

Green Ixworth

Suffolk

Response to the White Paper:

Planning for the future.

We find the White Paper challenges many concepts of public engagement and protection of the environment. Although ostensibly promoting involvement it creates several new obstacles to practical participation by the public. The language used throughout refers to new concepts and priorities out with the interests of the ordinary people who live in or near new developments. A glossary would have been helpful to understand PropTech, Higher Risk planning authorities, etc.

Many of the sections pose questions which are impossible to answer with any accuracy as substantial parts of the proposals are yet to be published and considered.

Why Planning.

There are a number of sometimes contradictory factors which need to be resolved in the planning process. Put simply they are the provision of Infrastructure, Housing and Commercial Properties to satisfy perceived needs with the interests of those already living in the area and their environment and the interests of future residents.

Whilst ultimately government must decide on the national housing need its distribution should factor in the differing features of local environments and locally funded infrastructure.

We believe that environmental considerations should be the overriding feature of all local, regional and national plans including those covered by Nationally Significant Infrastructure Projects and Development Corporations. Policies should focus on protecting and enhancing the environment both natural and built.

The Climate Emergency, over consumption of natural resources, exposure to harmful pollutants, insecure food supplies, unhealthy personal environments, threats to the natural environment and poor energy efficiency are all aspects of our future which the planning process should address. The UK has a reputation as the “dirty man of Europe” and provides some of the worst housing in Europe with the smallest habitable areas.

Many of the current environmental challenges result in one of the major causes of ill health, Mental as well as physical. Stress has a number of causes directly related to the built environment, including limited space by area and number of rooms leading to lack of privacy inside and out and disturbance. Noise from neighbours and road traffic, pollutants, vehicle exhausts and tyre wear, also result in both stress and physical damage to the human and animal body. All can be reduced or even eliminated by good planning and reducing housing and population density. Your proposals to increase housing densities would directly run counter to this.

It is not clear in the WP how the proposals would ensure developers would engage with local authorities to minimise requirements for private transport for work, school, shopping, etc. Nor the requirement to only *make provision* for the future installation of energy efficiency measures. We are talking of new properties which hopefully will have a life of many decades if not centuries, the real costs to purchasers of updating energy supplies will be much greater than by installing them when new. If they are going to be compelled to install devices at a later but soon date, why not now. Existing properties will be a drag on energy efficiency for the whole housing stock regardless of efforts to encourage improving efficiency.

How to agree what is needed

Planning Policy impacts us all, thus we should all be involved. That does not happen sufficiently now, but the emphasis in your proposals is likely to further reduce the active involvement of the people concerned. Our experience creating a Neighbourhood Plan with regular consultation has involved many more people than would normally have participated in the wider planning process. The suggestion that in future all consultation could be conducted by smart phone misunderstands the need to understand, consider and talk to others about what is proposed. The complexity of the rationale for applications and decisions on major changes to the local built environment requires considered decisions, not an instant “like” on a phone. Present arrangements ensure that both online and in the press, and at public events, active discussion takes place with additional information and views which people may then take into account. Further, developers frequently hide or minimise elements of their proposals, we see nothing in the White Paper (WP) which is likely to improve honesty in the planning process indeed the opposite may be the case with changes coming after permission is granted.

The proposed 30 months period for plans to be drawn up by Planning Authority (PA) and to grant outline permission would appear to exclude the present arrangements for Neighbourhood Plans (NP) with the PA being responsible for bringing forward development sites. Under proposal 9 the WP seeks to retain NPs. Given proposal 8 2.48 Stage 1, allowing 6 months for the initial stage of bringing forward possible development sites and public involvement, where is the opportunity for genuine public consultation which may have to be repeated if further changes need to be made following that consultation. We welcome that, where appropriate, plans could be developed street by street but they would have to be incorporated into the NP in order to ensure they were consistent with each other and the whole Neighbourhood Plan, taking yet more time.

The development of plans at local level and then incorporating them into those of planning authorities in 30 months is, to say the least, optimistic and can only be achieved by cutting out most of the consultation. Developing local heads of agreement on style, housing needs of the community and impact on environment cannot be done by smart phone. Neither can the process of calling for possible development sites and then investigating the implications on existing schools, health care, transport, retail, recreation needs and the nature of the location be rushed, even though much can be done on public websites as well as by personal contact. Public housing surveys to assess local needs also take time to conduct.

