

Planning for the future white paper published Aug 2020

Sustain briefing for members and staff and draft response

This consultation covers a package of proposals for reform of the planning system in England, covering plan-making, development management, development contributions, and other related policy proposals.

The proposals in this paper apply to England only. Consultation lasts for 12 weeks from 6 August 2020. (29 Oct deadline)

Responses can be made via the website <https://www.gov.uk/government/consultations/planning-for-the-future> or by email to planningforthefuture@communities.gov.uk.

The consultation contains a set of questions. Sustain is not proposing to be constrained by the questions in making our response.

Please respond to the consultation on behalf of your own organisation, drawing on relevant points in our draft response.

If there are issues you think we have missed please email gillian@sustainweb.org before 21 October.

Overview

The aim for the reform is for the planning system to be fit for purpose. So that it makes land available in the right places and for the right form of development. In doing this, it must ensure new development brings with it the schools, hospitals, surgeries and transport local communities need, while at the same time protecting architectural heritage and natural environment.

Key elements of the proposals are for the preparation of reformed Local Plans, development of new design codes, a major overhaul of development contributions, and a new streamlined approach to decision-making. It is recognised this will have profound implications for how local planning authorities operate in future.

The consultation document does not address every detailed part of the planning system, its function and objectives, but rather focuses on the key reforms that can help improve the delivery and quality of homes and neighbourhoods, set within the drive towards net-zero greenhouse gas emissions by 2050.

The focus of local planning authorities is to shift towards the development of clear Local Plans and high-quality design codes which set the parameters for development – “rather than making discretionary decisions based on vague policies.”

The introduction sets out a list of challenges with the current planning system including:

- There is not enough focus on design, and little incentive for high quality new homes and places.
- Not enough homes are being built, especially in those places where the need for new homes is the highest.

Government has a vision embracing beautiful places, physical and mental health, social justice, which no one would argue with – but how will this be interpreted and does it aim towards a sustainable food system.

Government wants to:

- support home ownership, helping people and families own their own beautiful, affordable, green and safe homes, with ready access to better infrastructure and green spaces;
- increase the supply of land available for new homes where it is needed to address affordability pressures, support economic growth and the renewal of our towns and cities, and foster a more competitive housing market;
- help businesses to expand with readier access to the commercial space they need in the places they want and supporting a more physically flexible labour market;
- support innovative developers and housebuilders, including small and medium-sized enterprises (SMEs) and self-builders, those looking to build a diverse range of types and tenure of housing, and those using innovative modern methods of construction;
- promote the stewardship and improvement of our precious countryside and environment, ensuring important natural assets are preserved, the development potential of brownfield land is maximised, that we support net gains for biodiversity and the wider environment and actively address the challenges of climate change; and
- create a virtuous circle of prosperity in our villages, towns and cities, supporting their ongoing renewal and regeneration without losing their human scale, inheritance and sense of place. We need to build more homes at gentle densities in and around town centres and high streets, on brownfield land and near existing infrastructure so that families can meet their aspirations. Good growth will make it easier to level up the economic and social opportunities available to communities.

Proposals

Proposals look at the way the planning system works from plan making through to planning applications

The planning process is to be streamlined with more democracy taking place more effectively at the plan-making stage, and the entire corpus of plan-making law in England is to be replaced to achieve this.

- Simplifying the role of Local Plans, to focus on identifying land under three categories – Growth areas suitable for substantial development, and where outline approval for development would be automatically secured for forms and types of development specified in the Plan; Renewal areas suitable for some development, such as gentle densification; and Protected areas where – as the name suggests – development is restricted. This could halve the time it takes to secure planning permission on larger sites identified in plans. We also want to allow local planning authorities to identify sub-areas in their Growth areas for self- and custom-build homes, so that more people can build their own homes.
- Local Plans should set clear rules rather than general policies for development. We will set out general development management policies nationally, with a more focused role for Local Plans in identifying site- and area-specific requirements, alongside locally produced design codes. This would scale back the detail and duplication contained in Local Plans, while encouraging a much greater focus on design quality at the local level. Plans will be significantly shorter in length (we expect a reduction in size of at least two thirds), as they will no longer contain a long list of “policies” of varying specificity – just a core set of standards and requirements for development.

