



Planning for the Future: consultation submission.

While I have long argued that our planning system is broken (and am therefore very pleased indeed to see the Government's recognition that it needs significant reform and a number of welcome and important measures on design codes, leisure space and trees), and support the Government's commitment to build significant new housing, I am writing to outline serious concerns (expressed by many within my constituency and elsewhere across the country) with regards to a number of the reforms proposed in the Government's 'Planning for the Future' consultation – in particular:

- the extraordinarily disproportionate allocation of the new housing to rural greenfield agricultural land instead of brownfield urban / suburban sites
- the replacement of the local infrastructure levy for a national levy only payable AFTER development (when the key is to build it BEFORE)

This consultation is closely associated with the 'Changes to the Current Planning System' consultation and I have therefore included my submission to that consultation again here – as the vast majority of points there remain pertinent here.

As I made clear previously, and have stated consistently throughout my time as the MP for Mid Norfolk, the public rightly expect planning to be just that: the co-ordination of the location, layout, design, mix – and associated physical and public service infrastructure – of housing and commercial development.

There has been widespread, and ever growing, public anger about the lack of real local planning over recent decades and the move to a system in which local council control and discretion is reduced, infrastructure funding is cut, and large scale out-of-town volume housebuilders are able to 'bank' permissions and exploit the 5 year land supply rules in the NPPF to force large scale housing – without infrastructure – on the outskirts of villages and towns with wholly insufficient infrastructure.

Whilst these reforms contain *some* good measures – especially on design codes and trees, and in their desire to speed up the entire planning process – they, like the reforms proposed in the 'Changes to the Current Planning System' consultation, fail to actually address the real issues that the existing system of planning in this country perpetuates and which have been/continue to be the basis upon which I, and many others, have been calling for proper reform.

Without changes, I fear these proposals will prove to be both undeliverable AND worsen the situation and, despite some minor positives, add a plethora of new problems to our planning system and serve to strengthen the hand of those aggressive out-of-town developers intent on dumping large volumes of housing on communities – with little consideration of the welfare of residents or the sustainability of the developments themselves.

I have set out here the reasons why I am so concerned.

1. The reforms will significantly, and disproportionately, impact rural areas

As I outlined in my previous submission to the 'Changes to the Current Planning System' consultation, the proposed new algorithm detailed within it will result in some of England's most rural districts seeing an average of 59% increase in their housing need calculation – compared to a much more modest average of 20% in our major urban areas.

In my own largely rural constituency of Mid Norfolk, it is in fact even worse for the two districts: Breckland and South Norfolk.

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As Lichfield have calculated, under the current Standard Method, Breckland is required to deliver 661 new homes (and has delivered, on average over the last three years, 692 homes a year – some 80 homes more than the current Local Plan requirement). The new Standard Method would increase the number of homes Breckland must deliver to 1,070 – which equates to a **c.62% rise**.

Under the current Standard Method, South Norfolk is required to deliver 893 properties a year (and has delivered, on average over the last three years, 1,164 a year – some 301 homes more than the current Local Plan requirement). The new Standard Method would increase the number of homes South Norfolk must deliver to 1,832 – which equates to a **c.105%** increase. (Although South Norfolk is considered part of the Greater Norwich development area, this represents a startling figure).

These levels of additional housing are in addition to the existing targets which already represent a major phase of housebuilding in our area. The proposed targets are over 50% higher than the highest year of housebuilding achieved in our area in the last 20 years. They are simply undeliverable as proposed.

As I have stressed before, I and many colleagues across the House have been struck by the sheer level of shock and concern among district councillors, officials, parish councillors, residents, business groups and planning experts about the impact of the new algorithm on rural districts.

It is within this context that we must consider this latest White Paper consultation.

When combined with the new algorithm, the system of designating land in one of three categories (Growth, Renewal and Protected) will, I and many others, believe exacerbate the problems being faced in rural constituencies like my own – where aggressive out-of-town developers have manipulated the Planning system to lay siege to rural land that they would otherwise have had little to no chance of developing.

With the continued failure to properly define “sustainable” and “affordable” housing, these developers will have renewed strength to dump large volumes of wholly inappropriate and unsustainable housing on communities. When the removal of the local Infrastructure Levy is then also taken into account, we really will have the perfect storm: a Planning system that completely neglects the citizens it is supposed to serve by encouraging bad development that incubates the social and economic problems of tomorrow.

Furthermore, I would add that these proposals will worsen the pitting of North against South that I explained in my previous submission and, as a result, further undermine the ‘levelling-up’ agenda that the Government so boldly, and correctly set out.

2. A liberalisation of permissions does not guarantee supply

Despite 80 per cent of residential applications being granted, between 2010 and 2017 nearly half of all permissions remained unbuilt. There are currently up to 1m permissions not yet completed. This is outrageous.

Not only does the evidence suggest that the increase in permissions has *not* led to a corresponding increase in starts, I know first-hand from conversations with the leadership and officials at Breckland and South Norfolk in my constituency that this is indeed the case. In Breckland alone, I understand that there are currently **14,000 unbuilt, permitted homes**. In the Greater Norwich area (of which South Norfolk is part), that figure stands at **30,000!**

As I and many across the House have been arguing for years, we **need to incentivize building out**, ending disincentives, **not reward developers for their behaviour**. This should be combined with other strategies including compulsory purchase of empty homes, and brownfield development priority.

The new proposals completely fail to address this long-standing problem and continue to assume, for the most part incorrectly, that Local Government is to blame for many of these permissions remaining unbuilt.

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A proper solution to this “land-banking” is much needed and would unlock thousands of houses rapidly.

