



BY EMAIL to:

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RESPONSE FROM THE BEACONSFIELD SOCIETY TO PLANNING FOR THE FUTURE WHITE PAPER AUGUST 2020

We are the Civic Society for Beaconsfield, Buckinghamshire and this is our response to the White Paper.

We are extremely concerned that these proposals are focussed on speed and housing numbers, making the planning processes LESS democratic, rather than making the planning processes more democratic and enabling the protection of treasured landscapes and Green Belt.

1. What three words do you associate most with the planning system in England?

Over-inflated housing “need”.

This is where it starts and then immediately goes wrong. The local councils are sent chasing after a fake “housing need” hare by a daft Government “standard methodology” algorithm to find land for “housing need” which is inflated currently by over 50% in our local area. The new proposals would remove the cap (which currently exists) from the algorithm meaning that the new algorithm would calculate “housing need” in our area to be 100% more than it really is. This will not address affordability; it will only allow developers to build more, expensive housing to their own timetable as best suits them in the market.

See our response to the government’s planning changes consultation which ran until 1st October 2020.

2(a). Do you get involved with planning decisions in your local area? [Yes / No]

Yes.

3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

[Social media / Online news / Newspaper / By post /

Other – please specify]

To make planning proposals more accessible, planning applications should firstly be made more **visible** to more people. This could be done by using all the methods listed above, plus by local town and parish councils publishing weekly lists on their web-sites (with clickable links direct to the applications) and their notice-boards and at libraries; and by civic societies



(and any member of the public requesting the same) being able to sign up to be sent weekly lists by planning authorities by email (with clickable links direct to the applications) and/or post. Physical site notices of applications should not be discontinued and files should still be made available at local planning offices because many people do not have access to technology.

4. What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

Protection of the Green Belt; environment, biodiversity and action on climate change; better local infrastructure. We choose these 3 (but ALL are important) because of particular local district and unitary council failings on these issues in our local area. More generally, the government policy on affordable housing is completely failing people due to the definition of “affordable housing” including housing (such as shared ownership and affordable rent) which is simply not affordable in expensive areas; and provision of affordable housing lying in the hands of developers who employ viability loopholes to avoid providing it or who provide commuted sums in lieu. Social housing is the only way to solve affordability issues in expensive areas so that truly affordable housing is funded by government.

In our area, one developer (Inland Homes) is supposed to complete a relief road under a s.106 Agreement but is sitting on the land (Wilton Park, Beaconsfield) and hasn’t started this development since acquisition of the site in 2013. They need not build the road until occupation of the 99th home (under the s.106 Agreement). This hands control of completion of infrastructure to developers which is entirely unsatisfactory. HS2 construction lorries will be trundling through our Conservation Area soon, while we wait for the relief road - which the developers aren’t building until it suits their timetable. Secretary of State intervention is needed to modify their planning consent to enable delivery of infrastructure now.

5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

No, your proposals are undemocratic, simplistic and lacking any detail. What will be the criteria for the zoning? How protected would “protected” areas really be? Will Green Belt be truly protected and not, in double-speak, “safeguarded” or “preserved” for development.

Local Plans need to be more than just zoning land for development and “design”. How will Local Plans take into account the impact of proposed development on climate change? The



white paper seems to be mostly about “design” but most developers are not in the business of poor design; after all they do want to sell their buildings. There should be minimum space standards, access to green space, fire safety, sustainability, climate change and air pollution standards. Good design is such a subjective concept and changes over time.

The proposals for “simplification” of Local Plans equate to stripping the public of democratic involvement in the Local Plan process. This involvement should take place from start to finish of the process, not be front-loaded. The proposals would lead to centralisation of the process and negate local involvement.

The proposals also pose great risks for sustainability.

A timescale of 30 months is unrealistic. The notion that this should be repeated every 5 years is an unsustainable and expensive burden on local authorities.

The public examination stage must be preserved at all costs. “Self-assessment” by local planning authorities would be allowing LPAs to mark their own homework and completely deny democracy – this proposal is outrageous.

