



Response to the Housing White Paper “Fixing our broken housing market” consultation

(May 2017)

Question 2. What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together?

To produce quality Local Plans, we strongly believe that communities should be fully involved in planning the places in which they live. We do not consider the current statutory consultation arrangements for Local Plans go far enough to enable this; statutory Local Plan consultations are far too often tokenistic, meaningless and difficult to engage with. We, therefore, advocate a more collaborative planning approach which provides real opportunities for active community participation at an early stage in plan preparation. We call on Government to adopt the seven core values drawn up by the International Association for Public Participation -

<http://www.iap2.org/?page=A4> as incorporated into our recent Collaborative Planning for All publication – available at: http://www.civicvoice.org.uk/uploads/files/Collaborative_planning_1.pdf and launched by Brandon Lewis MP in February 2015.

To ensure Local Plan making is not confined to ‘experts’, we advocate simplicity and the use of plain English in planning guidance. We also support the principle of streamlining the sheer amount of evidence produced for local plan examinations, which can act as a barrier for communities to participate in an important process, shaping the future development of their local area.

Question 3b) Do you agree with the proposals to: From early 2018, use a standardised approach to assessing housing requirements as the baseline for five year housing supply calculations and monitoring housing delivery, in the absence of an up-to-date plan?

The Local Plans Expert Group (LPEG) report highlighted that one of principal problems affecting the delivery of Local Plans is a lack of clarity and guidance in calculating housing need through Strategic Housing Market Assessments (SHMAs). Without a clear method for assessments, there are inconsistencies in approaches between local Authorities, they have become overly long and complicated and are endlessly debated. A lack of confidence in the calculation of housing numbers and overall development requirements is a concern we hear regularly from our members and is clearly a barrier to timely Local Plan production.

We support the principle of introducing a clear, simplified and standardised methodology. However, we await to see the detail of the proposed methodology and the justification for recommending the preferred approach as opposed to alternative methodologies. We would ask quite simply, how many homes does the nation need to plan for and over what period?

We would also like to draw attention to the fact that Local Plans should positively plan for all development requirements, not just solely housing. There is real concern from our members that the Government is becoming increasingly fixated on housing forgetting all of the other land uses such as employment, infrastructure, facilities and services that make up our rich and diverse local communities.

Question 4. Do you agree with the proposals to amend the presumption in favour of sustainable development so that: a) Authorities are expected to have a clear strategy for maximising the use of suitable land in their areas and b) It makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?

Yes, Civic Voice believes that every area should have an up-to-date Local Plan. A quality plan, with quality of place at its heart, shaped by local communities. It is unacceptable that 'less than 20% of Local Authorities can claim to have a fully up-to-date Local Plan' (Para. 1.7 of the Local Plans Expert Group Report, March 2016) and this has been further confirmed in the recent report by planning and development consultancy Lichfields, *Planned and Deliver, Local Plan-making under the NPPF: A five-year progress report*, which found only 36% of local planning authorities have adopted a Local Plan under the National Planning Policy Framework. The report authors warn this could expose two-thirds of councils to government interventions to encourage housing delivery and plan-making.

It should be a statutory duty on Local Authorities to produce and maintain an up-to-date Local Plan, which plans positively to meet local needs.

Question 10. Do you agree with the proposals to amend the National Planning Policy Framework to make clear that:

a) Authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?

Yes, we agree that Local Authorities should review all reasonable options to meet identified development needs before considering amending Green Belt boundaries. It is important to remember the five purposes of the Green Belt, as set out in the NPPF and the well-established test for releasing Green Belt land for development; 'in exceptional circumstances'. This is a high bar and the current NPPF gives strong protection to Green Belt; we would like to see this retained.

b) Where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality or accessibility of remaining Green Belt land?

Yes, but the compensatory measure should be made as close to the Green Belt area in question, rather than anywhere within the Local Authority boundary.

d) Development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt?

No, we would be concerned if the proposal led to 'nibbling away' and erosion of established Green Belt and inevitable resultant pressure to amend Green Belt boundaries.

Question 12. Do you agree with the proposals to amend the National Planning Policy Framework to:

a) Indicate that local planning authorities should provide neighbourhood planning groups with a housing requirement figure, where this is sought?

Yes, agree and we would question, is it not essential that planning groups have access to housing numbers needed/assessed for their area? Access to this information should be provided by the local authority under its duty to support Neighbourhood Planning.

