**To:** Planning Policy Consultation Team 

Dept of Communities and Local Government

Swindon SW1P 4DF

PlanningPolicyConsultation@communities.gsi.gov.uk

Dear Planning Policy Consultation Team,

I fully endorse the response submitted by the Longdendale Community Group, which is quoted in full as follows.

Yours sincerely

**[replace with your name, address and postcode here]**

**Response to Housing White Paper Consultation from Longdendale Community Group.**

**Introduction**

The following account is the response of the Longdendale Community Group to the Housing White Paper consultation, “Fixing Our Broken Housing Market,” presented to Parliament February 2017. Our response is in two Sections. The first Section comprises responses to the set questions of the consultation. The White Paper raised a number of important issues relevant to communities and of concern to us, but which were not raised in the set questions. Therefore in the second Section we submit our responses to these additional issues, since, to reiterate, these issues were raised in the body of the White Paper text. We sought as far as possible to incorporate these issues into our responses to the set questions, but this was extremely difficult, given the specific scope of those set questions. It would be unfortunate if the DCLG were to discount any aspects of our responses to the set questions on the basis that the set questions were not inviting comment beyond their scope, but should this be the case, the second section should be read with equal weight, and in which we should be free to raise these points. Finally we submit our conclusion based on an overall analysis of the White Paper.

**Note**

DCLG Question quotations are in bold black italics. LCG responses are not bold, but highlight points are in blue, with bold blue for special importance.

**Abbreviations:**

DCLG: Department of Communities and Local Government

LA: Local Authority

LCG: Longdendale Community Group.

**SECTION 1: RESPONSES TO SET QUESTIONS**

**Question 1**

***Do you agree with the proposals to:***

***c) Revise the National Planning Policy Framework to tighten the definition of what evidence is required to support a ‘sound’ plan?***

LCG response: We agree. The test of soundness of a Plan is an important one to appeal to. If an aspect of a Plan is not sound, it should be rejected. However, we ask: how can a test for soundness be defined so that there is clarity for developers, planners and the local community?

**Question 3**

***Do you agree with the proposals to:***

***b) from early 2018, use a standardised approach to assessing housing requirements as the baseline for five year housing supply calculations and monitoring housing delivery, in the absence of an up-to-date plan?***

LCG response: We agree. - The following considerations regarding terminology and subsequent new approaches suggested should be taken to “assessment”, which should be standardised.

We advocate:

i. Housing Need Assessment Panels, representing equally both development and control interests.

For “best estimate assessment” independent panels drawn from all sides of development control should be formed. They could and should include equally persons from the environmental lobby, community groups, and the public and private housing sector. Their aim would be to reach consensus led by a publicly paid independent chair.

This could reasonably be seen as “objectively” finding a reasonable middle ground between the current obsession with over safeguarding against “under- delivery”, and the completely equal threat of “over- delivery.” This would ensure the government planning system only worked in the best public interest and not for vested interests.

ii. Commonly Agreed Need Assessment Methodology by Representative Panel.

The first task of such a panel, representing all sectors involved in housing, would be to establish a common methodology that is seeking to be objective as possible about future projections to arrive at Best Estimate Need. The current assessment system is random and selective as to evidence, so cannot be genuinely externally verified against a national standard. **It seems to have been generally performed by those who would benefit by an inflation of housing need.** With equal representation from community groups, the two main housing sector providers and environmental NGOs we might hope to see less selective evidence and an end result which could be audited, which is very difficult if the method is arbitrary as at present.

**Question 5**

***Do you agree that regulations should be amended so that all local planning authorities are able to dispose of land with the benefit of planning consent which they have granted to themselves?***

LCG response: We disagree regarding making available “surplus public land.” There is a nation-wide trend for public land (and the assets on them) and land bequeathed to the community being sold off, which are community assets. Their status as community assets should be preserved, particularly when the community values them as such.