The proposed new standard methodology for determining housing need by imposing hugely inflated housing need targets is of serious concern and should be abandoned. Building more would not address affordability. Please refer to our consultation response submitted in response to the planning changes consultation which ran until 1st October 2020.

Relaxation of permissions in principle gives too great influence and control to developers.

We have sympathy for our LPA who are about to embark on a new Bucks Plan, a process for which they have ear-marked £3 million - how are they supposed to know what rules to follow?

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

[Yes / No / Not sure. Please provide supporting statement.]

No. The proposal for “specific development standards” would be impossible to prescribe as there is no “one size fits all” across a village, town or development area.

What role will remain for Neighbourhood Plans against a back-drop of centralisation? We support Neighbourhood Plans but if they are reduced to a list of “design guides” relating to the appearance of development only, that would be further erosion of democratic inclusion in the planning system.



The proposal for “machine-readable format” of policies and digital screening of developments could lead to a “computer says yes/no” situation which fills us with horror. Planning should, out of necessity, involve subjectivity, nuance and local opinion and input.

A problem with disallowing policies which duplicate the NPPF would arise if the NPPF was amended where a Local Plan had been prepared predicated on and in reliance on NPPF policies remaining in place.

7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

[Yes / No / Not sure. Please provide supporting statement.]

No –it is imperative that the contents of EU directive assessments such as SA, SEA and HRAs are saved and replicated in order to protect threatened sites such as SACs and threatened species and biodiversity. These environmental protections MUST NOT be watered down.

A government diktat of over-inflated housing need numbers directed by an algorithm would be contrary to and conflict with a proper sustainability assessment.

What would be the point of including sites which are not “deliverable”? That is a nonsense.

It is imperative that the test of “soundness” remains – why abolish it for an “easier” test if the result would be an unsound Plan? This smacks of “development at any cost.” Who wrote this white paper, surely not someone who has sustainability, climate change, biodiversity, democracy, inclusion and protection of treasured landscapes at heart?

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

The paper doesn’t seem to offer any alternative solution to the DtC which means strategic issues would not be addressed.

Problems with the DtC stem from the standard methodology requiring hugely inflated, unrealistic and unjustified numbers of homes – this inhibits rather than facilitates Plan making and co-operation across boundaries.

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]

Any standard method MUST take into account constraints such as Green Belt and sustainability and would be completely unacceptable if it did not. Further, an uncapped



standard methodology producing hyper-inflated unjustified housing numbers, such as that proposed, is completely unacceptable.

We do not support the proposed standard methodology, nor the existing methodology. We explain why here and would add that no evidence has been supplied for the need for 300,000 homes pa.

The proposed new “standard methodology” for calculating housing need is of particular concern because it could set the hare racing to find land (under any new Local Plan) for an entirely unjustified and unrealistic number of homes. This is due to the how the ONS housing need numbers are uplifted under the proposed standard methodology (in fact almost doubled in this area), in a failed attempt to address “affordability.” In Chiltern and South Bucks, the current affordability uplift applied to the ONS housing need figures in the emerging Local Plan is stated to be between 70 and 80% but under the current methodology that uplift is capped at 40%. Under the proposed new methodology, there would be no cap.

This would mean that a huge affordability uplift would be applied to the ONS number of homes needed, meaning that Local Plans could be looking to accommodate c 80% more homes than are truly needed in the Plan period. This is unjustified, unwarranted and completely irrational. The Government thinking behind the proposed method is that the more homes that are built, the cheaper they would become but we know this is flawed thinking because it is developers who build and they build to the market and simply will not flood the market with cheap homes.

Districts like South Bucks and Chiltern are “outliers” we would say; they don’t fit with this proposed standard methodology because the affordability uplift is far too high, unreasonably and impossibly so; and such districts are restricted by treasured landscapes such as Green Belt, AONB and SAC. The unrealistic housing need numbers created by the standard methodology act as an inhibitor to Local Plans rather than an enabler.

The proposed methodology takes no account of land value. In areas where land has a high value, affordability will never be achieved by this methodology. Affordability would only be achieved by the provision of council housing and compulsory purchase of land by the council.

