

TELLING US NOT ASKING US

10 KEY POINTS FROM SAFE ON THE GOVERNMENT PLANNING WHITE PAPER

1. POWER FROM THE PEOPLE Local people's influence on planning and planning applications is essential, as they know their area better than anyone else. Currently they have a say:

- Elected local councillors drive planning issues on behalf of local people, knowing what it is like actually to live in an area in a way national politicians cannot.
- Councils' planning policies must meet government rules, and set out what housing is needed where. They then decide planning applications on their policies, with input from residents.
- Government appointed Inspectors check Council's local policies against government policy and decide Appeals. Local people can comment. Inspectors must give reasons for their decisions.
- Residents comment on policies and applications from their own perspective. It is up to Councils to translate those comments into planning decisions. For example, if enough residents prove it is already unsafe to walk down a busy street, Council policy should direct development elsewhere.

WHAT'S NEW – Real local influence will be much reduced:

- Most local planning decisions will be removed from local councillors and officers and with it, influence for local people.
- The national housing target will be distributed across local districts by government, with Councils only able to decide which zone goes where, not what housing is needed in their district.
- Land will be 'zoned', with automatic or 'presumed' planning permission in 2 of 3 zones, shutting out local people from a say in most planning decisions, only allowing comment on which zone is which.
- In approving Councils' zoning decisions, Inspectors will only have to say *whether* they agree or disagree with views from residents and Councils, not why.
- Residents' comments on zoning will only be accepted by Inspectors if they say not only *what* they disagree with but *how* it should be changed and *why*, (planning expertise that most of us do not have), with a limit on how many words they use to say it.

The reforms emphasise digital involvement and virtual reality in planning, to give the public a better idea of what a development will look like – but this is not much use if we cannot influence whether it is built or not, because of a national planning system giving us no say.

2. 'PROTECTION' THAT DOES NOT PROTECT – Councils now decide all planning applications. If they refuse an application the applicant may appeal to an Inspector appointed by government. The public can comment at both stages but have no right of appeal themselves.

WHAT'S NEW – The country will be zoned as *Growth, Renewal or Protected*, as defined by government. Councils will decide which areas fit which nationally defined zone, but very few individual applications:

- **In Growth areas**, outline planning permission is automatic, with only details to be decided by local planning officers under a reformed process, without involvement of local Councillors or local people.
- **In Renewal areas**, there will be a presumption in favour of development, including housing on '*small sites within or on the edge of villages*,' with Councils only apparently able to resist '*inappropriate development in gardens*'.
- **In Protected areas**, there will be '*more stringent development controls*.' '*Areas of significant flood risk*', conservation areas, and some open countryside will be protected. Even in 'Protected' zones, housing applications are possible. There is no detail on how local people can influence them.

If we are zoned 'Growth' or 'Renewal', we will be vulnerable to yet more housing, and the influence of local people and their elected councillors on the decisions will be gone. '*If an unanticipated opportunity arose*' in a Growth or Renewal area, housing outside local policy could be agreed. Permitted Development Rights will be extended in all zones, permitting more development without consent.

3. WIDENING THE REALITY GAP – Recent success on overdevelopment has happened when we have been able to offer our real life experience as residents, rather than leaving the Council to rely on 'modelling', incomplete data or lengthy reports bearing no relation to what it is like to actually live here. Although the Council listened, all evidence on road safety on New St (including from Suffolk County Council) was dismissed out of hand by the Inspector in the 2019 Post Mill Lane Appeal – the reality gap.

WHAT'S NEW - To anyone living in the village who has regularly seen excrement and flooding in the Low Rd it might seem that we have '*significant flood risk*.' However, the Environment Agency, Anglian Water and the Appeal Inspector do not agree and feel our flood risk should not be a bar to development. Strangely, the Council's Environmental Health department denies any role in preventing excrement in the streets. The inaction of these agencies shows why local power is so important - yet it will be reduced.