3. A step backwards for the “spirit of Localism”

As a newly elected MP back in 2010, I understood the need to get Britain building again post-Crash and embraced the Government’s desire to put in place a new model of “Localism” as a means of delivering that. Indeed, I strongly supported the 2011 Localism Act and have advocated for the “spirit of Localism” consistently over the last decade – certain that, while the Localism Act has its loopholes, reform could adequately address its weaknesses, empower local communities and pave the way for increased numbers of new housing in a way that ensured communities were on the whole happy with how they would grow, having had proper consultation and involvement.

(Although often slow at times, this “spirit of Localism” has, I have found, been widely popular. Popular frustration has been directed at its weaknesses, but the principle of “Localism” has been broadly accepted and embraced. There has been a desire for its weaknesses to be strengthened and improved, but never a strong view that it should be abandoned)

While the desire to simplify and speed up the process of producing Local and Neighbourhood Plans is correct and should be applauded, the proposals in their current form are completely unacceptable and will only serve to dramatically heighten Public distrust of the Planning System and, in turn, the Government.

Even were much improved resourcing and methods of publicising consultation be put in place, the proposed timeframes for public consultation are far too short. A total of 6 weeks in the entire 30 month Local Plan making period is appalling. Vast swathes of people will miss out on having a proper say in the Plans that will be used to dictate how their communities will grow over the coming decades.

(I would also stress that, with all of this public consultation proposed to take place online (most likely via an App), a still significant section of society will be disenfranchised. Not only will many vulnerable and elderly be unable to properly engage with the process, but many living in rural areas like my own, who still do not have sufficient broadband provision or speed will be seriously adversely affected. Despite the progress that has been made, my constituency of Mid Norfolk continues to lag way behind much of the rest of the county and country when it comes to Broadband. Written consultation must remain for the foreseeable future).

The principle that once land has been designated in one of the three categories, the sites within it can be deemed and viewed the same is also deeply flawed. In reality, no two sites anywhere (no matter how similar) are the same. The idea that, for example, a site on land designated ‘Growth ’can have applications brought forward, no matter how controversial, with no further consultation of local communities is ridiculous – especially if the public has only had 6 weeks to be consulted previously, when they would have still had no idea about the specific applications that will be put forward for those sites.

Such an approach will rapidly escalate public anger and frustration. Alternative methods for simplifying and speeding up the process for creating Local Plans need to be looked at. Those set out in this White Paper consultation cannot be allowed to be carried forward.

(One example that immediately jumps to mind is the inspection of Local and Neighbourhood Plans. Often when communities or districts have been innovative and ambitious when creating Plans that look to deliver development in a manner that properly respects existing communities and provides the infrastructure and services required to sustain it (and often at a greater volume than initially set out), the inspection process sees their work grind to a halt and substantially watered down as the Inspector repeatedly calls Plans back in and pulls them up on quite logical, but forward looking policies that are not ‘tradition’. The inspection process is of course hugely important, but it cannot continue to be a barrier to progress and ‘good development’).

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4. Pressure on local services.

The proposals do not properly address the need for a much more integrated approach to local public services. Too often we see new housing come with no extra capacity in GP surgeries, schools or other local facilities – simply adding to the existing pressures and resentment.

5. An alternative approach. How we SHOULD be building the levels of housing needed.

I would suggest a far better and more successful approach to the building of the homes we need would be:

1. Levelling Up. The Government has rightly committed to a programme of major regeneration in areas “left behind”. I wholeheartedly agree. So let’s focus the major construction boom of new home building in the Northern cities and conurbations, and in our deprived coastal communities to help reduce cost, spread growth and level up.
2. Concentrate the housing in a network of New Towns. We will never deliver the volumes – or affordability – required by incremental house-dumping on every town and village in the South East. Here in the East there are two or three places where you could build a New Town of c 50,000 houses on low price land without triggering major opposition, and ensuring infrastructure: at Mildenhall/ Lakenheath on the railway line on the Cambridge - Norwich growth corridor, and in NE Cambs on the grade 3 fenland around Wisbech. I dare say each county could happily find a location for a New Town.
3. Use incentives not punishments. Give LAs the incentive of retaining more of the income generated by house building locally so there is an incentive to build.
4. Infrastructure first. Instead of allowing developers to build first and add infrastructure later, we should mandate that it is the other way around.
5. Distinguish between Affordable and Social housing. Too often developments are built with commuter homes at maximum price point and then a bit of “social housing” at high density in the corner with no facilities. This model doesn’t work for anyone. Vulnerable low income families need access to services not being stuck in a car-dependent corner of a commuter estate.
6. Support the good rural affordable housing Associations like Hastoe and others who have pioneered successful models of rural affordable housing.
7. Build more houses closer to railway stations to reduce congestion, pollution and support public transport. We are still running a 1950s model of daily one person car commuting which is increasingly not what today’s young families want or the country can sustain.
8. Self-build. Why on earth are we still subsidising house-builders to build slow expensive old fashioned energy inefficient houses of brick when the modular and self/build sector can deliver so much quicker and more cheaply?
9. Energy efficiency. Housing must be aligned to our wider Net Zero ambitions. We are still building in the car-dependency and energy inefficiencies which we know aren’t sustainable.

Conclusion

Whilst I welcome the desire to reform a long broken planning system, the proposals here fail to properly address the fundamental issues at hand – and will for the most part worsen an already dire situation at the considerable detriment of communities and the Government politically. I fear the proposals will prove impossible to deliver, create a license for more of the lazy house-dumping by the big out-of-town developers without proper planning or infrastructure, reduce public trust in the planning system, backfire on local councils, damage rural areas and fail to deliver the Governments manifesto promises to level up areas left behind and cascade power out from London.

As with the ‘Changes to the Current Planning System’ consultation, I would like to request that the proposals are paused, reconsidered (in consultation with MPs and others) and amended before they are taken any further.

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