The idea that Officials should authorise detailed consent rather than submit advice to elected representatives drives a coach and horses through the expressed desire to involve people more widely.

Our experience of delays in the planning process is largely caused by developers ignoring existing policies and development plans of the planning authority, of which they are well aware. They seek to push the boundaries, relying on PA to bend under the pressure or appeal to the Government. We see nothing in the proposals to ensure they could not do the same under new arrangements. There are already over 1 million permissions for property held in Developer land banks. Web based systems for publication of updates already exist but gaps between responses from the developers and the request for more information from the PA is where the delays occur. Digitally matching plans and policies with developers demands is always going to need some flexibilities, for it not to would reduce planning to a rigid fit regardless of circumstance or time. Often developers will seek consent with some offered benefits for the planners to determine, or other offers e.g. public footpaths, off the site, this flexibility will be lost. The mix of properties would have to be defined anticipating what other developers in other local sites would do and when.

When drawing up a local/PA plan there will be sites of differing size and environments with differing demands on infrastructure. It will not be possible to pre-program the order in which sites are developed or the time scale. Current evidence shows that land hoarding prevents PAs knowing when local housing demand or infrastructure needs can be met, the proposals reinforce this uncertainty.

The suggestion that in the event of an application being rejected and then successfully going to appeal the developer could demand return of fees from the PA is outrageous. The granting of consent is a public good and any costs should be met by the applicant, whilst making the process one to minimise costs on both sides, there should be no presumption of a right to develop come what may.

The current government proposals to abolish District councils would remove even further the decisions on planning from the people.

To answer the questions posed:

Q1 The questions are often disingenuous and simplistic. E.g. Q1. Our best answer would be **“favours deep pockets”** because they can afford to appeal and challenge the PA unlike small developers and individuals.

Q2 **YES** Our view is that the present system is understandable, and enables local people to be involved. The problems come when developers challenge the wishes of those directly affected. Most communities fully understand the need for more housing and that new housing should reflect the needs of local residents as much as those wishing to move into the area.

Q3 You make the claim that “our proposals will make it much easier to access plans and contribute.” Using digital mapping and comparison is likely to make the process more opaque than at present with reasons for decisions no longer clear and transparent, lost in the algorithm.

Q4 Local residents require housing which is affordable to them, not the government's definition of “affordable housing”, especially in lower house price areas. Housing which is suitable for those with disability and elderly, for singles and young couples to rent or to buy. Further, cheaper and social housing, especially for local needs, should be brought in to all developments to avoid the development of ghettos. Such homes need decent sized rooms and internal and external storage and space. The developer's priority is “Executive

Homes” which are more profitable. Further densification of housing leads to the absence or diminution of public green spaces, footpaths and landscaping. There is potentially a conflict between less dense housing and the environment but there are sufficient examples of good design and proportion to benefit both the environment and more housing.

Infrastructure, heritage, High Street, environment and local economy are all crucial areas as they impact on the long term not just the short term.

Q5 **NO** The difficulty of being able to define the only way an area of **growth** may be developed and then granting automatic permission would prohibit innovative ideas and options from developers being shared with the PA and local people. Many sites will have features which even over the period of a local plan could change significantly, thus tying future development to the past rather than the future, particularly concerning as climate change mitigation and prevention will be throwing up new and unforeseen changes and challenges.

Renewal areas present a real problem as any individual development could have huge implications for the immediate neighbours as well as the whole neighbourhood. It would also limit control of for example skylines of the new developments.

Protected areas are to be welcomed provided they are able to be defined by localities and not be limited by policy set out by the NPPF or elsewhere. Areas of **any** flood risk should be protected and permission only ever granted where mitigation could do no damage to the local environment or to natural flows and washes. Climate change has already shown even areas of low flood risk can rapidly change into something worse. The 100 years risk could drop to 5 or 10 years during the life of the first planning period from 2028. See Proposal 24.

In general therefore, as proposed, we would be **against**, however with the changes above we should be happier.

Q6 **NO** National development policies as a guide are fine but to apply rigidly to so many different local circumstances would unnecessarily standardise and limit flexibility at local level. A uniform Britain would result in spite of proposals elsewhere to respect locality.

