

WAKEFIELD CIVIC SOCIETY

Building Interest in Wakefield
www.wakefieldcivicsociety.org.uk



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Planning for the Future Consultation
Ministry of Housing, Communities
and Local Government
3rd Floor, Fry Building
2 Marsham Street
London
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Email: info@wakefieldcivicsociety.org.uk.

29th October 2020

Dear Sir or Madam,

Planning for the Future White Paper Consultation

Wakefield Civic Society was established in 1964. As a registered charity with an open membership made up of local people and businesses and a democratically elected committee of volunteer trustees, we have been responding to planning applications, meeting with developers and council officials and facilitating debate about the future of our city for over 56 years. We have, therefore, taken a particular interest in the proposals announced by the Government in the White Paper *Planning for the Future*.

As a member of Civic Voice, the national body for the civic movement, and YHACS, the regional association for civic societies in the Yorkshire and Humber region, we have also discussed our feedback with others in the movement both at national and regional level.

In summary, while there are some positive aspects contained within the proposals, many of the proposals lack detail and look as if they have not been thought through with any vigour. They leave too many questions unanswered and fundamentally shift the locus for discussion on planning matters away from the individual to the generic. In so doing, they introduce a democratic deficit by denying members of the public the right to comment on planning applications at the time they are lodged, assuming that the public will be content with being given a 'once in a lifetime opportunity' to comment on zoning schemes and design code content. We feel, therefore, that it is disingenuous to assert that the proposals will democratise the planning process.

The overall impression is that the proposals would have been better set out in a Green Paper to encourage debate about the ideas rather than as a White Paper which forces us to adopt a defensive position.

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Member of YHACS

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The White Paper appears to be predicated on the notion that it is the planning system itself which is causing a housing shortage. In fact, the Government's own figures strongly suggest that the shortage is caused by a collapse, in the 1980s and 90s, of the building of what we used to call 'council housing'. Private sector and housing association provision has, in fact, held up reasonably well over the years.

This is not surprising; the private sector exists to generate profits – it meets *market demand* and will therefore build houses when and where a profit can be obtained. To build properties in numbers which exceed market demand would lead to a reduction in value, and therefore an unviable level profit for housebuilders.

Local authority provision, on the other hand, was intended to meet *social need*. Unconcerned with profit, local authorities could build houses that were offered at affordable rents (i.e., below what the commercial market offered) to people who were unable to buy.

Expecting the private sector to fill the gap created by local authorities no longer building houses is unrealistic in our view, not least because the cost of housing to buy, or pay market rent, has outgrown the rise in incomes. This is a structural economic problem rather than a planning problem, and one which changes to planning legislation will not in themselves address.

Planning is a complex matter. Streamlining and simplifying the process must not be at the expense of producing poorer outcomes in either quality or aesthetics. Local people have local knowledge and they should be encouraged to participate in the planning process at all stages. It is unreasonable to suggest that it is local engagement that are to blame for problems with the current system. Buildings are designed to last a long time (or at least, they should be). What, ultimately, is wrong with spending a little more time to get the very best possible outcomes in place-making when the resulting product could be around for 40 to 50 years and possibly much longer? The planning process should be seen against the longer-term scale of how long the building/infrastructure/etc is design to last for.

There is a complete lack of reference to additional funding in the proposals. The White Paper states at 5.17 that 'The cost of operating the new planning system should be principally funded by the beneficiaries of planning gain – landowners and developers – rather than the national or local taxpayer.' As with the diagnosis of the housing problem, the proposal is framed with reference to those cities and regions, notably London and certain parts of the south east, with the highest land values. If the planning service is funded locally through planning gain, the results will be to give places such with lower land values, including Wakefield, a second-class service.

The question of resourcing also arises when it comes to digitisation of the planning system. The White Paper suggests that online technology will lead to efficiency savings but where is the commitment to fund the development of online technologies of a type that involve the public in the early stage of plan preparation and in routine applications in renewal areas? IT development is notoriously expensive and can take a considerable time to get right.

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We wonder if, in fact, an IT system can be devised and rolled out quickly enough to support the transition to a new system?