**Question 10**

***Do you agree with the proposals to amend the National Planning Policy Framework to make clear that:***

***a) authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?***

**LCG response: We disagree – introducing such a test would lead to repeated legal challenges to the Green Belt, and would in fact effectively invite these. This would “lower the bar” on Green Belt which the White Paper explicitly states it does not want to allow.**

**The current NPPF text is sufficiently explicit that the Green Belt designation is effectively off limits, and that reviews can only be very seldom, few and far between in “exceptional circumstances”.**

**Also retain existing text to ensure it is understood that permanence as a restraint on urban sprawl is the defining aspect of this unique feature, and its loss cannot really be compensated for.**

***b) where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality or accessibility of remaining Green Belt land?***

***c) appropriate facilities for existing cemeteries should not to be regarded as ‘inappropriate development’ in the Green Belt?***

***d) development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt?***

***e) where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan (or plans) for the area in question?***

***f) when carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs?***

LCG Response to b-f above: We disagree. We re-emphasize that **the current NPPF text is sufficiently explicit that the Green Belt designation is effectively off limits; permanence as a restraint on urban sprawl is the defining aspect of Green Belt, and any net loss could never be acceptable.** Once lost, it can never be replaced, and impacts are not likely to be offset.**If anything, the phrase “exceptional circumstances” needs clarification. We do not consider that “housing need” constitutes an “exceptional circumstance.”**

**Question 12**

***Do you agree with the proposals to amend the National Planning Policy Framework to:***

***c) emphasise the importance of early preapplication discussions between applicants, authorities and the local community about design and the types of homes to be provided?***

LCG Response: We agree. However, this question needs to greatly widen in scope. The White Paper gives considerable space to acknowledging the importance of the community. For instance, ***Introduction page 13: Quite reasonably, people often have concerns about the impact new housing will have on their community. That is why it is so important that people have a say over where new homes go and what they look like through the planning process;* Page 18:..... local communities decide where development should go; *Page 29. (1.41): ....we want communities to have a more direct say over development in their area..... (1.42): requiring local planning authorities to set out how they will help neighbourhood planning groups and involve communities in their wider plan-making activity..... (1.44): We want to ensure that communities can influence the design of what gets built in their area..... Local people want new developments to reflect their views about how their communities should evolve.... Good design is also fundamental to creating healthy and attractive places where people genuinely want to live.... too often local people hear about schemes late in the day, after a planning application has been submitted..... Inadequate community involvement and insufficient certainty can fuel objections, authorities and the local community.....***

In relation to this the 2016 consultation regarding the Greater Manchester Spatial Framework (GMSF) is a case in point. The community was **not invited to** beinvolved in the GMSF development process, nor the development of the Local Plans related to it.

The only invitation appears to have been to developers and land-owners. This betrays the motivation behind the Plan being developer-driven, rather than community-driven. There were over 500 objections from Longdendale to the 2013-4 consultation, including virtually entire streets of residents objecting, and including the majority of the population of Mottram. In spite of this, the plans were carried forward. Neither was the local community nor community groups consulted before the draft plans were published. The draft plans contained proposals to decommission large swathes of greenbelt and a playing field, whilst making no recourse to utilizing brown belt first, in spite of its availability in the locality. Neither did the local authority make adequate provision to publicise the consultation, with the overwhelming majority of residents being informed via this community group. In spite of our recommendation to the local authority to subsequently inform the community via their council tax bill, this was not taken up, and so at the next consultation the same dire process was repeated, with informing the public left mainly to community groups. More importantly, instead of planners and Councillors integrating the community’s responses, it appears that the community’s responses have simply been binned, because the developer-led plans were carried forward, and extended, with yet more development on greenbelt incorporated into the Plan. Thus, in spite of the community objections, no changes were made to the actual plans.

Similarly, when the LA in partnership with a Housing Association issued a consultation (for a district centre, in Hattersley (South), the consultation was highly selective, reaching only social housing residents, and very short in duration, so that the majority of the village (living in non-social housing), even was excluded from the consultation. Our community group conducted its own consultation, inviting the village to say how they would like the green space to be used, and the results were published in the local press. However, these results were completely ignored by the LA.

However, the White Paper consultation questions focus on only limited aspects of community issues, precluding dialogue on the wider issues raised in the body of the White Paper text. The questions that are posed appear aimed to strengthen the planning process in favour of developers, at the expense of community opinion. If the community really does have the high priority that the above quotes indicate, there could be alternative, more creative strategies to fulfil these objectives. If you are to take the nation with you in this, we welcome further subsequent dialogue with you on these points. As it is, these points do look suspiciously as if they are intended to weaken the very process of community involvement which you are claiming to support. The reason for this becomes evident in the following point.

***d) makes clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in statutory plans?***

LCG response: We disagree. This could lead to the “good design” parameter exploited to advance a development that is not in the community’s best interests, such as yet another supermarket, when one exists already in close proximity.

You state on Page 29. (1.41):

***“....we want communities to have a more direct say over development in their area..... “***

However, again in your questions it is evident that opportunity to engage with us on this point is absent. Question 12 should be greatly expanded (or additional questions added) to ask how we would like our community to have a more direct say over development in their area.