Q7a **NO** Sustainable development will differ from area to area and reflect the options available for development sites. Local plans often reflect the long term hopes and desires of local authorities leading them to bring forward sites in an order to enable infrastructure to be provided sensibly so “reserve sites” to suite developers immediate wishes puts them at odds with the PA plan and those local people who have agreed it. Further in 2.20 you refer to “reasonable prospect” of infrastructure coming forward within the plan period. This is clearly not something always within the control of the LA.

Q7b You give no reason for removing the “Duty to Cooperate” test and then ask how it would be replaced. Unless there is some overriding reason for change then leave it as it is.

Q8a **Not Sure**. Covid has illustrated a trend towards many working people moving away from large urban areas. The head of the Civil Service has indicated that fewer Civil Servants will work in London and many may work from home for some if not all their working hours. The object seems to be to provide a better life style with less commuting and more affordable housing of a higher quality, size and environment. This is likely to increase demand in rural and semi rural areas, small towns etc. The distribution of housing

needs is therefore likely to change. If the decision of employers and employees is to avoid regular commuting and decentralising, the requirement for significant additional housing in areas of high prices may well be reduced.

Q8b **No.** Measures should be taken to ensure that employment is better balanced around the country. With changes due to climate change mitigation, the results of Covid 19, new technologies, growth of centres of regional development and better transport links the movement of employment to the regions may well be easier now than in the past. Restraints on housing development in congested areas will work to discourage house purchase. At the same time social housing and housing which is affordable will protect key workers. Until we have a more rational system of locating employment and allocating housing development land the market system will continue and demand in some areas would make prices unaffordable for all but the very wealthy and then where would essential service workers live.

Q9a **No.** Whilst a degree of public control may be exercised over the definition of each growth area, the detailed plans of the developer will need to be seen prior to granting outline permission. This is the only way that large developments can be managed, i.e. the relationship between different blocks, especially if your proposals to encourage multiple builders on these large sites multiple developers, are implemented. Otherwise we effectively retain the present system where developers push the boundaries of what is acceptable to the PA, and delay ensues.

Q9b **No.** Certainty is destroyed by this process, why plan if the plan can be over ridden for purely commercial interest?

Q9b **No.** Throughout the document options are provide for the developer but not the PA. You propose to permit developers to put in an application which is different to the plan because of changes but do not seem to offer the same rights to the PA to reject plans which fit the plan but fail to take account of changes in circumstance.

There would seem to be a contradiction between paras 2.35 and 2.36. 2.35 indicates that in protected areas applications may still be submitted. 2.35 assumes the principle of permission has been granted, so that local interest may only be about the details. This changes the present situation of limited local participation to one of **no effective participation**.

Q9c **No.** Such proposals ride rough shod over the expressed view earlier in the WP of seeking to extend the involvement of local people. This proposal would not even give the PA any involvement. All these are the people who have to live with the consequences.

Q10 **No.** It is more important to make the right decisions than quick decisions. The granting of Planning Applications is a Public Good and should only be granted when the public both directly and through their elected representatives have given their consent.

Applications for new or extensive redevelopment of individual properties only, could benefit from a reasonable time limit after which the application is deemed to be granted. For large developments with issues this could push the PA into rejection in order to protect its plan.

Applications which are appealed against the wishes of the community and succeed should not have a further penalty applied to the community. When an appeal fails the appellant should pay the costs of the PA representing the community. Applicants do not have a right

to develop, they are asking for public agreement which is a public good. There should be no costs to the public purse for saying no.

Q11 No. There is a need for digital accessibility but it should have flexibility to reflect the real world. A new template may well not reflect the issues which PAs or electors are interested in. It would not be the first time that Architects or Planners failed to understand what people want. Engagement with the community has to be handled sensitively and the idea of being able to look at a smartphone screen to examine a detailed map of a large development and make any meaningful contribution is nonsense. The example given of a Prop-tech SME, whatever function that carries out, reporting 70% of users are under 45 is meaningless. If we look at potential user population of approx 64 years spread, those using the app i.e. 20 – 45 years, represent only 31% of the potential users whilst those not using the app represent approx 69%. Further after many years of broken promises we are still far away from universal fibre and high broadband speeds. The sort of detailed documents which applicants will need to provide may be impossible on the slow speeds many have available. This therefore may be fine for younger people and those with fast broadband but not for those of middle age and older or slow connection if any. It is discriminatory and would likely founder when subjected to the normal tests of discrimination required of all legislation. The assumption that Prop-tech companies will be interested in providing services for ordinary people rather than the developers who pay their bills is unconvincing. It further means that the cost of submitting individual requests for Planning Permission would have to go through a third party adding further costs.

