in excess of £60,000. Thus, even if the house price was artificially lowered by as much as 50% (i.e. £130,000) and even if the buyers were a two-person household with a joint income of £40,000, they might just obtain a loan if they had a good credit rating. However, they would still have to find 20% of the cost upfront as well the money to cover the increased interest payments. Thus, in order to service this average house price a buyer or buyers would need income of £70k to £80k a year. Affordable housing thus simply cannot and will never be affordable for a significant proportion of the population whom we are trying to help.



The traditional answer to this problem was to turn to local authority provided social housing. Indeed, this was an approach favoured by some past Conservative governments (e.g. the Macmillan government in the 1950s). However, there is another tried and tested approach to delivering social housing, and that is through the expansion of the housing association movement. There are various ways in which this can be done, including models that allow for equity to be acquired during tenancy, thus starting people on the road to home ownership; and a new model for conversion of existing premises proposed by the Affordable Housing Commission under the leadership of Lord Best, who was the architect of the first major expansion of housing associations in the 1970s. The last Conservative Manifesto committed to:

- *Homes built where they are needed not determined by a one size fits all formula*

The White Paper's proposals cannot under any circumstances fulfil this commitment, which is especially important to younger people – under the age of 45 – who are looking to the political system to help them out of their current predicament.

1.3 Sustainability and Climate Change

The Government recognises the importance of sustainability and of acting effectively to combat climate change. For this to be meaningful in the planning context it is necessary to have clear criteria for evaluating the sustainability of planning proposals, both general (i.e. Local or Regional Plans) and specific (i.e. individual applications). However, in setting out a new planning framework it is necessary to go beyond that and to set out a number of high level “red lines” which, if crossed, should prevent plans and proposals from being taken any further at all. These are legitimately open for discussion but should include accessibility to sustainable transport, conformity with standards for zero emission housing and with other pollutant limits; landscaping prior to construction and avoidance of sites such as flood plains.

1.4 Land Value Capture and Infrastructure contributions

The Government is right to recognise the part that land values play in influencing the current planning system. However, the proposals for reform of this fall far short of being effective. The key issue on this is the point at which land value is affected and to address this the White Paper should have picked up the far more cogent analyses in the recent Select Committee report and in the report by Sir Oliver Letwin. Similarly, the White Paper's vague proposals on how to replace S106 contributions made by developers to help fund new infrastructure not only fail to provide any level of certainty but again fail to meet some very specific Conservative Manifesto commitments:

- *Removal of developers' ability to avoid obligation through viability*
- *Develop contributions to build all infrastructure needed at an early stage of development*

1.5 Zoning

This is where the Government's “algorithmic” and centrally controlled approach completely parts company with reality. It is not entirely clear whether the Government envisages every English local authority allocating every square mile of its land to one of the three proposed zones, but if it does, that is a Herculean task that will be beset with difficulties at every turn. If that is not the intention, then in addition to the proposed three categories of zone there will be large tracts of land over which it will be unclear exactly what planning regime applies. England is far too varied for a



simplistic three zone structure to be applied across the whole country. Even within the “protected zones” the level of protection in practice looks to be no better than at present and open to the same pressures and abuse. There is a real danger that the proposed “Growth Zones” would over time evolve into whole new towns, but without the sort of careful planning that created successful new towns in the past. A more realistic approach would be to build on the positive experience of “Enterprise Zones” and allow local authorities, in the context of regional and local plans, to consult on and then determine their own Enterprise Zones within which simplified and faster planning procedures might then apply.

1.6 Design Standards and Beauty

A sharper distinction needs to be drawn between design standards and beauty. Setting minimum design standards of a technical nature – for room sizes, insulation, energy efficiency, carbon output and green space provision is a proper role for central government. Leaving aside the importance of updating standards to reflect new understanding of the scale of the climate emergency, what really matters is that the standards are applied, and rigorously enforced, for all developers and types of development. That is not the case at present. However, other standards relating to design and “Beauty” are surely matters for local people. “Beauty” is “in the eye of the beholder”. It is a subjective perception and certainly not capable of being regulated or prescribed nationally. It has to be addressed in the context of local landscape, style, tradition and preferences. It is beyond any doubt something that needs to be judged at local level and in respect of each and every planning application.

1.7 Local Democracy and Building Communities

Local democracy and sustainable development are interconnected. The UK's overall economic growth is largely dependent on local socio-economic development. To be truly effective it is important for residents to have power in the decision making through all stages of the planning process from inception to completion. This better balances the inevitable limitations and shortcomings of central government. Many commentators have deplored the way in which the White Paper undermines local democracy and we strongly endorse that view. Above all, “planning” should be about building sustainable communities. It should also be about wider “land use” and not just about getting houses built. Local authorities are far better placed to approach planning in this way than is central government. Indeed an “algorithmic” and rigid structure is exactly the opposite of what is needed to build sustainable communities. Developers can also really only be held to account for their commitments at local level. Again, it is impossible to see how the White Paper is even remotely consistent with Conservative Manifesto commitments:

- *Development to be led by plans set by local authorities with their residents*
- *Developers forced to build the houses they have planning permission for*
- *Removal of developers' ability to avoid obligation through viability*
- *Locally set percentage of affordable homes*

1.8 The Government has often made clear its support for Neighbourhood Plans but again, the White Paper goes in the opposite direction, not only through its imposition of a centralised structure, including design and “beauty” standards but also because the transition to the new system, including the time it will take for local authorities to draw up new local plans and determine the zones will effectively halt the process of Neighbourhood planning for several years as Parish and Town Councils wait to see what the new broader planning structure is



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before embarking on what, for them, is a relatively costly and very time-consuming process. A more effective approach would be to find ways (by working with the Association of Local Councils) to simplify and speed up the Neighbourhood planning process and to make sure that local planning officers give proper weight to Neighbourhood Plan policies once a plan is adopted, which all too often at present they do not.

2 Achieving the objectives: keeping promises

We agree that the declared objectives of the White Paper have much to commend them. The problem is that the actual proposals will in many cases make achieving those objectives impossible.

- (a) The proposed methodology will put homes where there is already development and where the market is most attractive for developers, not where the homes are needed (as the Conservative Manifesto promised). Local authorities with properly constructed local plans will have to cater for huge increases in housing numbers, often in sensitive areas, whereas those who have had no plans and have had little development in the main have been allocated little new additional housing.
- (b) The theory that more housing results in more affordable prices has long been disproved.
 - In fact, developers slow the completion rates down until the market has caught up again
 - The effect of the proposals will be to concentrate new development in the south, thus completely missing the target of “levelling up” in the north of England. The Prime Minister’s specific promise to include rural areas in the “levelling up” process is largely ignored.
 - The vast increase in housing in South and South-West will result in large areas of land at present producing food being lost.
- (c) The Prime Minister has said that we need to get away from the idea *that ‘Whitehall knows best’ and that all growth must inevitably start in London. Because we as Conservatives believe you can and must trust people and communities to make the decisions that are right for them.* Yet the proposals in practice do exactly the opposite. The Government wants to speed up the delivery of new homes but by seeking to introduce a wholly new planning system, delivery will in practice be delayed. Far better to insist (as the Manifesto said) on developers actually building the million homes in England for which planning permission has already been given. The Prime Minister has said, the Government will “support the creation of new kinds of homes that have low energy bills and which support our environmental targets”. That is an admirable goal but it will not be achieved by the proposals in this White Paper.

CPRE Avon and Bristol
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