Plans should be significantly shorter in length and limited to no more than setting out site- or area-specific parameters and opportunities.

Local Plans will identify three types of land – Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected. All areas of land would be put into one of these three categories:

There is to be a new emphasis on engagement at the plan-making stage and communities will be able to set standards for design upfront through local design codes. This will enable consultation at the planning application stage to be *streamlined*, “because this adds delay to the process and allows a small minority of voices, some from the local area and often some not, to shape outcomes”.

There is to be a greater, more detailed role for the National Planning Policy Framework. It is intended the National Planning Policy Framework will provide a clear basis for those matters that are best set in national policy. There is no detail as to how the content will be compiled and agreed.

The National Planning Policy Framework will target those areas where a reformed planning system can most effectively address climate change mitigation and adaptation and facilitate environmental improvements.

The National Planning Policy Framework will have a greater focus on ‘placemaking’ and ‘the creation of beautiful places’ with an expectation for new development to be beautiful, and to create a ‘net gain’ not just ‘no net harm’.

Infrastructure delivery in all parts of the country is to be improved and ensure developers play their part, through reform of developer contributions.

Government will ensure more land is available for the homes and development people and communities need, and to support renewal of our town and city centres.

It is suggested better use of digital technology will make it easier for (all?) people to understand what is being proposed in their neighbourhoods and provide new ways to feed their views into the reformed system.

Innovators, entrepreneurs and businesses will benefit from a planning system that is much more adaptable to the changing needs of the economy.



Proposals are illustrated by a lovely view of the new world – a vegetation clad corner shop in a Victorian building

[Our blog](#) started the debate within the Sustain community.

Draft Sustain response

About Sustain, the alliance for better food and farming

Sustain is the UK's alliance for better food and farming, a UK charity bringing together hundreds of third-sector, business groups, local authorities and communities at national and local level to improve the food we eat and the way it is produced, so that it is better for people and the planet. We champion policies to improve children's health; farmer and food worker livelihoods; and the impact of production on the environment and nature; grassroots work to alleviate food poverty, support community growing and enterprise skills; and promotion of vibrant food cultures, good food education and traditional production techniques.

The New Planning System

1 Sustain calls for a planning system that

- embeds core development principles into national development management policies
- reflects regional and local differences
- identifies land to be safeguarded for food growing (rural, periurban and urban)
- brings forward housing development with sufficient amenity green space for multiple purposes including community and private food growing
- provides all homes with internal space for food storage, preparation, and cooking, allowing the household to eat together when they wish
- ensures access to healthy food and avoids easy access to unhealthy food
- encourages local entrepreneurship in sustainable food industries.

2 We welcome changes which address

- hearing the voices of communities & learning from their local perspectives
- a reduction in jargon
- legal interpretations of policies and practices obtained by developers ie the part of the planning process which does not form part of published plans and is only accessible to those with access to planning lawyers
- the imbalance between the interests of landowners and the achievement of public benefit

Pillar One Planning for development

Local plans

3 Sustain agrees Local Plans are a good foundation on which to base reform, as they provide a route for local requirements to be identified and assessed, a forum for political debate and for different views on the future of areas to be heard.

4 We agree that there is a role for more detailed strategic policies to be included in the National Planning Policy Framework to avoid duplication and inconsistency in approach in agreeing policies through local plans which meet national objectives eg Obesity strategy, <https://www.gov.uk/government/publications/tackling-obesity-government-strategy>
Farming for the Future.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/868041/future-farming-policy-update1.pdf
National Food Strategy. <https://www.nationalfoodstrategy.org/wp-content/uploads/2020/07/NFS-Part-One-SP-CP.pdf>

5 Citizens do find the system complicated, time consuming and plans take too long to sustain interest. More emphasis is to be put on coming to agreement on development principles upfront. But

citizens cannot envisage how this will affect them until they see details of a specific proposal through an application.

6 We are starting with places that already exist with current patterns of land ownership. Local plans must manage & resolve the intricacies of change happening within the current framework of development. Allocation of land into 3 categories is too simplistic.

7 Areas for significant development (Growth areas), provide the best opportunity to make significant changes to the way we live and our access to good food. Masterplans should recognise the importance of communal gardening and food growing, the role these play in ensuring active healthy lifestyles and in building communities. Site layout should ensure adequate private and communal space to integrate food growing.

