

To: planningforthefuture@communities.gov.uk

Dear Sir/ Madam

Response to *Planning for the Future* consultation

The proposals set out by the Government in its recent *Planning for the Future* White Paper and *Changes to the current planning system* consultation paper would seriously undermine the delivery of sustainable development which meets the needs of Londoners, including the better use of previously developed brownfield land, and the protection of green space which has proved so vital in the current pandemic. A new report from CPRE, the countryside charity, shows that the current planning system is not even the problem. A slow build-out rate and market-led housing are causing the lack of affordable homes where people want to live, near transport links, amenities and services.

As a group that cares deeply about London's green spaces and sustainable urban development, Enfield RoadWatch is also very concerned about the wider planning reforms. As it stands, local communities will have a say about whether their area will become a 'Growth', 'Renewal' or 'Protected' zone. But, unlike under the current system, they would then have no say on the individual developments that take place in those zones or on their doorsteps resulting in an unacceptable loss of local democracy in the planning process. We believe that a strong, democratic planning system is an essential component of sustainable development, community cohesion and a healthy environment.

Enfield RoadWatch has the following key concerns with the proposals in the *Planning White Paper* and *Changes to the planning system* consultations:

- **Access to green spaces**
- **Brownfield first needs strengthening**
- **Loss of local democracy**
- **Housing affordability**

Access to green spaces

A vital purpose of the planning system is to contribute to protecting and enhancing our natural, built and historic environment. However, the government's proposals to introduce a zonal planning system offer no additional safeguards for areas earmarked for protection and would weaken protection of green space designated for growth or renewal. 'Protected' areas as defined by the new proposals will be those with site designations such as Green Belt, Areas of Outstanding Natural Beauty (AONBs) and Conservation Areas. However, Green Belt areas can still be de-designated during the Local Plan process, which is likely to happen given the high housing targets created by the new 'housing algorithm', and no consideration is given to the importance of undesignated green spaces near to where people live. Under the proposed zonal system, and in combination with the centralised, high housing targets, these undesignated green spaces will be under increased threat of becoming a free-for-all for development. The result of which will be the loss of the crucial functions that green spaces serve to local communities in terms of health and wellbeing, in addition to its role in mitigating the climate emergency.

Brownfield First

A new CPRE report shows that there is enough brownfield land for 1.3 million new homes and over half a million already have planning permission. The figures demonstrate that there is already enough available and suitable land in the planning system to meet the government's ambition to build 300,000 homes per year for the next 5 years (this Parliament), calling into question the controversial plans to deregulate the planning system. A true Brownfield First policy will deliver huge benefits by building the affordable homes in areas where communities want to live, providing access to better transport links and amenities and services they need.

Loss of local democracy

A crucial feature of the planning system is accountability and the opportunity for communities to feed into plans in their area. The Secretary of State has stressed that local democracy will not be lost in the new system. However, restricting community engagement to the Local Plan making stage will result in members of the public losing their ability to scrutinise individual planning applications. It also relies on the Local Authorities engaging fully and transparently with the public at the Local Plan stage, which is definitely not always the case. The proposed change will effectively cut local democracy in half. In contrast, developers will only need to successfully influence a local plan and will then have sweeping powers to build however and whenever they like on most sites.

The proposals also strip away the power of Local Authorities to respond to local needs and challenges. Local Plan policies must be sufficiently detailed and tailored to local circumstances, challenges and opportunities if we are to meet wider aspirations and objectives, such as on climate change, the natural environment, green space, local economy and affordable housing.

Housing affordability

The White Paper proposes a national approach to setting binding housing requirements. This approach, as well as the proposed new forecasting method, is too centralised and does not sufficiently take into account the needs or environmental constraints of local areas. It is also likely to make it more difficult for local authorities to acquire land to build affordable homes, as large developers and land agents will bid prices up for land that is more likely to be developed under the new system. Much more priority needs to be given to helping local authorities regenerate brownfield sites and build more affordable homes to meet local needs.

Developers on small-to-medium sites are currently required to build affordable homes if the site includes 10 units or more. The government proposes lifting this cap to 40-50 units. With this proposal expected to remain for a minimum of 18 months, this will leave many areas without the affordable housing needed for some time to come. The impact of this will be felt most acutely in the countryside and in particular small rural towns, where sites tend to be mostly in this small-to-medium bracket. This means fewer homes that people of lower incomes, including many key workers, can afford. This proposed short term change (in the *Changes to the current planning system* consultation) sits in direct contradiction to the longer-term reforms proposed in the *Planning for the Future* White Paper, which repeatedly calls for maintaining and improving the levels of affordable housing.

Enfield RoadWatch stands with CPRE, Friends of the Earth, Civic Voice, Ramblers and many other environmental and civic organisations and many MPs and local politicians in believing that the proposed planning changes are not fit for purpose and should be abandoned in their present form.

Sincerely

Ian D'Souza
Chair
Enfield RoadWatch