There are currently many deficiencies in the way that local authorities make data and information available to the public and these are perhaps a more pressing concern in the immediate future. They certainly need to be addressed, whatever happens next.

As currently written, therefore, we feel we **cannot** support the proposals in the White Paper. Our rationale is set out in the following pages.

Yours sincerely,

[By Email]

Kevin Trickett MBE,

President

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Planning for the Future – General Comments

1. *Local plans and zoning*

We would like to think that Wakefield Civic Society has played an important role in devising Wakefield's current local plan. We took part in 'town team' discussions nearly 20 years ago as part of Yorkshire Forward's Urban Renaissance programme, where Wakefield was one of six towns and cities selected in the first tranche of an urban regeneration programme implemented across the region. The early discussions, which were facilitated by Wakefield Council, Yorkshire Forward and an external consultancy, led to the creation of a Vision for Wakefield and from that vision, the Strategic Development Plan and today's Local Plan were drawn up and we were able to offer comments at each stage.

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Planning applications and development proposals for the city are still benchmarked against the Local Plan and it is possible, for those in the know, to track the origins of key developments still being implemented across the city today.

Wakefield Council is now embarking on an update to its Local Plan and has commissioned a master-planning exercise for the city centre in which the Society will once again play a full part. We are represented on the Council's Town Deal Board/High Street Task Force and know that our voice is listened to and respected.

Overall, therefore, we welcome any proposals which will allow the general public and organisations such as civic societies to continue being consulted at the earliest possible step in the strategic planning process. The difficulty lies in how to ensure that the consultation is meaningful and how to deal with the specifics of individual planning applications if there is to be a reliance on over-arching approvals linked to zones and design codes.

While we have been involved in discussions and members of the public and local businesses have been given opportunities to get involved or to express their views on proposals, it is clear that, in practice, not many people actually pay much attention to the detail when it comes to strategic planning. Unlike the Society, the general public does not, in the main, track the progress of plans over long periods. In part, this is because of a lack of awareness of the process but we also suspect it is because that it all takes up a lot of time, especially to do it well – time which people going about their daily lives or running a business just don't have to spare.

It is much more realistic to expect that members of the public will pay attention to a planning application at the point when they realise it will have a direct impact on their own property, street or area, but, even then, it is often the case that some people wake up to the implications of a development proposal only as 'the bulldozers move in', by which time, it is, of course too late. Implementation

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of the proposals in the White Paper will actually remove opportunities for members of the public to engage in individual planning applications just at the point where they are most likely to want to get involved under the current system.

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The challenge, therefore, for any move to ‘front-end’ the consultation process by giving people a chance to be consulted on local plans, zoning arrangements and design codes, but only at the start of a strategic process, will be how to make sure that the general public, local businesses, third sector organisations and so on are engaged in a meaningful way. This will require more than articles in local newspapers or on local authority websites. It will take time and effort to set up consultation events, to educate and inform people so that they can contribute to the debate effectively. Even then, it is possible that many people will just not have the time to devote to the consultation process so the debate will once again be left to ‘interested parties’ – such as local civic societies and other organisations that take a particular interest in planning matters.

Another problem with allowing engagement only at the front end of a planning process is how to deal with people who move into an area or who come of age after a local plan, development zones and design codes have been agreed. How do such people respond to development in their area if the plans conform to zoning arrangements and design codes agreed by others in the past? In our view, this produces a significant democratic deficit. Will there be any override allowed for the local authority, Planning Inspectorate or even the courts to set aside zoning areas should the community object to a new development?

Of course, it could be argued that people should do their research before moving into a particular zone; they should know what might happen. But how can anyone forecast what might happen into the future? Having a design code won’t of itself lead to development going forward and it could be some years after a design code has been prepared that a developer comes forward with a proposal. The point is that, at this stage, members of the public will not be able to object.

It might equally be argued that the proposals on zoning are not that much different from current arrangements where local plans identify areas for economic, industrial, residential and leisure activity for example. But the difference is that under the current arrangements, people can object at the time a planning application is being lodged. That, it appears, is a right that is being removed in the new proposals, particularly in the ‘Growth’ areas.