If this is a genuine objective of the White Paper, much more should be included as to how this can be achieved. We suggest, for instance, a broadening of the consultation questions to include the following issues:

**i. Financial support for community responses**, because we rely entirely on volunteers and fund-raising (often having to raise hundreds of pounds to produce communications) in order to respond to paid full-time employees. This money should NOT go into the financial allowances scheme, but be exclusively for use of volunteers not receiving expenses, within identifiable community groups with sufficient impact in representing the community voice (in contrast with, say, Town Councils).

In our experience, many legitimate objections to plans could be designated as “design objections”.

**ii. More realistic, sufficient timescales for community response to planning applications.** When a planning application is made public for consultation, there is typically only one month given for representations to be made. This is already woefully insufficient time for a community response, particularly for large developments. It needs to be realized that the community groups are comprised of volunteers, many of whom are engaged in full-time employment. To have to research the documents, write a response, publish and circulate it to the community, in order to inform them, and then for affected residents in the community to respond, all takes considerable time.

We advocate instead advance notification of plans before the one-month consultation period, or, alternatively, for the consultation period itself to be lengthened to two months, or, on the case of large developments such as superstores, a minimum of three months.

**iii. Planning conditions should be maintained (rather than eroded).** These are written in as necessary safeguards, often for the benefit of the community, and should be implemented. It is up to the developer to do this, and so the developer should be fully compliant with this.

This refers to Page 18: Supporting developers to build out more quickly by tackling unnecessary delays caused by planning conditions. We ask, how do you intend to support developers in this respect? Already, planning conditions are not fulfilled, and the LA turn a blind eye to ensuring their implementation. Big companies are not fulfilling their contract for the proportion of social housing, and instead giving a financial settlement for LA to do this. LAs, already being financially squeezed, use this money to balance their books rather than build the needed social housing.

**iv. Compulsory purchase** Similarly, the White Paper consultation questions give no opportunity for dialogue regarding compulsory purchase, viz. ***Page 38 (2.18): We need to work with mayors and local leaders, taking a place-based approach, to better empower them to drive delivery of homes.***

LCG response: We disagree with the statement on page 38 stated above if this means mayors and leaders using their power to push through developments which are not welcomed by the community nor are not in their best interests, through developments that erode our Green spaces. This may include the heartless application of such power to compulsory purchase our homes. However, we do welcome leaders who will use their power with humanity or stop greenbelt grabbing developments.

***Page 42 (2.43). Compulsory purchase law gives local authorities extensive powers to assemble land for development. Through the Housing and Planning Act 2016 and the Neighbourhood Planning Bill currently in Parliament we are reforming compulsory purchase to make the process clearer, fairer, and faster, while retaining proper protections for landowners. Local planning authorities should now think about how they can use these powers to promote development.***

LCG response: We disagree. These two sides of the coin are mutually incompatible. It is difficult to envisage how proper protection for landowners can truly be retained, while the compulsory purchase power is to be used to encourage development. This is an issue of grave concern to many residents, and they are right to be worried. Residents should not be driven from their homes to make way for new homes: this seems incongruous and too high a community price to pay. The stress that this incurs can be so great as to increase the mortality rate, as has happened locally, in which the mortality rate increased by 12 people above the average rate in an area of social housing that was cleared to make way for retail development. There should be particular sensitivity and care towards elderly residents in this respect, since stress is less well managed in the elderly, and is an important morbidity factor. The document needs to spell out clearly what are “proper protections for landowners” – or we will be in a situation where “exceptional circumstances” incorporates “housing need” and there is no protection against CPOs.

***2.45: In addition, the Homes and Communities Agency (HCA), will take a more proactive role on compulsory purchase, by working closely with local authorities, and other parties where appropriate, to use their compulsory purchase powers to support the development and regeneration of land for housing.... (2.46): We will keep compulsory purchase under review and welcome any representations for how it can be reformed further to support development***.

LCG response: We disagree. See our response to the previous point (Page 42: 2.43). This strategy makes an increasing number of residents’ homes and their land vulnerable, creating insecurity and stress. Whilst you “welcome any representations”, what is really needed is dialogue and engagement with responses. Will this be a two-way process, or will representations merely be acknowledged and then filed away?