4. AN URBAN VIEW OF A RURAL PLACE – Our local knowledge as a rural community includes the village's 50 year history of sewer and surface water flooding, understood only by residents up until the last couple of years. Rural life means narrow roads with sharp bends following ancient field boundaries, and junctions one cannot see round, such as Jubilee Corner – yet more risky for cars and pedestrians with heavy farm traffic at harvest time - important local rural factors are unknown in urban areas.

WHAT'S NEW - The effect of the reforms is to downgrade to zero the value of local knowledge. This really matters because the new system seems to have been designed from an urban viewpoint. For example, '*gentle intensification*' (more houses that are closer together) is put forward as desirable – but it is very far from desirable in a rural village not least because of the loss of character. The additional traffic more housing brings to a rural area - not to mention to the strain on infrastructure (roads, sewers, schools and health services) - has a greater effect. We have only one sewer and one school as well as roads that cannot be made wider. 'Intensification' is more intense in a location such as ours that is distant from alternative infrastructure, unlike an urban area. Rural character is more fragile, but this is not recognised.

5. PAYING LIP SERVICE TO NEIGHBOURHOOD DEVELOPMENT PLANS– NDPs enable residents to plan for the future of their area, on housing (with figures for need provided by the Council), employment, heritage and environment. After consultation with residents a referendum, and 'examination' by an Inspector for compliance with Council and national policies, an NDP has legal force as part of Council policies.

WHAT'S NEW - NDPs are described in the government document as '*important*' yet their main role is to be on design codes: NDPs will decide what houses might look like, but not whether we need them at all nor where they should be built. Their status along with local policies seems to be facing downgrading.

6. PAYING LIP SERVICE TO HERITAGE - currently there are separate laws to protect conservation areas and listed buildings (of which we have 58 In our village), as well as their settings.

WHAT'S NEW – The reforms say that these laws will be changed, but not how. The document notes that even under the current system such areas can be '*enhanced by development*'.

7. MISSED OPPORTUNITY ON CLIMATE CHANGE – Existing government policy states that '*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*'

WHAT'S NEW – Although the document aims to ensure housing design minimises impact on climate change, it is silent on the impact on climate change of *where* houses are built. Housing in areas without jobs increases travel and carbon emissions, making the 2050 zero emissions target even harder to meet.

8. MISSED OPPORTUNITY ON THE LAND BANK - nationally permissions have been granted for one million homes that developers have not yet chosen to build - the developer 'land bank'. If these sites were developed this would significantly reduce the annual housing target of 375000 homes per year.

WHAT'S NEW – the issue is ignored. The housing crisis is not due to lack of planning permissions but to developers' failure to build on land they already own, exposing areas local people feel should not be developed to 'automatic' or 'presumed' planning approval, in which they will have little or no say.

9. A SHIFT OF POWER - the reforms will strengthen more powerful parts of the current system (developers, central government and the Inspectors) and weaken Councils, councillors and local people. To quote the Town & Country Planning Association, '*these reforms will afford power to the already privileged to pursue development in their own self interest, irrespective of whether this benefits the wider community.*' Just one example is the plan to reform the Community Infrastructure Levy (CIL), a levy developers now pay upfront, to fund infrastructure needed for new houses, such as schools. They must pay *before* houses sell, no matter how long that takes, and pay interest if they borrow to pay.

WHAT'S NEW - the levy will be calculated on the sold value (reflecting the higher land value of planning permission) but not be charged until new houses are occupied. Councils are expected to borrow against the levies they are expecting, to fund new infrastructure before residents move in, bearing the risk of developers going bankrupt. Smaller developments would be exempt, even if more than one apparently.

10. TELLING US NOT ASKING US – with 'automatic' or 'presumed' planning permission in 2 of 3 zones, it is disingenuous to claim that local people will be able to shape their areas. Mention is made of 'Protection' status being sidestepped, but not how residents can have a say. Objectives on house design are laudable, but are no substitute for local influence on whether they should be built at all. In a rural area, overdevelopment that overloads roads and services and overwhelms a historic setting such as ours, can easily and irrevocably destroy local character. Whether new houses look nice or not cannot prevent that.