Q12/13a. Q12 and Q13 Are the wrong way round. If there are to be Neighbourhood Plans incorporated into the PA Plan that must come first.

Q12 No. See below

Q13a Yes

An important proviso we would wish to place on all the proposals is that the Plan at County, District and Parish/Town/Community levels once made should, other than in exceptional circumstances, be fixed for the full term of 5/10/20 years. Exceptional circumstances only should warrant any change in allocation of land to the three categories. Those circumstances should be to protect land the development of which could cause permanent loss of habitat including new wildlife migration due to warming, significant archaeological finds or health and safety issues. Unfortunately present experience indicates existing local plans developed after extensive consultations can be changed arbitrarily by Planning Authorities without further consultation.

Neighbourhood Plans.

NPs, providing they are respected by PAs, can provide a secure way of achieving buy in to development on a local scale, often the scale at which people protest over imposed development. The process of consultation with full explanation of the proposals by those on the working groups who are local and known to locals, results in modifying plans from consultation which are vital if time consuming. The longest and least flexible part of the current process is the final stage of statutory consultation and inspection determined by central government. You will be aware that Neighbourhood Plan Working Groups are staffed by volunteers with an interest in their community, they are not IT specialists neither do they have an indefinite amount of time to devote to the process of collective and individual work on the plan.

Even Local Government is usually only aware of registered social housing needs and the registered needs of self builders. It does not know what the housing needs of a community are. This is something only revealed in Housing Needs Surveys conducted by the Neighbourhood Plan Working Groups.

Whilst planners are undoubtedly experienced and skilled there is sufficient evidence to show that local historic information whether personal or photographic, e.g. flood risk, may be more relevant than recent information, whether or not in digitised form.

The present system of Inspection of NPs ensures that they include sufficient sites for the target growth. Most NPs, mostly in conservative areas, are far from being NIMBYs, identifying extra land for potential growth thus permitting future infrastructure needs to be met at lower cost and disturbance. Our Parish Council is preparing a Neighbourhood Plan which is shortly intended to go to Regulation 14 Stage. It is being positive about growth, proposing potentially to allocate a significant amount of new housing growth. The current Local Plan adopted in 2015 already allocates sites. In one case the developer took the allocation forward slowly in the first instance and then wanted more properties than allocated and a different mix, plus less green space and sheltering from road noise than the Local Plan required. After 13 years, the developer withdrew their application. In the meantime another developer was told by Suffolk County Council, as education authority, that they would object to the development solely on the grounds of inadequate space in the local school because they had to allow for the 13 year old “non development” to be occupied. Timed phasing of developments is crucial to provision of infrastructure which should be provided on the basis of the plan as a whole.

When developing the NP it is possible to include a wish list of facilities, sometimes of little or no cost to developers, on land which they own but is not allocated to development. Under the proposals it is difficult to see how this could be included. Planners may often be unaware of informal routes and access which are of growing importance to most communities. Problems arising from poor planning decisions in the past are more keenly felt in the community than planner's offices.

If consultation is to take place it needs debate, discussion and a consensus to be drawn. This is easier to obtain at the beginning of a process rather than when presented with what appears to be a fait accompli. Any minor change at that stage can have huge implications for other major parts of the plan and, if consultation is to be respected and valued, it would then require a further level of consultation.

There is no doubt the present three years or so typical for a NP, could be shortened somewhat especially if the period for inspection were reduced. If all Town, Community and Parishes were to carry out the process simultaneously with the planners looking in from time to time to measure both progress and potential problems the time for subsequent stages could be reduced. In the event that local communities do not wish to draw up their own plan and are happy for the planners to conduct that first stage then that would be fine providing the full consultative process is followed.

In stage two the WP refers to “Higher-risk” authorities who is to define these and why?