***v.* Habitat protection and protected species.** Similarly, the White Paper consultation questions give no opportunity for dialogue regarding “***Page 39 (2.25): a range of factors may cause delays to development. These might include ..... the need to protect species like great crested newts.”***

LCG response: Technology now exists to test ponds for the DNA of the great crested newts, identifying areas where they are most prevalent and should be protected. According to Alan Law, Natural England’s chief strategy and reform officer, “Development will be guided away from these areas towards more suitable sites,” to leave the newts undisturbed. This is directly relevant within Godley Green (green belt specified in the GMSF), in which a colony of Great crested newts, were formerly relocated from a school building plot toponds within and/or near Godley Green. Subsequent to this relocation, the colony will have undergone dispersal throughout the habitat. **Reallocation of a species to a new habitat incurs an extinction debt.** This means that a subsequent relocation event would endanger the colony more than if it had not incurred a previous history of relocation. It is therefore unthinkable that the environmental stress of a further relocation should be applied to this colony because of housing development within the habitat.

The White Paper continues, ***Page 40: A strategic approach to the habitat management of protected species (2.27) House-builders have identified the licensing system for protected species such as great crested newts as a significant impediment to timely housing delivery. Natural England and Woking Borough Council have piloted a new strategic approach which streamlines the licensing system for managing great crested newts – the species which particularly affects development. The Government will roll out this approach to help other local authorities speed up the delivery of housing and other development.***

LCG response: In view of our response to it ***Page 39 (2.25)*** it will be interesting to demonstrate how in practice this can be achieved. Although the White Paper refers to “Strategic Licensing for the great crested newts pilot at Woking,” it would also be useful for the White Paper to add the comment given by Alan Law, Natural England’s chief strategy and reform officer, which we reiterate: “Development will be guided away from these areas towards more suitable sites,” to leave the newts undisturbed. Thus this strategy ought to be made more explicit in the White Paper. At the least, further clarification is needed to establish what the strategies comprise.

We also note the absence of any reference to habitat management of any other protected species, such as bats. These protections are there for a reason (namely that the habitat and/or species within it are under threat of extinction) and should not be compromised. Therefore the White Paper should not in any way diminish the importance of this issue, as could be inferred by its ***absence from the text.*** What does the Government have to say to developers who want to sweep away protections for great crested newts and other endangered species?

**Question 13**

***Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:***

***b) address the particular scope for higher density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?;***

LCG response: We agree. We would add that developments should be **preferentially** promoted in locations well served by public transport (such as around many railway stations) **in explicit contrast to those reliant on motorway junctions** that promote long-distance commuting.

***c) ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?***

LCG response: We agree. Local services should not be limited to developments with housing served merely by one big supermarket (as is increasingly the case), but with small shops and recreational facilities, which together promote much greater community health, integration and well-being.

Failure to address infrastructure issues is a long-term major problem in our area. The Local Authority approves housing plans but fails to include infrastructure relief, and rather than allowing for the additional traffic created by the development to be eased in and accommodated, it instead compounds an already severe congestion problem. For many years, this network has a reputation for being congested and overloaded, with increasing pollution from vehicle emissions and adverse health effects – yet more and more houses are being built. However, modelling infrastructure (such as road development) needs to factor in the increased load on infrastructure that additional housing will bring, if the new infrastructure is to meet the demand. For instance, the Trans-Pennine Upgrade Programme, notably at Mottram-in-Longdendale, is deemed necessary by Highways England to alleviate the critically overloaded transport infrastructure in that locality. However, although the Programme may enhance the transport infrastructure (and therefore improve the traffic flow rate), there should be an embargo on building on the Green Belt there (as is planned in the GMSF), because the **additional housing will place pressure on the transport infrastructure and overload it again**, especially as the proposed housing development is beside a motorway junction. The transpennine upgrade programme itself will involve building more structures on greenbelt land. New roads mean that biodiversity corridors such as hedgerows will be destroyed, which has many repercussions ecologically (habitat fragmentation). To compound this with new housebuilding is a death sentence for Longdendale wildlife.

Provision of sewerage treatment and drainage for large-scale additional housing needs to haverealistic expectations, and modelling needs to accurately accommodate for flood water drainage. For instance, regarding London’s antiquated Victorian sewerage system, with its associated overload problems during high rainfall (necessitating sewage dumping into the Thames), this remains a pipedream, so to speak. This antiquated system still remains in place, and £billion investment is not remediating it but merely moving the problem further downstream. Thus further housing in this catchment area will inevitably lead to yet further overload of this system. Similar problems could occur in other regions of the country, in which the main drainage system is not designed to accommodate large additional housing developments, particularly during flood conditions. Redesigning such drainage systems should be factored into developers’ planning conditions, and the developer should pay to circumvent flood-related drainage overload, since such overloading can lead to houses submerged in floodwaters.