8 The definition of Protected land must include land in horticultural and in agricultural use to ensure greater food security and resilience, especially in the context that a high proportion of the population is currently not eating enough fruit and vegetables for a healthy diet

<https://foodfoundation.org.uk/wp-content/uploads/2020/06/Veg-Facts-2020.pdf>

9 Local Plans will need to identify land to meet a range of development needs. The planning system should be supportive of the role of food in the economic recovery.

<https://www.sustainweb.org/publications/economic-recovery-briefing/?section=>

10 In the reformed planning system, how will planning policies:

- reflect regional & local differences
- be responsive to real situations on the ground
- be flexible to new forms of development, to innovation, to new ideas not envisaged when policies were compiled.

Frequent updating of local policies will result in community fatigue and loss of confidence in the system

11 The consultation asks (Question 4) What are your top three priorities for planning in your local area? and lists a choice of planning related activities.

In response, Sustain points out that Planning is about achieving well balanced, liveable communities and no one element takes priority over another set of priorities in achieving sustainable development.

12 The planning process can help to bring about sustainable local food systems in new communities. Case studies show that designing places which include sustainable local food systems can also help to create healthy and vibrant places. The multiple benefits include:

- improved health and wellbeing;
- inclusive and sociable communities;
- environmental restoration and sustainability, including resilience to climate change;
- opportunities for economic development, investment and skills development; and
- improved amenity and good urban design.

13 Food is an opportunity to rejuvenate and maintain high streets.

https://www.sustainweb.org/news/jul20_healthy_high_streets For example, in the UK, fish landed by our local fleets is generally either exported or sold to restaurants and fishmongers. Covid has been disastrous for our fishing industry, so it is very important that routes to market like fishmongers are enabled through the planning system, not pushed out. <https://www.sustainweb.org/news/sep20-use-classes-order> We foresee a loophole in the recent changes to the Use Classes Order which will force independent food retailers (bakers, greengrocers, butchers, fishmongers etc) off the high street to be replaced by services and offices.

Development management policies

14 It is proposed that the National Planning Policy Framework (NPPF) would become the primary source of policies for development management.

Sustain agrees

- a) There is currently a policy gap at national & regional levels.
- b) There is repetition across local plans of key policies, duplication of effort across local planning authorities in getting these policies adopted and inconsistencies at the examination stage.
- c) Policies which are supported by national priorities such as the Obesity Strategy should be published in the NPPF.

Sustain is concerned that:

- a) Local planning authorities do not have the resources to produce design guides and codes to cover the whole of their area. Without a detailed local policy framework how will the planning applications that still need to be made be determined?
- b) Many local planning authorities already produce high quality guidance and supplementary planning documents which support a sustainable food system within the current system.
<https://www.blackburn.gov.uk/sites/default/files/media/pdfs/SPD-Planning%20for%20Health.pdf> <https://www.brighton-hove.gov.uk/sites/default/files/2020-09/FINAL%20Food%20PAN%202020.pdf>
<https://www.harperperry.co.uk/portfolio/items/hull-residential-design-guide-spd/>
- c) However, loopholes enable developers to avoid well designed developments. The new system should ensure encouragement, support and confidence for local planning authorities to expedite this work.
- d) It is not clear how local policies would be agreed/justified; policies should be drafted according to local circumstances and reflect the social, economic and environmental opportunities and needs of that particular area. This could vary between neighbourhoods as well as between neighbouring towns to ensure equity and redress imbalances.
- e) How will coordination between metropolitan authorities be achieved? The status of the London Plan is not mentioned in the White Paper.

Revised NPPF

15 Sustain recommends National development management policies to achieve a sustainable food system covering:

Food growing

- Allotments
- Community gardens
- Growing enterprises / food production
- Land/soil protection
- Edible landscaping (also applies to public realm)

Access to healthier food through retail

- Markets
- Hot food takeaways
- Farm shops
- Community / local shops

Access to healthier food in the Public Realm

- Drinking water fountains
- (Food and Drink) Advertisements
- Edible landscaping

Access to healthier food in the home

- Internal residential standards for food storage, kitchens and dining.

