

## **'Planning for the Future' White Paper (2020)**

### **1. Streamlining the Planning Process**

The proposed three new Local Plan land designations (i.e. Growth, Renewal and Protected), should consider safeguards to ensure the following resilience and sustainability principles:

- High quality, resilient and 'future-proofed' communities should integrate new and enhanced green spaces (including parks, riparian and transport green corridors, urban woodland, nature reserves, allotments and community orchards). It will therefore be important within the proposed 'Growth' areas to ensure that the requisite protection and policy mechanisms to bring forward new urban green space are central to the proposed planning reforms. Recent experience during the COVID-19 pandemic has underlined the value to individuals and communities of access to high quality local semi-natural greenspace and the negative impacts and harm arising from unsustainable levels of footfall where provision was below that required by local communities. Indeed, our Victorian and Edwardian forebears delivered a magnificent legacy of parks, squares and tree-lined streets at a time when the population was much lower than it is today. Provision of sufficient new accessible natural greenspace is therefore a priority going forwards and must not be jeopardised by potential 'urban cramming', especially within the proposed 'Growth' and 'Renewal' zones.
- As regards engagement with communities and stakeholders, there is currently a perception of mistrust in the planning system, which deters many from becoming involved because of a fatalistic resignation and belief that such engagement is ultimately futile. To genuinely engage communities and stakeholders, the new planning system will need to provide greater subsidiarity in decision making to enable genuine local democratic control of such placemaking. Local community cohesion and trust in government is at stake in relation to the proposed planning reforms and a system which delivers for the local community, the UK and the planet, not just perceived developer and landowner interests, should be a central aspiration of any planning reforms.
- The proposed 'Sustainable Development Test' will need to be informed by a prescriptive 'check list' of planning parameters to ensure good design, environmental sustainability, net-gain for biodiversity, affordability and viability.
- Standardised digital mapping for local plans must incorporate layers providing the latest hazard, risk and ecosystem services opportunity mapping to inform planning policy and management decision making. For example, surface-water, fluvial and coastal flood plain, the routes of

Major Accident Hazard Pipelines and other utility networks, Air Quality Management Areas, utilities networks resilient to severe weather impacts, reservoir inundation zones, offsite Detailed Emergency Planning Zones for industrial and defence facilities, and land with opportunity to create urban and suburban wetlands and woodlands (to provide ecosystem services, enhance biodiversity and air quality and provide flood amelioration benefits).

- Development of a comprehensive 'Resources and Skills Strategy' must encompass increased awareness and knowledge in fields of resilience, environmental sustainability (such as energy/water efficiency and renewable energy generation) and protection and enhancement of biodiversity in landscape and built development design. Resilience and Emergency Planning considerations should be covered by the statutory consultee role to ensure 'future-proofed' resilient communities and landscapes.
- The proposed land zoning approach must address appropriate protections for urban brownfield sites which support a rich biodiversity. A reliance upon SSSI and SACs, which have a strong historic and rural emphasis, is insufficient to protect biodiverse brownfield and other urban wildlife sites. A new designation of 'urban wildlife site' and the research required to identify such exceptional urban biodiversity hot spots should be introduced.

### **2. Moving from a process based on documents to a process driven by data**

Digital tools should include the latest mapping as relates to a standardised approach to identification of local risks and vulnerabilities including flooding, reservoir inundation, Major Accident Hazard Pipelines and industrial (COMAH / REPPiR) offsite impacts. Thus ensuring informed 'level playing field' decision making in relation to where development is best located and mitigation measures (such as ensuring protection and re-naturalisation of floodplains and river catchments). Such an approach could significantly reduce risk to people, the environment and the economy and repay the investment many times over. The current variations in mapping and associated emergency planning around such risks is bad for people and business. A 'levelling-up' of resilience and emergency planning to the standards achieved in exemplar Local Authorities and Resilience Forums is required.

Habitat and biodiversity opportunity mapping data should also inform planning decisions going forward and be integrated into spatial mapping. These will align with resilient landscape mapping and deliver optimal planning decisions for all stakeholders and the environment.

As climate change and population growth intensifies it is vital that planning decisions acknowledge resilience principles and ensure new communities design out risk through their siting, layout and construction. Better mapping,

informing better design and layout is central to realising the aspiration of resilient communities and landscapes.

