

Response to 'Planning for the Future' Proposal

Buckfastleigh Town Council 15/10/20

We agree that there is an urgent need for planning reform both in order to effectively deliver more truly affordable homes to those who are in housing need and to meet (and if possible, exceed) targets to halt and reverse the climate and ecological crisis.

We feel however, that should these proposals be implemented, the main impact would be to make it easier for developers to build more houses. We argue that this will not address the need for truly affordable housing for local people and also that over-building will inevitably lead to a reduction in green space, so further degradation of our natural environment.

Excessive Development Targets

There are approximately 216,000 long-term empty properties in this country. There are 301,000 second homes in the UK. An estimate from the Campaign For Rural England, based on ONS forecasts, suggests that currently we need around 180,000 new homes a year to meet need. Current adopted local plans provide for 187,000 new homes per year. We are aware of no evidence base for the government's new targets that exceed that number.

We therefore suggest that the government target of 300,000 new homes annually is not commensurate with actual need but instead a political decision, perhaps based on some desire to feed the housing market and stimulate the economy. We also believe that the decision to disproportionately target areas where demand is greater (rather than where there is proven local need) will not, as purported, drive prices down but instead result in a feeding frenzy for developers and property speculators alike.

We understand that there are already approximately a million permissions granted since 2009 that have not been developed. Many of these permissions will be stagnant as a result of 'land banking' - a form of speculation on the part of developers, as they wait for prices to rise in order to maximise profit on any development. This process enables them to limit supply and keep demand high and therefore keep house prices high. Increasing the ease of developers to obtain permission will likely lead to an increase in this form of speculation and not to a drop in prices to prospective buyers.

There is therefore no direct correlation between the number of permissions given and the number or affordability of properties built.

The new 'algorithm' for building targets excessively targets rural areas, with our own district, Teignbridge (and our neighbouring district of South Hams) being expected to more than double existing home-building. This is in regard to current targets that are already unrealistic, undesirable cannot be met - meanwhile urban areas (except for London) will generally see reduced targets. This will lead to the destruction of rapidly declining green space and further strain on rural infrastructure such as public transport and health, which has seen ten years of cuts and is already struggling to meet demand safely.

Affordable Homes

The government state their intention that boosting housing supply to exceed demand will bring down housing prices and lead therefore to more affordable housing. As we have explained, we feel this is far too important an issue to be left to random market forces. We believe that the way to ensure enough homes that people can actually afford, is to:

- redefine the affordability criteria and require developers to build many, many more truly affordable homes
- tax and restrict second home ownership and property speculation.
- legislate for and resource more social housing with rents set at genuinely affordable levels

In addition, the proposal to raise the small sites threshold for provision of affordable housing from 10 dwellings to 40 will clearly lead to less affordable dwellings, not more...

Community Engagement in the Planning Process

We agree with the Prime Minister in his assertion that he wants to see a planning process that ‘...gives you a greater say over what gets built in your community...’. We too would like to see improvements to the planning process that would enable greater democratic control over what gets built and engage our communities more and effectively in that discussion. However we don’t agree that the proposed changes are the right way to achieve this.

Customarily, most public engagement occurs at the time of specific development – when an individual building or group of buildings is being put forward for development. This is the natural point at which people engage as they can relate directly and in a concrete manner to the issues involved. These proposals would remove the possibility for the public to engage at that point and would in our opinion therefore alienate populations further from participation in the planning process.

Involvement at the more abstract level of drawing up a local plan for the whole authority, generally a complex, bigger job that only currently engages a few councils and organisations that have the resource to take it on (in addition to developers who no doubt do have that resource and for whom it is in their interest to do so), is a laudable aspiration but merely making more access to the local plan process available on-line (and not guaranteeing that public views will carry weight) and removing consultation on the actual structures to be built will not achieve this. In fact it is likely to do the opposite.

If the government seriously wants to re-enfranchise populations who have been disempowered and whose views have been sidelined for generations, it will take a serious and concerted effort of re-engagement.

Much of this could be achieved at a quasi-local level by parish & town councils and community-based groups but it will require significant resource to be made available to local communities to make this happen.

