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The government has produced two consultation documents concerning future changes to the planning system. These are '**Changes to the current planning system**' and a White Paper '**Planning for the Future**'. The consultations end on 1st October and 29th October respectively. Despite their titles, both consultations are all about the faster delivery of more housing. Great emphasis is placed on "*beautiful and sustainable places*", with many photographs of beautiful developments, but not a single photo of the soulless housing estates with which, unfortunately, we are all familiar. We have heard before from Housing Ministers about "building beautiful"!

There is no doubt that planning is in dire need of reform, but it must lead to an improvement in the planning process. Anybody who has looked at the Greater Exeter Strategic Plan (GESP), or the consultation into their Local Plan, or a complex planning application knows how incomprehensible the whole process is to the layman. The White Paper acknowledges the need for reform of the planning system:

*It has lost public trust with, for example, a recent poll finding that **only seven per cent trusted their local council to make decisions about large scale development that will be good for their local area** (49 per cent and 36 per cent said they distrusted developers and local authorities respectively). And consultation is dominated by the few willing and able to navigate the process – the voice of those who stand to gain from development is not heard loudly enough, such as young people. The importance of local participation in planning is now the focus of a campaign by the Local Government Association but this involvement must be accessible to all people.*

However, change is needed. Layers of assessment, guidance and policy have broadened the scope of Local Plans, requiring a disproportionate burden of evidence to support them. As a result, Local Plans take increasingly long to produce, on average over seven years; have become lengthier documents of increasing complexity, in some cases stretching to nearly 500 pages; are underpinned by vast swathes of evidence base documents, often totalling at least ten times the length of the plan itself, and none of which are clearly linked, standardised, or produced in accessible formats; and include much unnecessary

repetition of national policy. It is difficult for users of the planning system to find the information they need, and when they do, it is difficult to understand. Few people read the array of evidence base documents which accompany plans and these assessments do not sufficiently aid decision-making. Much of this evidence becomes dated very quickly, and production times often render policies out of date as soon as they are adopted. Furthermore, even when the plan is in place, it cannot be relied on as the definitive statement of how development proposals should be handled."

In common with all such consultation documents, they are written in a typical language only understood by bureaucrats. To the layman they are mostly gobbledegook.

Experience has shown that consultations are a box-ticking exercise, with proposed core policy not changing as a result of consultee's criticism or any evidence presented - only minor tweaks are ever made.

Typically consultations do not ask the questions that the layman is most interested in answering or questioning. The consultations also ask for consultees to provide evidence in support of their responses, but the consultation documents do not provide evidence in support of the policy proposals. A prime example is government policy which is based on their "*ambition*" or "*target*" or "*aspiration*" or "*commitment*" to build 300,000 new homes per year to meet what is called the housing 'need'. The government has never provided any evidence to support this number, because, as we all know, it is a number plucked out of thin air. Our latest report from ORS '**How many homes?**', based on the best evidence available, shows that we need about 230,000 new homes per year for the next ten years, the number needed falling thereafter.

However, the consultations do not allow the 300,000 figure to be questioned. The proposed changes provide a revised standard method (an algorithm) which results in a housing need of 337,000 new homes per year. Use of the algorithm will ensure that too many houses of the wrong type will be built in the wrong places - mainly on farmland. Much needed affordable housing on brownfield sites and in local communities will not be built. You might have thought that the government would have learnt by now that having a housing policy using an algorithm which is not based on evidence and contains many assumptions is a recipe for disaster. Based on the algorithm used in the exam results fiasco, even the prime minister has joked: "*Algorithms are banned*"!

Both consultations state that development must be sustainable, without saying what this means. The National Planning Policy Framework (NPPF) defines sustainable development as "*meeting the needs of the present without compromising the ability of future generations to meet their own needs*", although how anybody can predict what future generations will need remains a mystery. The NPPF also gives three strands to sustainability in terms of economic, social and environmental objectives. Given that England is a small country without enough land to feed the population, it is not stated how reducing the area of farmland by covering it with housing estates can be deemed to be "*sustainable development*".

The White Paper shows that the Government wants to simplify the role of Local Plans by identifying land under three categories:

- *Growth* areas suitable for substantial development;
- *Renewal* areas suitable for some development;
- *Protected* areas where development is restricted.

Thus all land will in future be classified in Local Plans as for growth, renewal or protection. Any proposed development in the first category would get automatic permission, providing it complies with building and design regulations, and there will be a presumption of permission for all developments in the second. Protected areas include National Parks, Areas of Outstanding Natural Beauty (AONBs), Conservation Areas etc. For Devon, with large protected areas, this would mean most of the rest of Devon would be identified as Growth areas, with much more housing than needed being built on farmland and with no way it can be stopped. Once the land is built on, it is lost forever.

Overall, we have concluded that the proposed changes to the planning system are based on a flawed algorithm, aimed at delivering more housing than is needed, of the wrong type, in the wrong locations and on a faster timescale, all in support of "*build, build, build*". Yet again, local democracy will be diminished in favour of undemocratic central planning.

Devon CPRE will be vigorously opposing these proposed changes to the planning system.