A similar set of measures is needed for the road and rail infrastructure.

***Question 17***

***In taking forward the protection for neighbourhood plans as set out in the Written Ministerial Statement of 12 December 2016 into the revised NPPF, do you agree that it should include the following amendments:***

***a) a requirement for the neighbourhood plan to meet its share of local housing need?***

LCG response: We disagree. Clarification is needed regarding “meet its share of local housing need.” If this means a share from outside its area, which would lead to loss of Green Belt and pressure on infrastructure within the area, this should not be imposed merely to meet your targets at all costs.

**Questions 28 and 29 (not quoted here)**

LCG response: We disagree. The housing delivery test could be a draconian measure, especially if based on inflated housing need estimates, to impose housing delivery irrespective of infrastructure constraints, and force Green Belt to be decommissioned because the LA sees no viable alternative.

**Question 34**

***Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18-219 of the National Planning Policy Framework, together constitute the Government’s view of what sustainable development means for the planning system in England?***

LCG response: We agree, provided that it allows us to use evidences of poor infrastructure as arguments of unsustainable development- otherwise it makes matters worse. If this infrastructure (especially the road transport network) is already fragile and over-capacity, there should be an embargo on further housing development in that locality. Merely improving the transport infrastructure with a view to subsequent housing development runs the risk of the transport system again becoming over-capacity. This is the problem of urban sprawl, which Longdendale has been struggling with for years.

**Question 36**

***Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?***

LCG Response: We agree.

**Question 37**

***Do you agree with the proposal to amend national policy to emphasise that planning policies and decisions should take account of existing businesses when locating new development nearby and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development?***

LCG Response: We disagree with the question. It is difficult to demonstrate how mitigation can work in practice. If, for instance, a superstore wants night-time deliveries within a residential area, how could the night-time noise from freight traffic movements to and from the store be mitigated? How can air-pollution from trunk roads be mitigated if the roads pass through residential areas? To get us out of these problems, there needs to be a long-term strategy to keep industrial areas separate from residential areas, and to develop transport infrastructure that by-passes residential areas.

**SECTION 2:** **RESPONSES TO OTHER ISSUES RAISED IN WHITE PAPER**

**In addition to our responses to the questions posed, there are a number of issues of concern to us which your questions gave no opportunity to address. These are as follows.** As above, White Paper quotations are in black bold italics.

***Re introduction, Page 9. WP: The housing market in this country is broken, and the cause is very simple: for too long, we haven’t built enough homes.***

LCG response: The cause is not so simple. It is well-documented that nationwide a large number of properties have been bought up by foreign investors. Many of these properties remain unoccupied, and are utilized only for the benefit of the foreigners’+/corporate investment. Whilst this might appear to be attractive for encouraging inward investment into Britain, it has contributed to both the housing shortage and house price inflation. Increased stamp duty on second homes, tiered to a higher level for foreign investors, might improve the situation. Better still, there could be an embargo on foreign investor house ownership until the housing shortage is remedied.

Also relevant is the large number of homes that are long-term vacant.

***Introduction, Page 10: The Council of Mortgage Lenders predicts that by 2020 only a quarter of 30-year-olds will own their own home. In contrast, more than half the generation currently approaching retirement were homeowners by their 30th birthday.***

Our previous comment (foreign inward investment.... contributed to both the housing shortage and house price inflation) again is relevant to this, as are our suggested solutions.

***Page 13: If there isn’t a robust local plan.... there is also concern that it may be in the interest of speculators and developers to snap up land for housing.***

LCG response: We disagree. **Local Plans should not be an excuse to design a Developers’ Charter. The greenbelt is already protected by the National Planning Framework, and the Housing White Paper should make no change to this protection**. If greenbelt remains fully protected, developers would not have any opportunity to “snap it up.” The robust local plans should not be used as an opportunity for developers to state their interest in land which landowners are willing to sell. Greenbelt is there for a purpose: to prevent urban sprawl and give relief and recreation to residents.

***Page 13: And we will increase transparency around land ownership, so it is clear where land is available for housing and where individuals or organisations are buying land suitable for housing but not building on it. This will put communities back in charge of getting the attractive homes they want and need.***

LCG response: Although we agree that speculative landholding is a block to the release of land of potential for housing (especially on brown-field sites), the above “transparency” could (by virtue of advertising greenbelt available to developers) also lead to more greenbelt being decommissioned and made available to development. Communities also need to be put back in charge of having their greenbelt and treasured green spaces (such as parks and playing fields) protected.

