



The countryside charity Bedfordshire

CPRE Bedfordshire Planning Reforms Briefing

September 2020

Executive Summary

The government announced two consultations in August this year which together, would result in the biggest changes to our planning system since the Town and Country Planning Act was introduced in 1971.

The Planning for the Future White Paper consultation runs until 29th October. Its proposals mean a major upheaval of the planning system. The proposals have prompted widespread opposition across a wide range of interested parties, including local planning authorities of all political hues.

The major concerns include; the fear of a loss of local democracy with local authorities left powerless to prevent developers cherry-picking green field sites whilst leaving brownfield land unused and the likelihood that the proposed reforms would have negative impacts on the delivery of affordable housing and access to green space.

The proposals to introduce a zonal planning system would weaken protection of green space designated for growth or renewal, and offer no additional safeguards for those earmarked for protection.

‘Protected’ areas will be those with site designations such as Green Belt, Areas of Outstanding Natural Beauty (AONBs) and Conservation Areas, giving no consideration to the importance of undesignated green spaces near to where people live.

The Changes to the current planning system consultation runs until 1st October 2020. The proposed changes are focused on the introduction of a new Standard Method for calculating local housing need for each local authority area, which brazenly abandons an evidence-based approach.

Crispin Truman, chief executive of CPRE, comments that ‘governing by algorithm simply doesn’t work. We are in the midst of a housing crisis, and we need many more well designed, genuinely affordable homes, including in rural areas. But combining this algorithm

with far reaching, untested reforms to local planning, could result in irreparable harm to our countryside, without delivering the housing we actually need.'

Whilst the Government professes to want house-building to support the leveling up of the UK economy, the new methodology pushes the highest rates of growth to where existing demand is highest.

In addition, the Government appears to believe that reducing the delivery of affordable housing is a fair price to pay in the short term for boosting the number of homes built by SME developers.

Part 1: Planning White Paper

The government published its Planning for the Future White Paper and Changes to the current planning system consultation on 6 August 2020. Its proposals mean a major upheaval of the planning system. CPRE has a long history of engaging with planning policy since the organisation was founded in 1926, and our vision is for the countryside and green spaces to be accessible to all, rich in nature and to play a crucial role in responding to the climate emergency. A healthy and democratic planning system is crucial to delivering that vision, but these damaging changes threaten our ability to shape the future of where we live.

Widespread opposition

- Over 260,000 people have signed petitions by CPRE, SumOfUs and 38 Degrees in opposition to the government's plans.
- In a poll commissioned by the Built Environment Communications Group (BECG) in September, only 4% of elected councillors stated that they believed the government's proposals would make the planning system more democratic.
- CPRE has convened a coalition of 40+ housing, planning and environmental organisations in opposition to the White Paper.
- A survey of local CPRE groups found that:
 - 83% believe that community voice would be significantly diminished if the proposals are implemented as currently set out.
 - 91% want the government to rewrite either major sections of, or the whole of the White Paper.

Key concerns

CPRE has the following major concerns with the White Paper:

- Loss of local democracy
- Housing affordability
- Access to green space

Loss of local democracy

A crucial feature of the planning system is accountability and the opportunity for communities to feed into plans in their area. The Secretary of State has stressed that local democracy will not be lost in the new system.

However, restricting community engagement to the Local Plan making stage will result in members of the public losing their ability to scrutinise individual planning applications.

This is effectively cutting local democracy in half.

In contrast, developers will only need to successfully influence a local plan and will then have sweeping powers to build however and whenever they like on most sites.

The White Paper proposes a national approach to setting binding housing requirements (there is already a national approach to housing needs forecasts, but it is not binding on local authorities and can be varied according to local circumstances).

This approach, as well as the proposed new forecasting method, is too centralised and does not sufficiently take into account the needs or environmental constraints of local areas. It is also likely to make it more difficult for local authorities to acquire land to build affordable homes, as large developers and land agents will bid prices up for land that is more likely to be developed under the new system.

Much more priority needs to be given to helping local authorities regenerate brownfield sites and build more affordable homes to meet local needs.

Housing affordability in rural areas

Furthermore, developers on small-to-medium sites are currently required to build affordable homes if the site includes more than 10 units.

The White Paper is lifting this cap to 40-50 units. With this proposal expected to remain for a minimum of 18 months, this will leave many areas without the affordable housing needed for some time to come.