We believe local, community input should be cultivated, encouraged and acted on at every level of the planning process from national policy framework through local plans to decisions about each building proposed and that these proposed changes will damage that process even further rather than enhance it.

Planning & Democratic Process

Currently communities do have some indirect control over the direction of planning decisions in their neighbourhood as they elect representatives to local councils who are accountable to them for any decisions they make about development (although this does not hold true in National Park authorities, which are not elected).

The proposals seek to remove a large portion of that local control over what gets built and 'automate' it based on national rules.

Centralising de facto decision making in Westminster and removing the power of elected local authorities to decide on individual developments, will render them more toothless and thereby reduce democratic process in our opinion. Surely this is not consistent with the stated aims of the Prime Minister to increase resident's say in what gets built in their own communities?

Planning for any new development is always a complex and sensitive issue, where very local considerations around the human, built and natural environment should be taken into account by those who have the detailed information needed to make good decisions. This cannot be reduced to a set of rules. It should always, in our opinion, be a considered decision, never an automated process.

We believe that the final say about whether *any* development goes ahead in a community should be in the hands of local, democratic authorities responding to a community's need and informed by those living in it.

It is also unreasonable to expect that local authority planning departments, already struggling to function after 10 years of cuts, can function properly and achieve better outcomes without enhanced central funding. To abandon their funding to the vagaries of the housing market (and with income always in arrears) will not enable a properly functioning and resourced authority.

The Environment, Sustainability and Climate emergency

We too would welcome a stronger more effective environmental framework to respond to the climate and ecological emergencies we face. It is concerning therefore that the proposed amendments to the National Planning Policy Framework are only to '*mitigate and adapt to climate change*'. To achieve government targets in greenhouse gas emissions and reverse ecological decline, they need to go much further and *halt* climate change and environmental degradation. It is our view that we should be enshrining in the NPPF ways to *reverse* these catastrophic trends.

It is hard to imagine how a framework will both lead to a simpler and quicker planning process than current regulation and effectively and speedily achieve reversal in climate change and ecological degradation. In fact it will surely be far more extensive and contain more than current frameworks which go nowhere near enough towards reversing these life-threatening trends. Specifically, each local environment will have many unique ecological strengths and deficiencies that will need to be taken into account in order to enhance and improve them. More rigorous national guidelines are urgently needed but there can be no 'one size fits all' quick and easy national environmental response.

As stated, national statutory requirements for environmental sustainability, carbon reduction and building standards are in urgent need of enhancement but we have no confidence that these will go far enough to achieve housing that will meet the necessary targets for carbon reduction and environmental enhancement. We believe that local authorities, many of whom have adopted radical

climate emergency and ecological motions, should have more rights to require additional enhancements to achieve these ends, not less.

Any buildings going up right now will be here long beyond the government target dates for net zero carbon and so should be built to meet that standard, otherwise we are just adding to the problem... The time is long overdue to get those requirements built into the planning process as inviolable requirements.

We note proposed targets to ensure that all future buildings meet a reduction in carbon emissions by 75-80% starting 2025. We would argue that this target should be raised and that it should be implemented as a matter of urgency now not in 4 years time! We would also suggest that if this proposal does not take into account the embodied carbon footprint of the massive proposed increase in development and doesn't legislate for a major reduction in carbon footprint of building materials and construction, it is missing a major part of the equation.

We are concerned by the continual emphasis on aesthetics in the proposals. For instance the word 'beautiful' is mentioned 37 times whilst 'environmental' is only mentioned 34. We of course agree that buildings should be developed with an eye to good design and to high visual standards but we also feel that the number one priority should be the response to the environmental emergency and not how something looks! What if a building choice were to come down to the aesthetic versus the environmental? It should be made clear that environmental concerns are the major and urgent priority in this time of crisis.

We are also dismayed by the government's intention to remove the Duty of Co-operation as surely the far-reaching changes needed to improve our ecosystem require joined-up thinking and planning in co-operation with other neighbouring planning authorities now more than ever?

We conclude that this is a set of proposals that puts business (developers, second-home owners and buy-to-let) before people and the environment and as such is not fit for purpose.