



Planning White Paper London Forum Draft Response

15th October 2020



Presentation Contents

- PWP headlines
- Survey of LF members, main results
- London-specific factors
- Summary of LF response to consultation



Planning White Paper Headlines

PWP is proposing radical reform of the Planning system

- Simplification of local plans
- Mapping of all land into Growth, Renewal and Protection areas
- Widespread use of Design Codes to raise design quality
- “Best-in-class” community engagement in production of local plans and design codes
- No public scrutiny of design-compliant planning applications in growth and renewal areas
- Housing targets set by Government for each LPA
- Development management policies set centrally and applied nationwide
- More extensive use of modern technology throughout the Planning process
- Simplified developer contribution based on uplift in value, and payable on completion



Survey of London Forum members

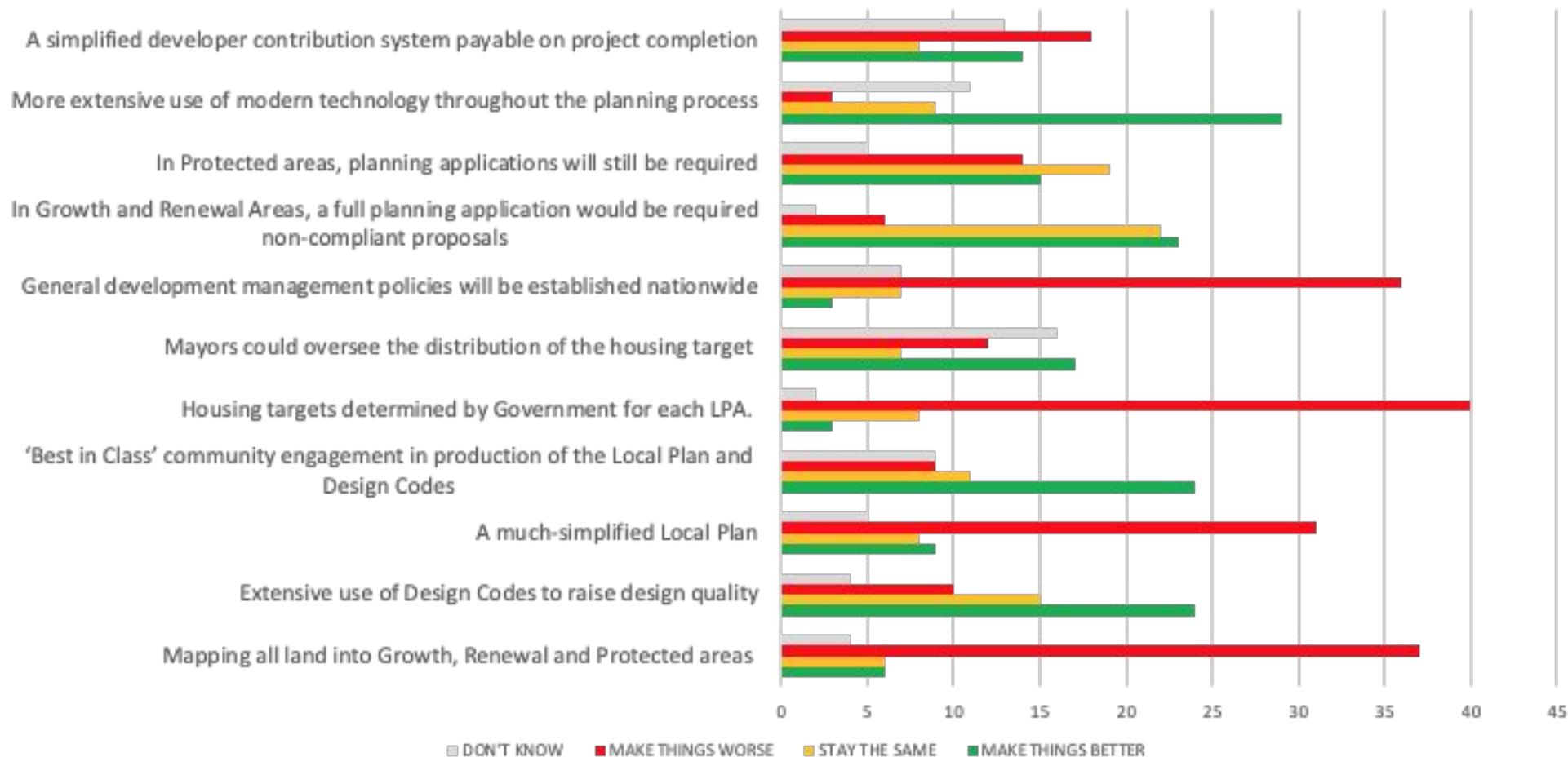
Where is the Planning system failing?





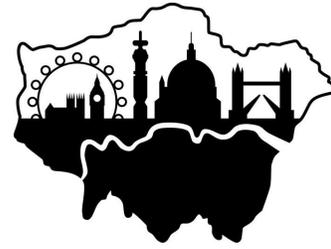
Survey of London Forum members

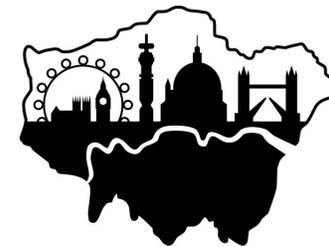
Do you support the Government's proposals?