***Page 14: no existing community will welcome new housing if it places further strain on already stretched local resources.***

LCG response: We agree**. If this infrastructure (especially the road transport network) is already fragile and over-capacity, there should be an embargo on further housing development in that locality. Merely improving the transport infrastructure with a view to subsequent housing development runs the risk of the transport system again becoming over-capacity.** This is the problem of urban sprawl, which Longdendale has been struggling for years.

***Page 14: [Local authorities] will have nowhere to hide from this government if they fail to plan and deliver the homes this country needs.***

LCG response: We disagree. LAs should not be forced to build homes according to national population predictions (which affect housing requirements) which have been challenged and are, at best, controversial. Infrastructure enhancement needs to be addressed alongside housing in any planning process.

***Page 17: For local communities, the Government is offering a simpler and clearer planning process that makes it easier for them to get involved and shape plans for their area.***

LCG: We agree. We welcome a process that makes it easier for us to get involved and shape plans for our area. However, we reiterate the Localism Act, which emphasizes the need to involve communities early on in the process, and for Greenbelt and green spaces to remain protected, so that planning applications are not allowed to contest this.

**Page 18 - Step 1: Planning for the right homes in the right places.... Making sure every part of the country has an up-to-date, sufficiently ambitious plan so that local communities decide where development should go.**

LCG: Agree and Disagree: We agree that local communities should decide where development should go. However, if “ambitious” equates with decommissioning of greenbelt and green spaces, we disagree.

***Page 18: Simplifying plan-making and making it more transparent, so it’s easier for communities to produce plans.***

LCG: We agree. We particularly welcome you advocating communities producing plans.

***Page 18: Making more land available for homes in the right places, by maximising the contribution from brownfield and surplus public land.***

LCG: We agree and disagree. We agree with “maximising the contribution from brownfield.” However, we disagree regarding making available “surplus public land.” There is a nation-wide trend for public land (and the assets on them) being sold off, which are community assets. Their status as community assets should be preserved, particularly when the community values them as such.

***Page 18. Step 2: Building homes faster - improving the speed and quality with which planning cases are handled, while deterring unnecessary appeals.***

LCG: We disagree. When a planning application is made public for consultation, there is typically only one month given for representations to be made. This is already woefully insufficient time for a community response, particularly for large developments. It needs to be realized that the community groups are comprised of volunteers, many of whom are engaged in full-time employment. To have to research the documents, write a response, publish and circulate it to the community, in order to inform them, and then for affected residents in the community to respond, all takes considerable time.

We advocate instead advance notification of plans before the one-month consultation period, or, alternatively, for the consultation period itself to be lengthened to two months, or, on the case of large developments such as superstores, a minimum of three months.

***Page 18: Supporting developers to build out more quickly by tackling unnecessary delays caused by planning conditions.***

LCG response. We disagree. Planning conditions are written in as necessary safeguards, and should be implemented. It is up to the developer to do this, and so the developer should be fully compliant with this.

***Page 18: Taking steps to address skills shortages by growing the construction workforce.***

LCG response. We agree.

***Page 19: Improving neighbourhoods by continuing to crack down on empty homes, and supporting areas most affected by second homes;***

LCG response: We agree (see our comment and our suggestions re Introduction page 9). It will be interesting for you to demonstrate how in practice this can be achieved.

***Page 21: maximising the contribution from brownfield and surplus public land, regenerating estates,.... maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements;***

LCG response: We have already commented on this. We especially re-emphasize that **the current NPPF text is sufficiently explicit that the Green Belt designation is effectively off limits; permanence as a restraint on urban sprawl is the defining aspect of Green Belt, and any net loss could never be acceptable.     If anything, the phrase “exceptional circumstances” needs clarification. We do not consider that “housing need” constitutes an “exceptional circumstance”, yet this is implicit in the way the GMSP has been developed.**

***Page 22. (1.6). Authorities that fail to ensure an up-to-date plan is in place are failing their communities, by not recognising the homes and other facilities that local people need, and relying on ad hoc, speculative development that may not make the most of their area’s potential.***

LCG response: **We disagree if this means production of a developer-led Plan. The robust local plans should not be used as an opportunity for developers to state their interest in land which landowners are willing to sell** (see our response to Page 13). **We would agree if the Plan were more community-driven, and this needs aim needs to be overtly** **expressed**. The plan must take infrastructure issues into account. Delivering houses cannot be separated from the need for infrastructure enhancements.