In stage three, lasting 6 weeks, the PA publicises the plan and receives comments and proposals. It then has to incorporate them into the document it has already sent to the SoS. If the consultation or the response is to be genuine then the time is unrealistic and

should precede the submission to the Secretary of State.

Q13b There is little doubt that good consultation requires presentation of the object of consultation in user friendly form and someone to help take them through the process. Exhibitions and public presentations with open debate have proved to be more effective than seeking an online response which is usually done in isolation and without discussion. The final results of the NP can readily be converted into digital format

Q14 **No.** There is a current labour shortage which has grown following the decision to leave the EU, as highlighted by the Migration Advisory Committee. There is little evidence that the skilled workforce will grow rapidly in spite of recent government announcements on training. Availability of skilled labour is already the major restraint on construction, not land nor permissions. If developers were to employ most of their own workforce directly and train their own apprentices they would be more capable of delivering quality homes more quickly.

Delivering a large quantity of new homes in one location at one time may not reflect the demand, at that time and in that location.

Q15/16 Individual properties especially, but not exclusively, at the cheaper end, fail to reflect the minimum needs of the occupants. Rooms are too small, sound and heat insulation inadequate. All properties have energy inputs too high and energy consumption is inefficient and failing to reflect long term sustainability. If architects were not so constrained by designing down to price they already have the skills and knowledge to produce better buildings at an affordable price. Beauty is in the eye of the beholder so “beautiful” houses in an enclosed environment which is noisy may well be felt to be less beautiful than an ordinary house in a well spaced environment with plenty of native greenery and the wild life it attracts. Wildlife corridors between and within developments connect other areas where nature and its multiple benefits can be brought close to people.

The local physical environment is of great importance. A good view from the window assists people to cope with the daily trials of life, a poor view can make things worse. The experience of Covid has shown how important is the Natural Environment.

Transport in rural areas is difficult at the best of times due to low density of population. New developments should make provision for easy use of public transport and reach arrangements with local authorities and transport companies to arrange new routes or modify existing ones in advance of completion. The absence of current or future public transport should be a constraint on development. Public transport to be effective has to recognise economic and travel to work areas, routes and timing to enable workers to access sources of employment and children access to school without the involvement of parents and their cars, along with transport interchanges. Some this can be mitigated during the plan development

Q17 **Not sure.** This could be welcome but will depend on the starting point of the National Design Guide, National Model Design Code and the revised Manual for Streets. Our fear is that these codes and guidance will severely limit the flexibility of those drawing up local plans. If these provide sufficient flexibility then the answer would be **YES**

Q18 With the proviso above and sufficient funding for the Planning Authority the answer would be **YES**.

Q19 With the proviso above **YES**

Q20 **Yes** These proposals mirror the French tradition of giving detailed permission to a design. It tends to produce estates of virtually identical housing in style albeit with differences in size. Orientation is always to the south, for the sun and now for efficient solar panels. They do not look beautiful. With the provisos in para 3.20 this proposal could be acceptable.

Effective Stewardship We welcome these proposals and look forward to its effective implementation. Flood risk areas should generally not be developed. Apart from the higher costs of construction, mitigation and anxiety for householders, they provide excellent habitats for wildlife and open space for nearby residents and river related recreation.

Proposal 16 Due to climate change, surveys need to be more frequent than in the past as the natural environment is changing rapidly as plants, invertebrates and vertebrates move from their traditional areas to more suitable habitats. In order to speed up the process resources will be need to be provided for local wildlife trusts to monitor changes.

Proposal 17 The drawing of larger areas than previously for development and quicker acceptance of plans will reduce the time available for new classifications of buildings and heritage. Additional resources, simpler procedures or more time is needed to protect them from the new development.

Proposal 18 Sustainability is about more than energy. Mental health has suffered under Covid but was worsening before. Space in homes and outside both private and public, privacy and the benefits of the natural environment are known environments and treatment for many health conditions including stress. This will become even more important as home working increases. Until the gas grid uses 100% hydrogen, heat pumps with underfloor heating should be installed as soon as is possible in new properties with collective systems where possible We know the problems, we know the solutions, the equipment is already being installed by many developers why not all? Developers were after all ready to go in 2016. 2025 is unnecessarily late

Construction should be using more carbon neutral materials. Timber for construction can be entirely sustainable whilst traditional concrete and bricks are inevitably high producers of CO2. Plastics often have lower full life footprint of CO2 and other pollutants than say painted wood. Low carbon materials should be promoted for use not just permitted.