Survey of London Forum members

Do you share widely expressed concerns??





London-Specific Factors

London Forum's response must capture the "London dimension"

- London has a functioning strategic planning authority, the Mayor and GLA. Boroughs are used to preparing plans in conformity with policies in the London Plan, and to negotiating housing targets with the Mayor
- The Capital has ca. 300,000 unbuilt housing consents, more than the number of homes built in the last decade
- Greenfield sites are a rarity, the wider south-east must contribute to the alleviation of London's housing problems
- London's housing market is unique, appealing to investors worldwide. Those in low-paid occupations will never climb up the housing ladder, they need homes for social or low-cost rent



London Forum Response to the PWP (1)

- Since publication of the PWP, there seems to be some backpedalling going on, probably in response to hostility from many Tory MPs
- SoS, Robert Jenrick has said that this is incremental change, that it will take several years to accomplish, and that we should start with some pilot LPAs
- Whilst welcoming the dawning recognition of the scale of the task, London Forum can only comment on the White Paper as published
- Unlike most White Papers, this one leaves many important questions unanswered, such as:
 - What is the status of the London Plan, and does the Mayor's Planning role remain unchanged?
 - How will the need for homes for social and low-cost rent be met if developers can avoid the Infrastructure Levy by offering reductions on starter homes for those in well paid jobs
 - How will the design coding mountain be tackled and resourced?
 - How will the current Duty to Cooperate be replaced
 - What will be done to ensure that consented sites are built out promptly?
 - Will any of the proposals be introduced before a Planning bill is published



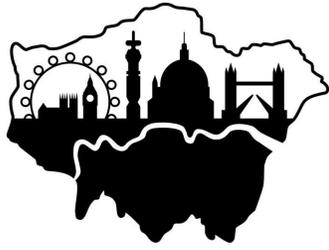
London Forum Response to the PWP (2)

- London Forum welcomes the earlier and more intensive involvement of local communities proposed in the PWP. However the Govt must make clear what is meant by “**best-in-class**” **community engagement**, and how to ensure that LA’s implement such best practice
- The proposal to assign all land to one of three categories - Growth, Renewal and Protection – with design codes for allocated sites, a sort of “Zoning Lite” appears to suffer all the drawbacks of a fully fledged zoning system (huge up-front effort, inflexibility) and few of the benefits; in particular, there is no assurance that what gets built is what the community has supported in the Local Plan, nor that refusals by local Councils will be upheld
- The option to submit non-compliant applications and have them decided (by the LPA or on appeal) according to national policies which will necessarily be high level and open to interpretation, is likely to discredit the system in the eyes of those communities whose wishes have been circumvented. A community right of appeal would address this, but that is not in the PWP



London Forum's Response to the PWP (3)

- **Local Plans** can and must do far more than allocate land and annotate sites for development. They must provide the rationale for such decisions by articulating a vision and strategy for the area as a whole.
- **National development management policies**, as set out in the NPPF have a part to play, but they cannot deal with the fine-grained differences between localities. Will central Government specify nationwide rules for depth of basements or hours of construction?
- Abandoning the **Duty to Cooperate** could be damaging for London, particularly if the Mayor's role is diminished. Boroughs need to work together on many matters, and with adjoining LAs on London's perimeter if the housing needs of those working in the Capital are to be met.
- The proposed **Standard Method** for setting housing targets for each LA is hopelessly ill-suited to London's circumstances. It deliberately weights targets towards those boroughs where prices are highest, and the capacity to meet those targets lowest. It also disincentivises boroughs with growth opportunities.
- The PWP acknowledges that Land Banking is an issue but makes no proposals to ensure faster **build-out rates**. London Forum proposes that at a minimum, Council Tax should be levied 3 years after consent is granted, whether completed or not.
- The **Infrastructure Levy**, as proposed is not fit for purpose, much of the yield being targeted towards starter homes that will only be affordable for the more highly paid Londoners. It will damage the (already precarious) delivery of homes for social rent. And there is no provision for all the other matters covered today in S106 agreements



London Forum's Response to the PWP (4)

- Overall, the PWP is thought provoking, and we welcome a number of the ideas especially on community engagement; but much of it is poorly thought through and insufficiently detailed
- Currently there is no evidence to show that the ideas in the PWP are capable of implementation, or that they will deliver the aspired benefits. It will be hugely risky, and disruptive to embark on a programme of legislation without first testing these ideas on the ground
- The proposed timescales for Councils to prepare new Local Plans are too short and it will need more resources and skills in some boroughs
- If the Govt is determined to press ahead, then it should do so via well-resourced pilots in a representative sample of LAs, allowing the proposals to be fine-tuned, and to establish credibility
- In the meantime the Government should commit not to introduce elements of its proposals via Statutory Instruments or changes in planning regulations