We would support that up-to-date ONS housing need figures are used as a base for the new methodology. The current methodology uses out-of-date 2014 figures, whereas the ONS housing need figures have fallen in the years since. This means that the housing figures under the currently emerging Plan are completely out of date and then, to add insult to injury, have a (capped) 40% uplift added and then a 10% buffer on top of that. This is bad but under the new methodology, there would be no cap to the uplift.

We suggest that the base start point for the new methodology should be the lower of the up-to-date ONS housing need figures or 10 year migration variant. This is because since 2014 (6 out of the previous 10 years) projected ONS housing growth has been FALLING. It is



beyond doubt that any Plans currently going through examination based on the 2014 data are seeking allocations for housing that are too high and unsupported by data.

With the new methodology, any new Plan would be looking to build even more homes for people who will never even exist in the Plan period. We suggest removal of the affordability uplift – it does not work, as explained below.

You say that the new methodology is “targeting more homes into areas where they are least affordable” but that does not make them affordable. This is because the very definition of affordable housing put out by the Government is not affordable. Shared ownership housing is market priced housing. Affordable rent is “up to 80% of market rent”. Developers avoid affordable housing contributions by exploiting the “viability” loophole and “established use plus” land value ruse. Developers’ viability statements go without proper challenge before planning committees – and that is if the applications even reach a planning committee. Removal of referral to planning committee and increase in decisions by delegated authority are eroding democracy and input from local communities.

The new element of a “percentage of existing housing stock levels” in the methodology does not take into account protected areas which should remain protected, properly protected. What makes our shires such an asset to local communities are their treasured landscapes such as Green Belt, AONBs, Conservation Areas and SACs. All that a fixed percentage starting point does is to draw more development into areas which already have more development, rather than a levelling up. Times and working patterns have shifted.

We disagree with the statement “the affordability of homes is the best evidence that supply is not keeping up with demand” which should read “the unaffordability of homes is the best evidence that the affordable housing policies are failing because developers are exploiting loopholes such as the “viability” ruse and land-banking,; Government is not building council housing; and land values are simply higher in some areas than others for reasons unrelated to supply of housing which can never be managed by a “standard methodology” such as this.”

This type of standard methodology with its irrationally high uplift in outlier areas of high land values would entirely fail in its object to deliver affordable housing; it would be unsustainable; it is alienating communities and just leads to loss of treasured landscapes, and unjustified overdevelopment based on inflated, trumped up housing need figures.

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]

No. This simply would not work. See our full comments at 8a above.



9(a). Do you agree that there should be automatic outline permission for areas for substantial development (*Growth* areas) with faster routes for detailed consent?

[Yes / No / Not sure. Please provide supporting statement.]

No. Applications and Plans must be more visible and accessible and engage more people. This must not be at the expense of democratic processes and government must understand that making a system more accessible, simple and quick is not the same thing as making it more democratic or enabling the best outcome.

The proposals would make the planning process less democratic and inhibit the ability of individuals to participate in the process. If permission is given at the Plan-making stage, this removes democratic, local input and proper over-sight and scrutiny. How would sustainability and infrastructure issues be assessed? How will environmental impact be assessed? What if more and more applications come forward, competing and conflicting with each other and over-stretching the landscape and infrastructure yet automatically entitled to outline permission under a pre-determined Local Plan?

No detail has been produced about the zoning system.

S.106 Agreements are vital to make applications acceptable in many cases and to cover mitigation.

How would surveys such as traffic surveys fit into this process?

The proposals are a case of speed over careful consideration.

9(b). Do you agree with our proposals above for the consent arrangements for *Renewal* and *Protected* areas?

[Yes / No / Not sure. Please provide supporting statement.]

Absolutely no. Here we see double-speak again. "Protected areas" should be exactly that – PROTECTED not simply subject to "restricted" development. How restricted? What does this mean? Green Belt MUST remain protected from development no ifs or buts. There is no need for its release; there is sufficient brownfield land available to satisfy housing need. And the algorithm housing "need" figure is so grossly inflated to be entirely fake. It would mean, in our area, an uplift of almost 100% on top of the ONS housing need figures.