A clear and tangible housing 'figure' for Parish/Town Councils and Neighbourhood Forums may also help to generate more proactive Neighbourhood Plans across the country, which welcome development.

b) Make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) are expected to set out clear design expectations; and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals?

Yes, in consultation with local communities. Design guidance should not stifle innovation but Civic Voice welcomes additional design guidance which encourages high quality design and ensures that new development reflects the local character and distinctiveness of our towns, villages and cities. Too often, new housing developments are far too similar to each other across the country, which is adding credibility to the phrase "clone towns".

c) Emphasise the importance of early pre-application discussions between applicants, authorities and the local community about design and the types of homes to be provided?

Yes, Civic Voice agrees with this proposal. We strongly believe that early and genuine participation with communities at the early stages of the process is key to delivering the high-quality homes the country needs. We have seen this demonstrated over the last three years through our Civic Voice Design Awards programme, the people's choice for architecture and the built environment, where past winners have included Gloucester Services (Northbound) and Alder Hey Hospital, Liverpool. More information on the Awards is available at: <http://www.civicvoice.org.uk/get-involved/designawards/>

What has been clear from the Awards is that communities are willing to welcome the new developments we need when they have been properly consulted and involved and where the quality of design has been of the highest standard.

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Civic Voice does not consider the statutory consultation arrangements for Local Plans go far enough to encourage communities to fully participate in the future planning and development of their local area. We have for some time argued for a collaborative planning process and asked in our manifesto in 2015 that Government should strengthen policy to support collaborative community planning.

‘Public participation’ means to involve those who are affected by a decision in the decision-making process. It promotes sustainable decisions by providing participants with the information they need to be involved in a meaningful way, and it communicates to participants how their input affects the decision. Civic Voice calls on the Government to enshrine this principle in the revised NPPF.

e) Recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be given weight in the planning process?

Yes, Civic Voice supports the use of Building for Life in assessing and shaping the design of new development and would welcome policy support for this.

Question 34. Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18-219 of the National Planning Policy Framework, together constitute the Government’s view of what sustainable development means for the planning system in England?

We agree that the National Planning Policy Framework document should constitute the Government’s view of what sustainable development means for the planning system in England. However, without seeing the proposed detailed amended wording of the current NPPF we are unable to support this proposal.

In general, we would comment that the three dimensions of sustainable development: economic, social and environmental sustainability must be considered equally throughout the planning process and in particular, environmental and social issues should be given more equal weighting on a par with economic considerations, in decision making. There appears to be an over-emphasis on housing numbers throughout the White Paper, and we must not forget that the building sustainable communities, which respect and conserve the character and local distinctiveness of our cities, towns and villages, should be at the heart of the NPPF.

In response to feedback from our members, Civic Voice also has the following general comments on the White Paper:

There is a real need for local communities to feel confident that their wishes are given full weight if they have undertaken the hefty task of producing a Neighbourhood Plan. Big developers with major resources are still seen to be able to challenge and override. Support for smaller developers and for self build is essential to break the stranglehold of the bigger developers.

In the amount of housing needed the NPPF needs to be able to look and empty properties - especially over commercial premises and support the improvement of town and city centres rather than the pressure all being on green field sites.

The belief that market mechanisms can "solve" the housing crisis should be robustly challenged. The white paper is inconsistent is relying on the market while seeking to shape it. Similarly it blows hot and cold on local versus central control. Other government policies, such as those on permitted development should be revisited since they would be inconsistent with some of the stated objectives in the white paper. There is no way to enforce either design standards or achieve strategic planning objectives given the current permitted development policies which have tied the hands of planning officers.

Once again, as in much of current housing thinking there is very little about social housing. For much of the rural community, so called "affordable housing" at 80% of market rates are just not available to people born and working in the countryside often on national living wage. The need and building of social housing must be significantly raised up the housing agenda of this country; be it through bringing back Council Housing or really supporting once again Housing Associations in building greater numbers of homes.

The creation of a Neighbourhood Forum takes years, far longer than most people are prepared to invest. Simplification of relevant forum creation procedures is overdue.

Expecting time and effort to be devoted to neighbourhood plans only makes sense if these can be expected, by participants to be in place for some time (say 10 years). If they are to be repeatedly reviewed volunteers will not put in the effort required. Furthermore, when a neighbourhood plan is in place, the community should have the confidence that this plan will drive the agenda locally. Where a planning application departs from the neighbourhood plan, the community should have a right to appeal this.

Civic Voice, 2nd May 2017