### **3. Bringing a new focus on design and sustainability**

It is clear that if net-zero is to be attained by 2050 planning permissions granted today will need to ensure optimal energy efficiency, incorporation of renewable energy generation and support delivery of new and enhanced wetlands and woodlands. Retro-fitting of such innovations will be technically difficult and far more expensive than early implementation of low carbon technology and landscaping enabling sequestration of greenhouse gases. Design codes and planning guidance must therefore be more ambitious and scientifically informed and sustainable design levelled-up and appropriately monitored to ensure that it is real and not a paper exercise. A legacy of polluting development will make attaining net-zero impossible.

In terms of the future of the planet and humanity stemming the worsening ecological crisis is as important as ensuring net-zero. Therefore, the planning system must make sure new development optimises opportunities for biodiversity must be central to any new planning system. Despite references within the MPPF and the MPPG many planning applications do not seek to integrate wildlife habitats into either built development or landscaping -the new system must deliver for wildlife.

Severe weather, in terms of increased storminess, flooding and drought will inevitably intensify in coming decades and it is therefore vital that planning design codes and guidance ensure resilient construction materials and landscaping in all development. This requirement to “harden” development against severe weather impacts especially applies to utilities, as loss of power or water can have a profound negative impact upon local communities and will become an increasing risk as climate change intensifies.

Good design must also apply to the landscape as there is currently inadequate access to semi-natural green space in many urban and rural areas, with insufficient semi-natural land to mitigate and ameliorate flooding and other severe weather impacts. If we build in space for water and nature we can deliver more resilient, better designed and desirable communities which are better climate-proofed and support ecological recovery.

### **4. Improving infrastructure delivery / reform of developer contributions**

Any revised planning approach should emphasis the requirement for all new infrastructure to be resilient to severe weather and other challenges. Developer contributions must therefore facilitate both planning and physical works to deliver greater community and landscape resilience. This could include providing funding for flood defences, upland re-forestation and purchase and re-naturalisation of floodplains and catchments. The additional burden upon resilience and emergency planning, response and recovery must be

acknowledged, with developer contributions supporting the additional contingency planning burden arising from development within potentially vulnerable locations and an increasing local population.

A re-examination is also appropriate of the proposed trigger threshold for Infrastructure contributions at 40 units. Local evidence suggests that this would incentivise applications of 39 units (to avoid contributions and maximise profit) and therefore making coherent planning and infrastructure delivery problematic.

Further, the White Paper does not systematically address the issue of developers banking planning applications. A clearer regime where permissions lapse and full applications are required (rather than rubber stamp renewals) may be appropriate.

### **5. Ensuring more land is available for homes and development**

The emphasis upon more development being delivered in growth hot spots is unsustainable and planning tools should seek a more balanced spatial distribution of development. There is currently very significant and unsustainable housing demand pressure upon areas around London and the wider South East. For example, research by the Centre for Ecology and Hydrology evidenced more urbanisation in Kent than any other county in the UK between 1990 – 2015, such a 'predict and provide' demand-led approach is unsustainable in terms of environmental sustainability, local quality of life, social cohesion and biodiversity. A nationwide burden sharing approach in terms of new development and growth should be central to these planning reforms. This more equitable growth burden sharing approach should be supported by developer investment to provide the ICT, public transport and other infrastructure required to move away from the current South East focused housing demand.

Any planning changes to promote competition amongst developers must ensure a levelling-up rather than any reductions in design quality, environmental sustainability or open space provision.

Larger developments currently deliver optimal associated infrastructure yield and allow for the economies of scale required to support investment in areas such as green technologies and new open space. Any atomisation of the planning landscape must therefore ensure that infrastructure and design quality is not weakened.

### **6. Increasing tree cover**

The working group have consistently supported increasing tree cover in the borough. In their Emergency Tree Plan the Woodland Trust sets out a vision for a major increase in tree cover to the 19%. This is also recommended by the national Committee on Climate Change.

<https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/>

**7. Consider the Wildlife Trusts recommendation of creating new designation – Wildbelt**

The working group supports the Wildlife Trusts call on the government to ensure the planning system helps address the ecological and climate crises by protecting new land for nature's recovery and creating a new designation called Wildbelt. <https://www.wildlifetrusts.org/news/governments-planning-reforms-must-address-nature-and-climate-crisis>