2. Strategic Planning

The White Paper proposes to abolish the duty to co-operate but does not provide an alternative. In the past, the Regional Spatial Strategy for Yorkshire and Humber devised by the Yorkshire and Humber Assembly enabled us to see how

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infrastructure decisions were being made and implemented and to understand the rationale behind strategic planning decisions. As a civic society, we were able to feed our views into the planning process at regional level, either directly or via our regional association, YHACS (the Yorkshire and Humber Association of Civic Societies).

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Since regional planning authorities were dissolved, the position is now much less clear. We have a West Yorkshire Combined Authority, Local Enterprise Partnerships, The Northern Powerhouse, Transport for the North and so on – and now there is the prospect of a West Yorkshire Mayor to add to that mix. All these bodies are, or will be, taking decisions on our behalf but it is increasingly difficult for the public, even ‘informed’ bodies such as ourselves, to keep track of what is going on and to take part in consultations.

If the duty to co-operate is removed, how will decisions about what goes where and how it all joins up be taken? Who will make the decisions? And what arrangements will there be for the general public to be consulted?

3. Design matters

Sadly, the current planning system, including permitted development rights, has not guaranteed quality of design or place. We still see too many poorly designed schemes being proposed – from householders putting forward what we regard as ugly loft conversions or extensions (that often dominate and overwhelm not only the original property, but also neighbouring properties) to major schemes for business, retail and even residential developments. While the former can at least be explained by the fact that not everyone is a gifted designer, there is no excuse for the latter where, we assume, architects and planners have dedicated considerable effort and presumably expertise in finalising the details.

We were, therefore, encouraged by the proposals in the Building Better Building Beautiful Commission report, *Living with Beauty*, when it called for more emphasis on beauty. Quality of place, both in terms of the public realm and the buildings that surround it, are hugely important to overall health and wellbeing and we welcome the White Paper proposals to establish a national design body to focus attention on design principles and quality. Similarly, we see design codes as playing a useful part in helping to improve design quality.

Of course, what constitutes beauty, from aesthetics to the harmonisation of form and function will to a degree be subjective, although we are of the opinion that certain objective tests can be applied to the latter. In this sense, a design body could have a role in establishing certain minimum standards.

While the use of design codes is a positive aspiration, to be effective tools for enhancing place making, design codes will need to be place specific to take account of local context and to promote styles and materials which suit the local

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vernacular. Design codes cannot be set centrally nor can they be vague; they will need to be sufficiently detailed to offer some degree of outcome certainty while avoiding the uniformity of outcomes we see today where new housing developments all look very much the same in whichever part of the country they are built.

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Enforcement of the design principles will be key – else why have them at all – and this suggests some degree of scrutiny and review will be needed before building work is allowed to commence. Presumably, as now, this will be the role of the local authority and we see no reason why such scrutiny and opportunity to comment or even object cannot be extended to members of the community at the same time. If nothing else, this will ensure that developers are not allowed to ride roughshod over local concerns.

However, the use of design codes raises questions. How long will they last? What will the review process be? Will exceptions be allowed and, if so, in what circumstances? How will innovation be encouraged if developers have to conform to principles codified in the past? How flexible will they be to allow for unforeseen events (such as those which arose under the current Covid epidemic)? And, if beauty is to be the linchpin of design approval, how will what is ‘beautiful’ be determined? Is it to be discretionary or consensus based?

4. Housing provision

As stated in our covering remarks, we think the White Paper is being put forward in an attempt to correct a housing shortage. We think that the causes of the housing shortage lie outside the planning system and changes to planning law are unlikely to address this although they might reduce some of the uncertainty for developers. While ever house building remains within the private sector, profit will always be a driving consideration and the private sector is unlikely to build houses in sufficient number to cause a fall in house prices. Almost inevitably, the major housebuilders will want to ration or otherwise holdback new houses until they are satisfied that there is market demand for the houses they build.

It is possible that some developers might see quick wins if given a free hand to develop sites within Growth zones, but design codes and building regulations will need to be applied diligently and compliance enforced to prevent new homes (or office conversions) being built to low standards.

5. The use of digital technologies

The move to on-line presentation of planning applications through the planning portal has made community engagement much easier and more democratic. It is much easier for community groups such as ours to discuss applications and to lodge our comments with the local authority.