The impact of this will be felt most acutely in the countryside and in particular small rural towns, where sites tend to be mostly in this small-to-medium bracket.

This means fewer homes that people of lower incomes, including many key workers, can afford. This proposed short term change (in the Changes to the Planning System consultation) sits in direct contradiction to the longer-term reforms proposed in the *Planning for the Future* White Paper, which repeatedly calls for maintaining and improving the levels of affordable housing.

Access to Green Spaces

A vital purpose of the planning system is to contribute to protecting and enhancing our natural, built and historic environment.

However, the government's proposals to introduce a zonal planning system would weaken protection of green space designated for growth or renewal, and offer no additional safeguards for those earmarked for protection.

'Protected' areas as defined by the new proposals will be those with site designations such as Green Belt, Areas of Outstanding Natural Beauty (AONBs) and Conservation Areas, giving no consideration to the importance of undesignated green spaces near to where people live.

It should be noted that Bedford Borough has no areas of Green Belt, no Areas of Outstanding Natural Beauty (AONB's) and few Conservation Areas. All of the countryside in Bedford Borough including the River Great Ouse and its Valley Area is undesignated and would be afforded no protection from development under the government's proposed zonal system.

Under the proposed zonal system, and in combination with centralised, high housing targets, these green spaces will be under increased threat of becoming a free-for-all for development. The result of which will be the loss of the crucial functions that green spaces serve to local communities in terms of health and wellbeing, in addition to its role in mitigating the climate emergency.

The full document can be found at:

<https://www.gov.uk/government/consultations/planning-for-the-future>

The consultation closes at 11:45pm on 29 October 2020

Part 2: Changes to the Planning System Consultation

Introduction

CPRE campaigns on planning because it is crucial to empowering local communities and making sustainable, liveable places. Ensuring everyone has a decent home, that meets their needs and that they can afford, is essential to that, and our response concentrates on assessing how we believe the proposals will help or hinder these objectives.

The consultation itself is symptomatic of Government's apparent reluctance for meaningful input. It asks respondents to comment on a wide range of specific details, but doesn't consult on the policy principles that underpin the proposals, despite these being often the most important points people will wish to address.

CPRE recently co-sponsored research by Heriot Watt University that identifies the need for 145,000 genuinely affordable homes to be built in this country for each of the next ten years. That means that in the region of half of all new homes need to be genuinely affordable in perpetuity. Considering that expanding the private housing market to the scale currently envisaged by the Government is very unlikely to be deliverable, then the real need is for a systematic, fair and transparent approach to meeting these affordable needs through public investment.

The "Standard Method" of calculating Housing Need in a Local Authority Area.

The proposed new standard method brazenly abandons an evidence-based approach to determining housing need. It takes three entirely separate baselines – existing stock levels, household projections and affordability ratios, and generates a pick-and-mix formula from them to produce a national figure of 300,000 or 337,000 homes per year. No consideration is given to whether, or for how long, the headline national figure will retain any credibility in the face of changing circumstances.

By doing this, the proposals set up contradictions which undermine the baseline data itself. In particular, the household projections are said to be a robust predictor of future growth trends, unless they don't add up to 300,000 homes per year, in which case they're dismissed as not robust.

The Government professes to want house-building to support the leveling up of the UK economy, but the methodology pushes the highest rates of growth to where existing demand is highest.

The approach to tackle affordability relies on private sector house-builders to build so many additional homes that the price of their products falls, even though this is self-evidently incompatible with their business model.

The affordability adjustment directs house-building where existing housing is least affordable, but prioritises home ownership as the preferred tenure.

By pressing ahead with the First Homes scheme despite warnings from affordable housing experts that it will make matters worse overall for people in need of homes they can afford, the proposals demonstrate that they are driven by ideology, not evidence.

The proposals significantly undermine the long-established use of exception sites to provide for small affordable housing developments, by requiring these to prioritise First Homes rather than genuinely affordable homes. Supposed continuation of existing arrangements for rural areas are not properly explained and do not appear thought through.

The Government appears to believe that reducing the delivery of affordable housing is a fair price to pay in the short term for boosting the number of homes built by SME developers.

We support diversification of the industry, but we cannot agree with that proposition, as it runs directly counter to the need to prioritise affordable tenures.

The full document can be found at:

<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

The consultation closes at: 11:45pm on 1 October 2020

The CPRE Bedfordshire contact for matters arising from this Briefing Paper – Gerry Sansom – gerry.sansom@cprebeds.org.uk

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