

## **Changes to the current planning system**

### **Consultation on changes to planning policy and regulations**

The Hitcham and Taplow Society submits the following comments. The Society has been in existence for some sixty years. It has a main objective to ensure that all development within the district is of the highest standard and preserves the quality of the environment. It represents a significant proportion of the residents of Taplow.

We choose to respond by email as the questionnaire, like all such questionnaires, is designed to only cover narrowly drawn topics.

#### **6. Page 8**

“Adopted Local Plans (LPs) provide 187,000 houses, not the 300,000 needed”.

This is fallacious – there have been so many recent revisions to planning frameworks law that there are now a large number of new LPs close to adoption that carry considerably higher housing numbers than the current (out-of-date) ones. Many are held back by Inspectors on Duty to Cooperate grounds (which is to be withdrawn under the future proposals). In reality the number actually catered for in LPs will shortly be very significantly higher.

#### **14. Page 10**

a.

Making the method more agile is a different way of stating that it is volatile, which is listed earlier as a defect of the current process.

d.

The 300,000 appears to be a purely political number, not arising from the data. This number is fed into the method as a requirement. This implies that the numbers produced are not based on the data and analysis, greatly reducing public acceptance of the ensuing results.

#### **16. Page 11**

Government aspirations are notoriously fickle. They are unlikely to lead to stability as claimed.

#### **22. Page 12**

“For example, where affordability improves, this will be reflected by lower need for housing being identified”

This is surely fallacious? If houses were actually cheaper than now, demand would rise. Removing the current cap we see as unacceptable – see broader comment that follows.

#### **43. Transition page 16**

The timescales suggested for Local Authority (LA) responses are absurd. The scale of changes foisted onto LAs by over-frequent tinkering with planning law in the last few years has placed high loads and stress on planning departments. These proposed changes are to be immediately followed by the radical changes outlined in the white paper, necessitating yet another set of LPs. LAs are presently under very severe pressures from the financial costs of the pandemic (at a time when government is withdrawing much of its financial support from LAs) and from consequent staffing problems. These plans will be overtaken by the new legislation, giving a period of several years of complete flux and uncertainty to LAs and citizens. This is not a format for a coherent and lasting development plan.

Removing the cap can make these deadlines quite unrealistic for an LA that thereby receives a high growth requirement. Finding the land for such a growth in these time frames could only be done by the LA taking arbitrary decisions not based on any realistic analysis and avoiding any form of democratic consent.

Current LPs are bound by the requirement of Duty to Cooperate. Being able to show this to the quality level being currently required by Inspectors for these great increases in house numbers again renders the time frames unrealistic.

### **Delivering First Homes page 19**

This plan is explicitly based on increasing home ownership. That is fine but we point out that it is not the answer to the principal housing shortage. It does nothing to relieve the gross shortage of accommodation at the lower income end, where people are never going to be able to afford to buy a house. There is nothing in the plan to enforce the building of truly affordable housing for rent (as opposed to modest price reductions on owner/occupied). The paragraphs dealing with “social rent” are inadequate to ensure any significant quantity being produced. Owning a house has classically been a desirable end but to truly accommodate our population requires a different focus than a developer-led owner/occupier housing boom. The government has been emphasising the need for radical economic growth following Brexit and the pandemic. This requires people to be readily mobile to respond to changing circumstances, best met by rented accommodation (at all income levels). We submit that the current strategy is dealing with an outdated concept of housing need led by large developers.

### **Missing Infrastructure**

The proposals are quite unrealistic in that there is not even a mention of the required infrastructure to support such growth. Government housing plans are always accompanied by some assertions about infrastructure but they are invariably meaningless. Housing plans and numbers are documented in fine detail with imposing metrics. In contrast, governments never produce a single metric for infrastructure. Housing development in the short term on the scale proposed will total swamp the environment with grossly overburdened local road networks and a complete lack of provision of supporting services – schools, clinics, leisure facilities, water supply, drainage etc. Large projects such as HS2 and Smart motorways do not address quality of life concerns for the everyday experience. It is irresponsible of government to proceed in this grossly unbalanced way. Growing capacity while maintain local quality of life can only be handled by careful incremental steps, not in the present knee-jerk approach.

### **Missing land availability**

The desktop calculations used to produce the growth numbers take no account of the ability of a Local Authority to find the required space. In particular our own area (SBDC within Bucks) is some 87% Green Belt and the growth number projection will be impossible to meet without further destruction of the Green Belt. This subject is completely avoided in the document and will bring the numbers into direct conflict with the governments’ published intent to protect the Green Belt (presumably after accepting the depredations arising in the latest round of Local Plans which have been justified as “exceptional circumstances”). Exceptional circumstances cannot be continually invoked.

### **Overall conclusion**

The proposals are flawed. There is much less of a gap than claimed between the desired 300,00 target and what in reality is to be expected from a large number of revised Local Plans already in development or inspection, greatly reducing the actual urgency for strong short-term actions. For example, our draft Local Plan for SBDC – currently in inspection – caters for 15,260 homes, whereas the current adopted LP caters for only 2100.

Imposition of these changes immediately prior to the sweeping changes proposed in the white paper places an enormous and largely unnecessary load on LA planning departments (and Neighbourhood Plan groups manned by volunteers). To expect LAs to be able to handle these changes and properly implement the new radical plan all within the life of this parliament (a timescale identified in the white paper) can only lead to chaos. Far better to concentrate all changes in the new radical plan to provide a clear and stable path for planners and developers that also carries a meaningful infrastructure policy. The proposals made here for housing growth have no democratic acceptance.

Roger Worthington, Secretary HTS  
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