Q21 New development should bring with it all that the community requires to provide for the new population. Thus all of the "priorities" listed should be addressed. The community should not be diminished in any way as a result of development.

In para 4.9 a number of options are raised. One feature is the reliance on a "threshold" for paying a contribution to the public costs of a development. The taxpayer then has to pay for the public costs of a development. On the polluter pays principle, the developer should bear the public costs.

In para 4.13 you propose to permit LAs to borrow against the Levy so that infrastructure can be provided in time for completion of the development. Why should the LA pay the costs of borrowing when it is to the developers advantage?

Q22a **No** However collected, the proposed funds would go into a pot and priorities

would have to be determined. This would usually mean the top priority receives the lions share. As demand for affordable housing for buy to rent or buy is so high and supply so low this would normally be the top priority. Thus issues of infrastructure capable of dealing with the increased demands of the development would inevitably come lower on the scale. If affordable housing were to be removed from the levy the subsequent distribution could be easier. The conclusion therefore should be that, however raised, ring-fencing should distribute the funds to address the direct costs of the development to the public purse. At present that is semi-automatic for much of the contribution. After all this is the arrangement that exists for the provision of utilities by the private sector, why should the taxpayer be subsidising wealthy development companies.

Q22b Locally This option retains within the community control of the distribution of monies which may be in accord with a proportionate ring fence. It should also enable a set distribution to Town/Community and Parish Councils.

Q22c More value See above

Q22d No The levy should be paid up front so that infrastructure can be ready on completion.

There is a general concern with this whole process. i.e. any sum guaranteed or expected from the Levy could reduce the block grant to LAs. Governments have previous form on this.

Q23 Yes We support this proposal as argued above.

Q24 Developments should be as broadly based as possible with a wide variety of housing so, other than small developments of three or four houses, there should be a social mix. Thus developments over 3 or 4 should provide for affordable housing integrated on site.

The concomitant of this is affordable housing should not be a part of the Levy, it should be a normal expectation of the development.

Q25 No

Q25a It is not clear to what the ring fence applies. The levy should be funded without expecting it to pay for the Affordable Housing. If this is the case then our answer is **YES** otherwise **NO**.

Delivering Change

Para 5.1-5.6 Most of the changes proposed are lifted from the overall proposals and seek to implement the White Paper in advance of consultation and legislation. The damage done to local communities and high streets in the intervening period would be significant.

There is no justification for lifting the small sites threshold on contributions for affordable housing. The need for affordable housing is desperate and need not make smaller sites unviable.

Para 5.7 "Working From Home" may well reduce the need for physical regional as well as national hubs.

The major limitation on provision of social housing is land cost and availability. Therefore Public land should be offered first to providers of social housing and community land trusts, then self builders and SMEs

Proposal 24 5.3 Flood Plains should be areas generally prohibited for residential and commercial buildings not related to the maintenance of water courses, the natural environment and recreation. The potential damage by flooding to private and commercial properties, damages the local economy as a whole as well as damage to the health of those who suffer. The subsequent rescue and restitution of private and public facilities is a cost to the public purse not the developer.

Q26 There are a number a impacts on protected characteristics. Those with physical disability and visual issues, require housing which suits their disability, this should include social, private rented, affordable and others. In particular single story buildings are a priority. Housing for those who require regular or irregular residential help should also be recognised. Building standards should recognise those features which are appropriate for these disabilities. Longer life requires more of us to live with health issues. There is no reason why wider doors should not be built into all houses, it is not just those with a permanent need for wheel chair access, many of us will require such temporary assistance whilst we are otherwise capable. Modifying properties is expensive, building in some of the features for all is a cheaper option. These measures would increase flexibility in the housing market.

Previous reference has been made to dealing with mental health issues where a green and calming external environment is essential for a better life, as it is for all of us. Many of the comments we have made would create a better environment for all. And that after all is one of the great benefits of planning our built and natural environment.

Those with limited access to high speed broadband for technical, health or capability grounds would be excluded from the proposed process. This could be a high proportion of electors in some areas.

In summary the proposals would result in: less access to involvement, decisions made for obscure reasons and create a near National Planning Process. Hardly "Localism"!

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