

Planning for the Future Consultation  
Planning Directorate  
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Dear Sir

### **Planning for the Future White Paper**

The Kent Association of Local Councils (KALC) represents just over 97% of Parish, Town and Community Councils and Parish Meetings in Kent, representing an electorate of over 700,000 across the range of suburban, rural and urban Kent.

We welcome the opportunity to respond to the Government's Planning White Paper. We have already responded to the Government's earlier consultation on Changes to the Current Planning System. We agree that we need to improve and expand the housing stock nationally and to increase economic growth across the country. However, we are strongly of the view that the White Paper and the consultation on Changes to the Current Planning System do nothing to improve this situation and in fact it would appear that new housing will be built predominantly in London and the South East, where in the latter it would increase by 23% to 61,000.

We recognise that the planning system could be improved, but fundamentally disagree that local planning authorities and the planning system are responsible for the non-delivery of housing. Not only are 90% of planning applications approved, there are also in the region of 1 million planning permissions that have not been built out. Rather than focusing on the planning system, Government should be looking at how to ensure that developers build the houses that have already been given planning permission, including a housing delivery test on developers and relevant sanctions if they fail to deliver.

There are many areas in the proposed new Planning system which give rise to great concern such as:

- Standard Housing Needs Assessment methodology
- Infrastructure
- Reduction of democratic accountability
- Abolishing the duty to co-operate,
- How neighbourhood planning fits in,
- Lack of clear direction on climate change and health and well-being

#### **Standard Housing Needs Assessment Methodology**

We do not agree with the proposed methodology. Many Authorities will fail to deliver against their proposed target, either because they fail to release sufficient sites or developers fail to progress previously permitted sites. That does not engender confidence that the proposed methodology is other than simplistic and somewhat removed from the dynamics of the housing market, the motivations of developers and stated Government policies to "level up" around the country.

If the Government wishes to encourage house-building (and jobs) away from the South-East, it needs to recognise that the current and proposed methodologies fail to do that – unless parameters are adjusted to accentuate the role of existing housing stock and reduce the impact of Affordability.

### **Infrastructure**

It is essential that supporting infrastructure is put in before housing development takes place, as existing infrastructure will be unable to cope with additional houses i.e. “Infrastructure First” as quoted by the Government.

The current system of developer contributions i.e. CIL & Section 106 serve the community better than the proposed new system. This is especially true when examining the proposal to delay payments until properties are sold. Such a change would delay payment for several years and so severely disadvantage the community.

Will Government provide funding or loans to local authorities so that this essential infrastructure is put in place as the proposal is that developer contributions should not be paid until housing occupancy will take place?

Has detailed modelling taken place that shows that the new Infrastructure Levy will raise more funds?

### **Reduction of Democratic Accountability**

There is one piece of certainty in this White Paper - it will reduce democratic accountability. It will reduce local communities’ opportunity to be involved in development plans and planning applications.

The traditional process of politicians deciding planning applications with opportunities for the public to make representations is effectively at an end. What will be the point of local planning authorities?

The removal of control through the continuing expansion of permitted development completely bypasses democratic scrutiny. Authorities have no control over most of the development which takes place in urban areas. This loss of democracy is a result of the Government’s reforms to the existing planning system which have been taken forward prior to the White Paper being published.

The White Paper extends this trend of centralisation and loss of control:

- The loss of rights to be heard in person at plan enquiries
- The removal of democratic accountability of planning applications in Growth Zones
- The centralisation of development management policy
- Nationally prescribed guidance on design codes

The White Paper does not provide a single new right for community participation nor a single new opportunity for a democratic moment in the plan-making process. There is no basis to the claim that this system will ‘democratise’ planning. It does nothing to give communities control over their future.

### **Abolishing the Duty to Cooperate**

In order to have an effective planning system, it is essential that local planning authorities engage and cooperate with each other and other public bodies on proposed strategic

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developments i.e. transport infrastructure, impact on air quality, environment etc. There should be more cooperation, not less. The proposed abolition of the duty to co-operate is therefore very worrying, particularly as no alternative has been offered.

### **How Neighbourhood Planning Fits in?**

Even Neighbourhood Planning has an unclear role within the future system, despite the White Paper stating that the government 'thinks' they should be retained. There is a real lack of clarity about the scope and power of such plans in decision making. The current proposals would appear to reduce the role of Neighbourhood Plans to local design guides.

What is the scope and status of Neighbourhood Plans? How will they fit into the new zone-based Local Plan?

### **Lack of clear direction on climate change and health and well-being**

The White Paper does not address carbon reduction matters, climate adaptation and the need to secure flood resilience. What is the rationale for extending the deadline for all new houses to be carbon neutral to 2050?

We also call on Government to ensure that all planning applications and future local plan allocations have a robust air quality assessment with mitigation before development permission is given or an allocation made in a Local Plan. Alongside this, local authorities should undertake monitoring of Particulate Matter (PM2.5/10) on those roads which are directly impacted by manufacturing and mineral operations, in addition to their regular NO2 monitoring.

The White Paper also does not address how the proposed system will tackle other crucial issues such as health and wellbeing.

There are also legitimate questions over:

- The proposed standardisation and streamlining of Local Plans.
- And the future provision of social housing given the proposal to raise the exemption from affordable housing obligations from developments of more than 10 units to more than 40. Most rural developments are less than 40 units

**Local democracy may not always work for planning, but the White Paper's alternative is much worse.**

**Local Government is best placed to deliver change on the ground that is in the best interests of the public. Democracy must be enhanced not reduced and local councils must take back control of their planning powers.**

**That requires a fundamental change of direction in the Governments planning reform agenda.**

Yours faithfully

*Sarah Barker*

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