



The
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charity

2020 Planning White Paper and other proposed changes to the planning system

Summary of the response from CPRE, the countryside charity

CPRE, the countryside charity, campaigns for a beautiful and thriving countryside that enriches all our lives. As well as the national charity, we have 60,000 members and supporters, a network of 43 county-based charities and more than 200 district-based groups across England. Our members and supporters, including around 1,600 parish councils, are actively involved in local planning issues relating to the communities and wider countryside where they live.

CPRE has had a long interest in the overall spatial pattern of development in England. We are particularly concerned about using land effectively for housing and other forms of new development so that we can have:

- Countryside for all: fair access and quality green space near where everyone lives, wherever they are in the country.
- Better, thriving places with more genuinely affordable new housing, buoyant town and village centres and set within walkable neighbourhoods and healthy, low-car environments.
- Connected space and landscapes for nature, wellbeing and for addressing the climate and biodiversity emergencies.

CPRE's headline concerns

1. Local democracy and accountability need to be strengthened

The government's Planning White Paper proposals will critically weaken the scope for public input, and need to be fundamentally reconsidered. The proposals aim to carve England up into three zones. Land in 'growth' zones would be given outline permission and local development orders drawn up by local authorities would replace planning applications for specific schemes in both growth and 'renewal' zones. Only in 'protected' zones would the existing system of planning applications for specific schemes remain. This would reduce hugely the scope for public involvement and accountability. It is not enough for the public to just be involved in the shaping of local plans: developers and local authorities need to be accountable to local communities at the scheme stage for delivering promised community benefits and well-designed new neighbourhoods. In any case a 30-month timescale for plan preparation is likely to be unrealistic and undeliverable, leading to continued problems with ad hoc development in unsuitable locations. A much stronger concept of 'sustainable development' needs to inform planning law and policy, including the proposed 'sustainability test', with clear links through to the Sustainable Development Goals.

The greatest obstacle to the government's aims of building 300,000 houses per year is the subsequent build out of properties with permission. The planning system is already fulfilling much and possibly all of the land requirement over the next 4-5 years at least. Of this land requirement at least 1.3 million homes can be built on available and suitable brownfield sites. Another major CPRE concern with the proposed zoning system is that it is not clear whether local authorities will be able to take a brownfield first approach (brownfield land would generally fall into a 'renewal' zone) over greenfield land in 'growth' zones which might be less



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sustainable in terms of transport links or environmental damage. The government should urgently implement the reforms recommended by [Sir Oliver Letwin](#) to increase building rates through more locally led development and a mix of housing types and tenures that better reflects local needs. The proposed moves to increasing transparency and available data on land holdings is a welcome but very small step in the direction of reform that is needed.

Public engagement in the system needs to build on recent improvements in the flow of information by more consistent use of machine readability and easily used search facilities. Citizen assemblies could also help improve the quality of input to planning consultations. The government also needs to widen the scope for, and increase the status given to, neighbourhood plans if it wants to continue to increase the take up of neighbourhood planning, a recent innovation which CPRE supports.

2. Many more genuinely affordable homes need to be built

Within its wider aspirations for housebuilding, the government should clearly commit to building 145,000 genuinely affordable houses a year. The proposed change to the threshold for delivering affordable housing from schemes of 10 units to 40 or 50, is a severely retrograde step in this regard which will have a major impact in many small and medium sized rural towns in particular. We are not reassured by government claims that it will only be temporary. Proposals for requiring First Homes in new developments are likely to be inappropriate for many rural areas with particular high gaps between average house prices and average wages.

The government's proposed new formula (often referred to as an algorithm) for calculating housing needs will massively increase pressure for building on open countryside in many rural areas, and will make the building of affordable homes and the regeneration of urban brownfield sites more difficult. It will also worsen the current economic disparity between the north and south in England.

The government's proposed Infrastructure Levy is in our view unlikely to deliver an increase in genuinely affordable homes, as local authorities will generally see the provision of other infrastructure as having greater priority. More radical reforms are needed on capturing land value, so that more genuinely affordable homes can be provided.

3. We urgently need better use of land to tackle the climate and biodiversity emergencies

We welcome many of the White Paper proposals on design, in particular the proposed new unit in government to promote design quality. For the proposals to be effective the government needs to do further work to uphold good design through necessary benchmarks (particularly for energy efficiency, internal space standards, and walking and cycling access) and enforcement (through design codes that can be upheld through planning enforcement powers). Ambitious benchmarks for new development, properly enforced, will in turn enable a target for net zero in new housing to be reached in 5-10 years rather than by 2050 as the White Paper proposes.

Government planning policy and supporting financial programmes, such as the New Homes Bonus, should set clear objectives of helping level up development between north and south, a major increase in the delivery of genuinely affordable homes, and regenerating suitable brownfield land. Within this, housing requirements should be agreed through a strategic, larger than local planning process led by local



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authorities. The process should be informed by greater sensitivity to local constraints, such as valued green spaces and landscapes.

The government needs to more clearly link its programme of changes to planning to link with its 25 Year Environment Plan and measures in the Environment Bill for nature recovery areas and biodiversity net gain. The proposals for 'protected' zones do not address the weakness of the current planning system in managing our precious countryside. In particular, current policies on Areas of Outstanding Natural Beauty (AONBs) and Green Belts urgently need strengthening, as do links between the planning system and good land management in the countryside as a whole.

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