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However, there are some inconsistencies that need to be addressed in future. These include planning documents being added then removed from the planning portal, comments from individuals and community organisations being shown on-line in different ways and sometimes not appearing at all, and varying standards of plans put forward by developers.

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As a minimum, we would, for example, expect to see measurements being quoted on all plans (rather than just scales, often related to the size of the paper the original plans were drawn on and so almost impossible to calculate from when viewed on screen). For larger developments, we would also expect to see architects' drawings that show how the completed development will look and sit within the landscape. Cross-referencing with design codes should be mandatory.

We do need to recognise, though, that not everyone will have access to on-line plans and this needs to be addressed. Exhibitions and public consultation events for larger schemes can and do play an important part in the planning process and these should be retained. But there also needs to be wider engagement with the public through, for example, social media platforms, where planning applications, particularly for any major scheme or where aspects of a development might be considered controversial, are brought to the attention of the public using social media tools. Inevitably, provision will need to be made for people without access to IT or who are unable to use it.

6. Built Heritage

While the White Paper sets out what steps might be taken to protect our built heritage, there are no questions relating to the subject, which is rather odd.

We wish to put on record our own commitment to the preservation of heritage assets while recognising that not everything that is old can or, indeed, should be preserved. What is important, however, is that there is an opportunity for a debate to take place around planning applications that affect such assets. There does, however, need to be concern for the environmental impact of demolishing buildings rather than re-using them in some way.

While the designation of some areas as 'protected zones' is welcome, not all old buildings of heritage value are listed or sit in Conservation Areas and it is not clear how such buildings would be given protection if included in Growth or Renewal areas.

We have recently approached Wakefield Council with a proposal to revisit the list of buildings of local interest with a view to adding more entries. It is also possible that we might decide to nominate some buildings for national listing. What would the impact be on an area designated for Growth or Renewal if buildings are listed after the zoning work had been completed?

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7. Neighbourhood Plans

Wakefield Civic Society has played no part in the drawing up of neighbourhood plans; we made a decision some time ago that the work required was too demanding in terms of time and commitment for a group such as ours, run entirely on volunteer effort. However, we know that there are neighbourhood plans in our area.

Whether or not the notion of neighbourhood plans is retained going forward, we urge caution in the way existing neighbourhood plans are treated under the proposals. Local people will have expended considerable time and effort in drawing up their plans and may yet be involved in work to create new plans. To simply sweep them aside as part of any review would send out very strong signals about the value the Government attaches to this effort. It would also risk undermining future community engagement in the planning system – why would anyone want to spend time and effort engaging with a planning system – be it in drawing up zone boundaries or writing design codes if, come the next planning review, all their work is to be set aside?

Tensions will, of course, arise, if under the new proposals an existing neighbourhood plan area is redesignated as one of the new Growth or Renewal areas; will the new classification have to take account of an existing neighbourhood plan or will the new zoning category trump all that has gone before?

8. Wildlife and Biodiversity

We are pleased to see reference (at 3.22) that the reformed planning system will continue to protect the places of environmental and cultural value which matter to us.

We have, however, seen comments by other groups fearful that the new proposals don't offer sufficient protection for natural habitats, biodiversity and wildlife generally. We would therefore like to better understand the detail behind the new proposals before giving them our unfettered support.

9. Sustainability

The Covid epidemic is forcing us all to re-think our approach to the way we live and use our natural resources. The impact on the environment of all development activity needs to be much more carefully appraised in future. This includes the choice and source of building materials, the way in which buildings are constructed and insulated, how infrastructure is integrated into new schemes, from energy provision to public transport, and how we make use of the private car. Too many housing and office developments lock in car dependency at the planning stage.

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We welcome, therefore, the proposals' assertion that 'Local Plans should be subject to a single statutory "sustainable development" test' but want to see much more detail around how this will work and the sustainability test needs to drill down to the level of individual developments.

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10. Conclusion

Some of the proposals have merit – if they can be made to work.

