

ELMLEY CASTLE, BRICKLEHAMPTON & NETHERTON PARISH COUNCIL

Planning for the Future Consultation
Ministry of Housing, Communities and Local Government
3rd Floor, Fry Building
2 Marsham Street
London
SW1P 4DF

27th October 2020.

Dear Sir / Madam,

PLANNING FOR THE FUTURE – WHITE PAPER ON PLANNING REFORM

Elmley Castle, Bricklehampton and Netherton Parish Council wish to make the following comments on the 'Planning for the Future – white paper on Planning Reform'.

The white paper includes many proposals, including these:

- That the right of local people to respond to individual planning applications is removed.
- That local authorities should instead *“radically and profoundly re-invent the ambition, depth and breadth with which they engage with communities as they consult on local plans”*. Historically, few members of the public engage with the planning system prior to receiving individual planning notices. Changing this to achieve a fundamental shift in public behaviour, represents an enormous, unprecedented challenge. There is no mention of how it should be achieved, nor of funding for doing so.
- That removing the right to respond to individual applications is justified because consultation adds delay and allows a “small minority of voices, some from the local area but often not, to shape outcomes”. No evidence of outside voices is offered. In the experience of this parish council, it is a rare event. Most planning applications affect a small minority of local people: shouldn't they have a right to object? Other locals often prove to be the ones who possess local knowledge about, for example, historical use and the presence of rare species. Their knowledge is essential to proper scrutiny and better decisions. Must it be discarded?
- That the process of creating local plans should itself be streamlined with *“more democracy”* taking place at the plan-making stage. This acknowledgement that the planning process is part of our democratic system is welcome.
- That greater participation in the local plan making process should be delivered via the internet. In 2019 the ONS reported that 5.3m people (8.4% of UK) do not have internet access at home. They consist mainly of the elderly, disabled and other disadvantaged groups. Excluding them will result in not in more democracy, but less.
- That, to quote in full: *“Local Plans should be subject to a single statutory “sustainable development” test, and unnecessary assessments and requirements that cause delay and challenge in the current system should be abolished. This would mean replacing the existing tests of soundness, updating requirements for assessments (including on the environment and viability) and abolishing the Duty to Cooperate [with neighbouring local authorities]. The suggestion that current assessments and requirements are “unnecessary” is concerning and appears to conflict with government commitments on environmental protection. Abolishing the duty of local authorities to cooperate with each other appears to conflict with environmental commitments and those encouraging ‘joined up government’.*
- That elements of policy making for local plans be standardised centrally. This suggests a reduction in the ability of local plan to reflect local circumstances and thus not in more democracy, but less.

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- That zones will be created which will include Protected, Growth, and Renewal Areas. Especially if the new homes allocation for our district is trebled as proposed, this will not prevent development in the Protected Areas. It also appears that both the Renewal and Growth zones will suffer greatly reduced environmental scrutiny and protection. Again, the impact is likely to result not in more democracy, but less.

Overall, we fear that, if implemented, the current proposals will undermine participation and trust in the planning system and in local democracy itself. This matters both in relation to our built environment and our communities, because citizens who believe the system is not interested in them, stop trusting and complying with it, diminishing our society as a whole.

Kind Regards,



Andrew Robinson
Clerk to Elmley Castle, Bricklehampton and Netherton Parish Council.