***Page 25 (1.25): We will amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes.***

LCG response: We agree.

***Page 25. More homes on public sector land (1.26): We have a particular responsibility to make the most of surplus land which is already in public ownership. The Government has an ambition to release surplus public land.....***

***And 1.27 In addition, we propose to ensure all authorities can dispose of land with the benefit of planning permission which they have granted to themselves***

LCG response: We disagree with both statements above. There is a nation-wide trend for public land (and the assets on them) being sold off, which are community assets. Their status as community assets should be preserved, particularly when the community values them as such.

***Page 25: 1.29 Policies in plans should allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector.***

LCG response: We agree. It will be interesting to see how this is to be facilitated, given our LA’s fixation on cultivating large supermarket retailers and fast food outlets.

***Page 26: We will ensure councils can continue to protect valued areas of open space and the character of residential neighbourhoods, and stop unwanted garden grabbing.***

LCG response: We agree. It will be interesting to see how this is to be facilitated.

***Page 29. Green Belt land***

LCG response: [We have responded to this primarily via question 10.

***Page 29. Green Belt land***

***(1.39): where land is removed from the Green Belt, local policies should require the impact to be offset.***

LCG response: We disagree with the removal of Green Belt under any circumstances. Its loss cannot really be compensated for. Any “net loss” could never be **acceptable because the consequence is urban sprawl.  Once lost, it can never be replaced, and impacts are not likely to be offset.**

***Page 29. (1.41): ....we want communities to have a more direct say over development in their area..... (1.42): requiring local planning authorities to set out how they will help neighbourhood planning groups and involve communities in their wider plan-making activity..... (1.44): We want to ensure that communities can influence the design of what gets built in their area..... Local people want new developments to reflect their views about how their communities should evolve.... Good design is also fundamental to creating healthy and attractive places where people genuinely want to live.... too often local people hear about schemes late in the day, after a planning application has been submitted..... Inadequate community involvement and insufficient certainty can fuel objections..... (1.46): strengthen the importance of early preapplication discussions between applicants, authorities and the local community.....***

LCG response: We agree. We have responded to this point via question 12, but that question was limited in scope so we are repeating our response here. The motives for these laudable objectives should be transparent and honest, rather than using them as an opportunity to strengthen the planning process in favour of developers, at the expense of community opinion. If the community really does have the high priority that the above quotes indicate, there could be alternative, more creative strategies to fulfil these objectives. If you are to take the nation with you in this, we welcome further subsequent dialogue with you on these points. As it is, these points do look suspiciously as if they are intended to weaken the very process of community involvement which you are claiming to support.

***Page 57: .....Government will help people now, tackling some of the impacts of the housing shortage on ordinary households and communities. We will:***

***• continue to support people to buy their own home – through Help to Buy and Starter Homes; • help households who are priced out of the market to afford a decent home that is right for them through our investment in the Affordable Homes Programme; • make renting fairer for tenants; • take action to promote transparency and fairness for the growing number of leaseholders; • improve neighbourhoods by continuing to crack down on empty homes, and support areas most affected by second homes; • encourage the development of housing that meets the needs of our future population; • help the most vulnerable who need support with their housing, developing a sustainable and workable approach to funding supported housing in the future; and • do more to prevent homelessness by supporting households at risk before they reach crisis point as well as reducing rough sleeping.***

LCG response. We agree, and welcome the proposals in this chapter. However, regarding housing that meets the needs of our future population**, this should be based on post-brexit population predictions, and the estimates should be realistic, and not inflated.**

**This means also that decisions about declassifying Green Belt land should not be made using 20-year forecasts.**

***Page 64: This conversation will generate a range of ideas for incentives and other innovations for the Government to consider ......supporting custom build for older people; looking at how community living could work; as well as innovative models of housing with support available. These will sit alongside the Government commitments to fund and develop supported housing, including sheltered, step down and extra care housing***.

LCG response: We welcome your exploration of these ideas.

***Page 64 (4.46): At the Spending Review, the Government committed £400 million for a further 8,000 supported housing units.***

LCG response: We agree.