Early engagement in local plans, determination of zoning boundaries and design codes is welcome. But that engagement must be meaningful. Local authorities must not be allowed to ignore the voice of the community and should, in fact, have to find new ways of including the community in the planning process. We wonder if it could be made a mandatory requirement for community groups such as civic societies, for example, to be consulted in the creation of local plans in future. This would be somewhere between what happens now and classifying us as statutory consultees in the current sense of the term. The White Paper needs practical and specific proposals to enable local amenity and community groups to be consulted at an early stage on proposals.

We are much less happy with the way the current proposals would deny the public and community groups to comment on individual planning applications and urge most strongly that this facility be retained.

Yes, the current planning system has its problems, but we would much prefer to see the good bits being retained rather than being jettisoned in the vain hope it will simplify the process. Planning is undeniably complicated because it introduces so many variables. It cannot be streamlined on a whim without jeopardising some of the democratic tenets we hold dear.

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Planning for the Future – Response to specific questions

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

This is a rather peculiar question that seems, given the justification for the White Paper, to invite negative feelings about the existing system. We assume you are not looking for words such as ‘effective, essential, and engaging’, even though the current system is all those things. We do accept that further enhancements could be introduced to make it even better but we don’t want to see the baby being thrown out with the bathwater in a misguided rush to replace rather than overhaul what we have already.

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2. Do you get involved with planning decisions in your local area?

Yes

2(a). If no, why not?

N/A

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?

Publication of planning applications and strategic planning matters needs to be multi-channel; local papers, on-line, including social media, by email and by public events, exhibitions and displays.

4. What are your top three priorities for planning in your local area?

As a Civic Society, our priorities are to promote good design, architecture and town planning in all aspects of place-making whether this be the building of new homes or the re-purposing of existing buildings. This includes sustainability criteria including consideration of the carbon footprint of new developments.

We are keen to see our city centre regenerated to reignite the local economy. We want to see new uses for existing but redundant buildings, boosting the residential population within the city centre itself by providing new homes there, where they would be close to transport hubs and offices/jobs. The creation of new public spaces with high quality landscaping and planting to boost biodiversity within and around the city is also seen as an important part of quality place-making.

But we also want to protect our built heritage. We have some splendid buildings that have, in some cases, been badly neglected. Neglect should never be rewarded in the planning system and we want to see better enforcement of the existing protections for heritage assets.

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5. Do you agree that Local Plans should be simplified in line with our proposals?

It is far too simplistic to think that Local Plans can just be simplified. Planning at a strategic level is necessarily complicated because there are so many factors to be considered. It is, in our view, a mistake to undertake a review of the planning system on the premise that simplification itself should be a desired outcome. A much better focus of the review would be how to achieve quality outcomes in terms of place-making, including identification, enhancement and development of character areas such as Conservation Areas, residential provision and quality, and overall sustainability.

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

No. Development should not be rushed and it is important that all aspects of a development proposal are considered in light of local context. It is important, therefore, that local authorities retain the flexibility to adjust local plans in light of local circumstances and priorities.

The National Planning Policy Framework was an attempt to simplify planning – but then had to be strengthened (twice) to correct what had, in fact, been an over-simplification.

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?

This will depend on what the detailed proposals contain. Our increasing environmental awareness and concerns about climate change should require all new development to be sustainable in its widest sense and subject to rigorous assessment.

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

No man is an island, and no local planning authority can work in isolation. The West Yorkshire region is a compact one, but it is one of the most densely populated regions in England. With three cities all within a few miles of each other and major conurbations, what happens in Leeds doesn't always stay in Leeds. We used to have a regional planning authority and a regional spatial planning policy which was easy to understand.

Today, the position is much more confused and it isn't easy for communities, and community organisations such as ourselves, to engage effectively in cross-boundary planning matters. Assuming the West Yorkshire devolution deal is implemented, we would probably look to the office of the West Yorkshire Mayor to coordinate regional planning matters – but arrangements will also be needed to liaise with other council areas. What is important from our point of view is that any regional coordination is transparent and affords the community an opportunity to engage in the process.

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8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

We have no strong feelings about this. We understand that a switch to the proposed method would make very little difference in our area (a small annual increase in housing numbers). What we want to see is a new way of allocating land that ensures more inner-city brownfield sites are used rather than continuing to build urban extensions into green field (and often Green Belt) areas.

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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?