With regard to "renewal areas" the same comments apply as in 9a above.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

[Yes / No / Not sure. Please provide supporting statement.]



No. The proposal focuses on speed rather than making the planning system truly democratic and protective of the environment, biodiversity, heritage, treasured landscapes, and capacity; and raises worrying questions about provision and adequacy of infrastructure.

**10. Do you agree with our proposals to make decision-making faster and more certain?
[Yes / No / Not sure. Please provide supporting statement.]**

No. For streamlined, read undemocratic! The proposals focus on speed and certainty for developers rather than a real commitment to make the process more democratic and sustainable. The public would be largely cut out of the planning process. Planning would become centralised and local communities ignored. This would only entrench existing problems.

Planning committees would feel pressure to grant applications for fear of having to return planning fees to unsuccessful applicants.

Design codes would be very subjective.

Delegation of detailed planning applications to planning officers should not happen – community involvement is essential, not just at Plan making stage.

11. Do you agree with our proposals for accessible, web-based Local Plans?

[Yes / No / Not sure. Please provide supporting statement.]

No because this will disenfranchise a large sector of the population and would inhibit public engagement with everyone in a community. Even tech savvy people may not have the latest technology to enable the viewing of large, complex maps and master plans. Whatever web-based system is used, documents must be retained and available at council offices and libraries.

There is also an issue with the “Objective” portal currently used by Bucks Council to input consultation responses. Many people cannot use it, it is clunky and inhibits responses from the public. Council employees are tasked with inputting responses but frequently miss out public responses or wrongly interpret or summarise them and the search function doesn’t work properly.

There is no guarantee that the tech used would be good.



12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

No. Speed again is being used to justify stripping democratic input. It is absolutely ESSENTIAL that the public examination stage, the right to be heard in person and interrogate the evidence, be fully retained as now as part of the process. It is not sufficient to propose that inspectors will have discretion. And self-assessment by local planning authorities would be entirely unacceptable.

The proposal that the public will only be able to comment on the Plan for the first time is at Stage 3 is unacceptable.

The proposal that public responses to a Plan should have a word count limit is entirely unacceptable.

The imposition of hugely inflated housing need figures is acting as an inhibitor to Plan making as the targets are unjustified and would not address affordability because developers are not in the business of building cheap housing; they build to the market.

The 30 month timescale is unrealistic, and threatening councils who fail/can't realistically comply is very unhelpful. The system won't work as a democratic system.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]

Yes. Although it is difficult to see how Neighbourhood Plans would work in the proposed new zonal system. Neighbourhood Plans should have the ability to zone and determine issues such as housing numbers and density because otherwise they would be meaningless.

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

Your objectives are flawed and focus on speed and centralisation rather than democracy and genuine public participation. Digitalisation would disenfranchise and inhibit many. Design is hugely subjective and shouldn't be cast in stone. Communities are more worried about climate change, biodiversity, special landscapes, infrastructure, sustainability, density, social housing (rather than un-affordable government definition of "affordable" housing), protection of green belt, heritage and Natura 2000 sites. It is very condescending to reduce neighbourhood planning to "design."



14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support? [Yes / No / Not sure. Please provide supporting statement.]

Yes. Too much land banking happens. Hundreds of thousands of homes with permission remain un-built. Planning permissions aren't implemented; developers sit on land. If planning permissions are not implemented, they should be revoked.

Merely imposing a requirement on local authorities to allocate more land for development of an unjustified up-lifted number of homes will not result in more affordable or quicker development. Developers build to the market and they do not build cheap housing on the open market.

15. What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/ or poorly-designed / There hasn't been any / Other – please specify]

Design is not the problem. There are good policies currently in our existing Local Plan which help guide appropriate design without being prescriptive or running to pages of diktat – the right design in the right place is already catered for. Other issues are far more important; your design proposals are fluffy. Quality of build and minimum space requirements would be helpful.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

Protection and retention of our Green Belt and restraint on development within 5.6km of the SAC/Natura 2000 site are priorities, together with climate change. The government should stand by its promises to protect our Green Belt full stop and stop the weasel words such as “preserve the green belt as far as possible” which are meaningless.