***Page 64 (4.50) Preventing homelessness: the Government is supporting Bob Blackman MP’s Homelessness Reduction Bill which will significantly reform England’s homelessness legislation, placing a duty on local authorities to take steps to prevent the homelessness of anyone eligible and threatened with homelessness. (4.51): Since 2010, we have invested more than £500 million which has helped prevent or relieve over a million cases of homelessness.85 In October 2016, we launched a new £40 million programme to drive a shift to homelessness prevention – intervening earlier to prevent homelessness happening in the first place, acting quickly when it does, and helping those rough sleepers with the most complex needs. Page 65 (4.53): We want to prevent people reaching crisis point, and for those who are already homeless to be able to move out of temporary accommodation or hostels to a settled home as quickly as possible. We will explore new models to support those that are the hardest to help.***

LCG response: We welcome these initiatives.

**CONCLUSION**

If the Government is sincere in fixing the broken housing market, the DCLG should have a transparent and honest methodology. The current Housing White Paper starts well by making numerous appeals to the importance of the community (for instance, the document refers to the “***impact new housing will have on their community. That is why it is so important that people have a say over where new homes go and what they look like through the planning process”..... “For local communities, the Government is offering a simpler and clearer planning process that makes it easier for them to get involved and shape plans for their area.”***

However, the consultation questions express a very different emphasis, in which they raise hardly any of the points of concern to communities that they acknowledge in the text (such as in the above quotes). Indeed, the very word “communities” appears only twice in total among a total of 37 questions, and both of these questions are very restricted in their scope compared with the wider objective to allow the community to have any genuine influence “***over where new homes go”.....and to “make it easier for them to get involved and shape plans for their area.”***

As a result, what is clear is that the White Paper is designed to steer readers by virtue of the questions it asks. Indeed we feel that this White Paper has the appearance of a Developers’ “Charter.” It should have been entitled as such, rather than masquerading as a document that recognizes the importance of the community voice in shaping plans. This White Paper as it stands is likely to generate yet further resentment and hostility from the nation’s local communities. Is this the effect that was intended?

**The way ahead: a two-way dialogue**

Earlier in this response we have identified areas in which a two-way dialogue is needed. The White Paper one-way consultation steers towards an eventual developer-led and developer-friendly Housing policy. This should be replaced with a more pro-active two-way, ongoing dialogue between the DCLG and the communities they serve. We summarize here some of these areas requiring further such dialogue:

*Recommendations for further two-way dialogue*

1. Green Belt designation is effectively off limits; permanence as a restraint on urban sprawl is the defining aspect of Green Belt, and any net loss could never be acceptable. The community should be put back in charge of having their greenbelt and treasured green spaces (such as parks and playing fields) protected.

2. The preservation of community assets and land bequeathed to the community, rather than being sold off.

3. Communities should be invited to development processes early on, to genuinely shape the way they would like their area to look, and where they would like development to go. This means also that they should have the right to say where development should not go. Local Plans should not be an excuse to design a Developers’ Charter, but should be truly transparent and honest in including the community’s vision, opinions and choices. Neither should the Local Plan be a Government social engineering tool to force LAs to build homes according to inflated national population predictions. Thus Local Plans should not be developer-led but community-led.

4. More effort is needed by LAs to reach all persons in the community, to involve them in the development process, rather than box-ticking consultations (which are often complex and over-long) in which the community voice is not heeded.

5. Financial support for community responses made available to independent community groups with impact in representing the community voice.

6. More realistic timescales for community responses to planning applications.

7. Planning conditions should be maintained to safeguard communities.

8. Extended mayoral powers should be used to afford protection to residents, and not to railroad through compulsory purchase against residents’ will, particularly affecting the elderly. Thus compulsory purchase reforms should maintain or even extend proper protection for landowners.

9. Development should be guided away from protected habitats.

10. If infrastructure (especially the road transport network) is already fragile and over-capacity, there should be an embargo on further housing development in that locality. Merely improving the transport infrastructure with a view to subsequent housing development runs the risk of the transport system again becoming over-loaded.

11. Industrial areas should be clearly separate from residential areas, and transport infrastructure developments should by-pass residential areas. Mitigation is not a helpful concept, and our experience is that this term is used as an abdication of responsibility in dealing with the problem properly.

12. Independent Housing Need Assessment Panels should be inaugurated, to include equally persons from the environmental lobby, community groups, and the public and private housing sector, to prevent undue influence by those who would benefit by an inflation of housing need.

In conclusion, we strongly recommend that the White Paper consultation questions require a major, complete redrafting, bringing out more clearly ways that communities can expect to participate in the planning process. The document should reflect much more vigorously the name borne by the Department authoring it: the Department of ***Communities*** and Local Government. Our recommendations for two-way dialogue are a constructive move to bring these reforms.