We are not convinced that releasing more land more quickly will have a significant effect on either availability or the affordability of housing. (There is a finite limit to the number of new houses any developer can build in terms of financial outlay, access to materials and skilled labour.) We certainly do not want to see further tracts of green field and Green Belt land opened up to development not only because of the negative impact this has on the environment but also because continuing to build outwards in this way serves to increase the dependence on cars.

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?

This will depend. If a developer is contracted to build something which is detailed in the local plan (and in accordance with a specific design code), the automatic permission might be advantageous subject to reserved matters being presented for scrutiny and comment by the local community.

However, if the local plan is vague or merely suggestive of what might happen on a particular site, and/or the design code offers a list of variables from which to select, then any detailed application that is submitted must be subject to scrutiny and provide the community with an opportunity to comment.

The Growth Area concept is predicated upon the capacity of planning authorities to prepare sufficiently detailed masterplans which would both test development feasibility sufficiently and guide developers' proposals. However, due to the progressive reduction in staffing over the last ten or more years, we understand that such work will likely have to be outsourced to private planning consultants which challenges the democratisation principle once more.

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

This looks like an extension of permitted development rights. In our view, the general presumption in favour of development introduced in the National Planning Policy Framework has already eroded the ability of community members to make effective challenges to planning applications and permitted development rights have, in effect, removed the opportunity for comment completely. There has already been much negative coverage of poor-quality office to residential conversions that have been allowed under permitted development rules. If there is to be a focus on beauty in the revised planning system, there should be a means

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to develop a consensus around what beauty is within any given scheme or area. It is difficult to see how that can be achieved if consents are pre-determined.

We welcome the proposal to require full planning applications in 'protected' areas but think that permitted development rights should be removed for these areas.

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As a Civic Society, we take an area-wide view of what happens in and around Wakefield. Permitted development rights deny us (and others) the opportunity to comment on matters which relate directly to our charitable cause.

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

No. It is not clear how this would work in the absence of regional spatial plans and how communities most likely to be impacted by such developments could engage with the detail. Work out what you want to do and ask us again if we agree.

10. Do you agree with our proposals to make decision-making faster and more certain?

Speeding up the planning process is a laudable aim but care needs to be taken when working out the detail. We don't see how something as complicated as a planning application can, in effect, be determined by an algorithm. Every planning application needs to be scrutinised at some point by people with local knowledge.

We welcome the overall approach to use digital processes to support the planning system although it could disenfranchise those not on-line and a suitable alternative will need to be provided for those who cannot engage via the internet.

One aspect of digitisation that would be beneficial is the standardisation of process and minimum standards being set for the quality of information submitted with any plan (for example, drawings containing measurements and featuring legible annotations).

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

Yes, subject to provision being made for those not able to use on-line technology.

12. Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans?

This is very ambitious for the first pass following the introduction of a new system and we doubt that it is realistic, however deservedly aspirational it might be. It must be recognised that only a minority of communities have the capacity to develop their own plan but that does not mean that they have no wish to engage in detailed development proposals as they arise.

It is also conceivable that, if all local authorities start work at the same time, there will be logjams in the system caused by competition for resources (local authority staff, planning consultants) and impact on the Planning Inspectorate.

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13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

Where they have already been set up, it is important that they are maintained as a sign that the work already done by communities is valued. There will, of course, be issues to work around as to how the new zoning arrangements can work alongside existing neighbourhood plans. As to whether or not new neighbourhood plans should be encouraged under the new system, it must be recognised that only a minority of communities have the capacity to develop their own plan but that does not mean that they have no wish to engage in detailed development proposals as they arise.

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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?

No comment.

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?

Here lies the root of the problem that the White Paper sets out to achieve. By recognising that planning approvals do not always lead to rapid build out, it shows that the shortage of housing is not the planning process but the way in which developers take schemes forward – building new homes as they find buyers to match. Yes, new schemes could be taken forward by several development companies/housebuilders but perhaps some sort of time limit, not on the date development starts but on the date it is to be completed – with penalties attached for failure to meet it.

15. What do you think about the design of new development that has happened recently in your area?

Mixed.