Sustainability is not at the heart of your proposals – speed and development at any cost are. How does carbon reduction fit with objectives to deliver housing and good design; how will carbon reduction be achieved? The new planning system must align with the Climate Act, the Environment Act, protection of SACs, AONBs and Green Belt.

More trees are a priority – and not removing the ones we already have, only to replace



them with twigs.

People need their cars for a myriad of reasons and space to park them. Genuinely safe cycle routes are great but designing out cars won't work. Fortunately, greener car design is improving all the time. More tram systems, as are seen all over Europe, would be great to see.

17. Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement.]

No. Your proposals are fluffy and unworkable in each local context. Standard toolkits would result in cookie-cutter designs.

How would the 'twin track' approach work?

How would local design codes or pattern books work in light of permitted development rights?

As mentioned above, design is not the problem. There are good policies currently in our existing Local Plan (and Townscape Character Study) which help guide appropriate design without being prescriptive or running to pages of diktat – the right design in the right place is already catered for. Other issues are far more important i.e. sustainability, climate change, quality of build and minimum space requirements.

The front of the White Paper shows Nansleden in Cornwall, which has successfully developed and used a local design code. BUT a key factor in the success of the code, however, is the control that the Duchy of Cornwall has over what development and changes are allowed in the area. They have much more control than a local planning authority.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief of officer for design and place-making? [Yes / No / Not sure. Please provide supporting statement.]

No, there are far more important issues to be tackled and which require funding. Design is not currently an issue. How would a "Chief Officer for Design" for each authority be resourced and funded? As mentioned above, there are far more important issues than



design. A new body to support design codes again would come at a cost and the former CABE closed in 2011, unable to secure significant improvements.

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes / No / Not sure. Please provide supporting statement.]

No. Four questions already on design! There are far more serious issues, see above.

20. Do you agree with our proposals for implementing a fast-track for beauty?

[Yes / No / Not sure. Please provide supporting statement.]

No. Five questions on design/beauty! There are far more serious issues, see above. There are far more important factors and beauty should not be one that leads to fast-tracking.

21. When new development happens in your area, what is your priority for what comes with it? [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other – please specify]

Protection of the green belt and treasured landscapes, biodiversity; heritage and Natura 2000/SACs; climate change; net zero; sustainability; proper affordable housing (not the government definition of “affordable” housing which is in fact unaffordable); and good infrastructure are all imperatives.

22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?

[Yes / No / Not sure. Please provide supporting statement.]

22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]

22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?



[Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement.]

S.106 obligations should be retained and not abolished. They are essential to mitigate and make developments acceptable in many different ways and help deliver affordable housing.

How would the new planning system ensure proper infrastructure and its funding, no detail is given?

Simply building more homes will not address affordability, as mentioned above.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]

Yes but subject to comments above.

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]

24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes / No / Not sure. Please provide supporting statement.]

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]

24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]

Section 106 agreements are currently a critically important route for delivering affordable housing and any new system must aim to secure at least the same amount of affordable housing and ideally more. We are concerned however that much more detailed modelling and policy development needs to be undertaken to make sure that this commitment is met. However, more generally, the government policy on affordable housing is completely failing people due to the definition of "affordable housing" including housing (such as shared ownership and affordable rent) which is simply not affordable in expensive areas; and provision lying in the hands of developers who employ viability loopholes to avoid



providing affordable housing. Social housing is the only way to solve affordability issues in expensive areas.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

25(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

We agree that there should be a strong link between where development occurs and where funding is spent.

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

These proposals would disenfranchise those who cannot access information or comment on applications or Plans digitally and such commentators must not be excluded from planning processes.

We hope that you will take these comments into consideration.

Yours faithfully,

Alison Wheelhouse
Chairman
The Beaconsfield Society