Some ‘public’ and commercial buildings (such as an extension to our local Theatre Royal for example) have been exceptional while others have been more generic. We run an annual design award scheme and the quality of both new build and historic refurbishment projects that we have recognised over the years shows a satisfying and consistent trend for better quality of both construction and design aesthetic and in both ultra-modern and traditional properties.

When it comes to housebuilding, however, it seems that the most innovative designs come from individuals and small developers. Most of the volume housebuilders provide developments that lack character and any sense of local identity or distinctiveness.

Time and time again, we see the same sort of boxes dropped into labyrinthine cul-de-sac layouts where far too much prominence is given to private cars. Note that while these houses are adequate, and no doubt their new owners love them, we think much better design outcomes could be achieved but unless new development is absolutely prohibited in locations where convenient public transport is not

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realistically available, provision of parking for private (electric) vehicles will always be required. Parking of vehicles on footpaths and verges is however, one of the major design and visual blights of many new residential developments.

People need choices in where and how they want to live. While many, including those with families, don't want to live in town/city apartments without gardens, there are others, including older people who are looking to downsize, who might be willing to live in such apartments if only someone was building the sort of homes that they are looking for at an affordable price.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

We would prefer to see new developments that have greater regard for sustainable living, presenting a lower carbon footprint, incorporating more green spaces with trees planted as part of the design rather than added as an afterthought, and in schemes which are far less car dependent.

17. Do you agree with our proposals for improving the production and use of design guides and codes?

In theory, and assuming design codes are the way forward, then we would support these proposals. However, the amount of time and effort that will need to be expended in their production should not be under-estimated. Obtaining community involvement cannot be taken for granted in what could be detailed and protracted work.

The introduction of design codes raises questions about how often they will be reviewed, how they will be enforced and what would happen if circumstances dictate a departure from the code? Also, we need to be wary of allowing design codes to be so prescriptive that they block any change for innovation and modernity.

Wakefield Council has adopted an Urban Design Framework and a Residential Design Guide but we still wait to see the impact these documents are having on new developments. It is not evident that the Residential Design Guide is being used by housebuilders.

Again, if design codes are introduced, how will new schemes be appraised objectively against such codes. It is to a rules-based approach or discretionary and in the hands of a local authority planning officer? What will the process be for rejecting schemes that are deemed to fall short of code requirements?

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 officer for design and place-making?

Having a design body that would help to raise the debate about good design and architecture, not to mention beauty, would be a positive step and one which we would support (whither CABE?). We would also support the idea that each local authority should have a chief officer for design and place-making (would this be in addition to or in lieu of a chief planning officer?). The proposal assumes that people

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with the necessary skills, background and aptitude can be found. If they can, then they must have the authority and resources to make a real impact.

We would like to think the new design body would be a permanent addition rather than a temporary establishment to oversee the transition to the new arrangements. Page | 14

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?

Yes. Government should always set an example and practise what it preaches. An appropriate increase in funding for both the volume of affordable housing as well as for design should be made available to Homes England.

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

Yes and no.

How will 'pattern books' avoid conformity and not merely replicate what volume housebuilders already do?

How do we ensure that 'beauty' is not located in the past with only traditional styles of architecture being included? Georgian house types are undeniably beautiful but is that all we ever want to see in the future?

Permitted development rights need to be very tightly defined. There are social media accounts that show what can happen when property owners are given a free hand – and it's far from pretty.

21. When new development happens in your area, what is your priority for what comes with it?

It is important for us that new development brings with it appropriate infrastructure and amenities. For residential development, this means, inter alia, easy access to local shops, public transport and green spaces. In other words, development is not just about erecting new buildings, it is about place-making.

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?

No comment.

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

No comment.

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?

The amount should be increased to provide more affordable housing.

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22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?

No comment.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?

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Yes. Every opportunity should be taken to secure a proportion of development value for the benefit of the community in which it is located.

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. Every opportunity should be taken to secure a proportion of development value for the benefit of the community in which it is located.

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?

No comment.

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?

No comment.

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?

No comment

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

No comment.

25(a). If yes, should an affordable housing 'ring-fence' be developed?

No comment.

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?

Yes. The move to a digital planning system must not disenfranchise those who are unable to use or access material presented in digital format. It should be possible for people to consult physical documents and to engage and comment by means other than digital alone.

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