Transport

- Walking, cycling, public transport

Housing requirement figures

16 In calculating the housing requirement figures,

- a) The white paper gives insufficient attention to the land needed to create healthy communities (adequate internal space for cooking, dining and food storage. Adequate provision of food retail nearby to the new developments, not necessitating travel by car.
- b) Adequate private and/or communal open space must be factored into the algorithm giving residents the opportunity to garden and grow their own if they wish. Densification, infilling and development of brownfield sites must not be achieved at the cost of residents' physical and mental health.

<https://www.sustainweb.org/growinghealth/evidence/>

https://www.kingsfund.org/sites/default/files/field/field_publication_file/Gardens_and_health.pdf

Pillar Two – Planning for beautiful and sustainable places

17 The White Paper states:

“planning should be a powerful tool for creating visions of how places can be, engaging communities in that process and fostering high quality development: not just beautiful buildings, but the gardens, parks and other green spaces in between, as well as the facilities which are essential for building a real sense of community. It should generate net gains for the quality of our built and natural environments - not just ‘no net harm’.”

Sustain strongly supports this aim. The challenge is how to achieve this with higher densities and in the context of viability. It is so often the elements which make a development liveable that are omitted from the built out schemes or are eroded in subsequent development.

Design codes, “fast track for beauty”

18 Beauty is not skin deep. The definition of beauty should apply across a development, not to individual homes. This must mean the end to obesogenic environments

https://www.sustainweb.org/planning/for_planners/#3

https://www.sustainweb.org/news/oct19_edible_garden_cities/

<https://www.sustainweb.org/news/feb18/>

19 To date, NPPF and the National Design Guide have not adequately addressed access to healthy food and urban food growing in the layout of development and the internal and external

design of new homes. This should be rectified in the National Model Design Code, the revised Manual for Streets and in other building quality standards.

20 How residents can grow, cook and eat healthily - access to good food - is an issue for the development industry. High density developments at all social scales are putting people at risk of food poverty. Reliance on pre-prepared food, often high in fat, sugar and salt, as a regular part of the diet leads to poor health outcomes such as diabetes and heart disease. However, families cannot be blamed for taking these choices if they live in small homes.

21 A decent home is one where there is access to healthier food and where routes to poverty are avoided through design. New residential developments should be built with enough space for cooking and dining to avoid dependency on takeaway food.

- Provision of functional kitchen and dining facilities
- Space to store food and to prepare & cook fresh food.
- Relevant to single person households and family homes

National standards must ensure new residential developments are built with enough space for food storage, cooking and dining

Effective stewardship and enhancement of our natural environment

23 We see no evidence that the ability to produce food in sufficient quantities has been taken into account in identifying land to be protected.

24 Rural and Periurban land should be safeguarded for food growing. Locally specific policies would be able to identify land on the periphery of urban areas which is most suitable for market gardening (high value produce, close to consumers).

25 In the wake of the Covid-19 pandemic, more than ever, we must unlock land around cities to create a renewed model of peri-urban food production across the UK. In the face of the climate and nature emergency, soil degradation and loss of natural ecosystems, growers and campaigners have been looking at food system shifts. These would change how we value food and factor in the public goods that the best types of farming provide. Farmers and farming advocates have been pushing to get the recognition that agro-ecological and nature-friendly farming is a necessity. We know this can flourish on the edge of cities, shortening supply chains, bringing food closer to the people and building a better understanding of how our food is produced.¹

26 The planning system should ensure long term certainty that land suitable for sustainable food growing will not be under a continual threat of development or be held for its "hope" value. This includes space for environmentally beneficial fruit and nut tree planting, community food and small farm enterprises, especially in horticulture. More fruit and vegetable production in the UK is needed given the vulnerability and sustainability of our current global supplies and because as a nation we are not eating enough for a healthy diet.

27 New entrants to farming are looking for land nearer to urban conurbations that could provide the kinds of outdoor part-time jobs that many city dwellers crave.² Sustain's briefing on land use "A Green and Pressured Land - making sense of the many competing demands for rural and peri-urban land" makes recommendations on how to balance the many pressures on land in the UK and our use of land overseas, including the impact of agriculture and the types of food consumed.³

¹ https://www.sustainweb.org/blogs/apr20_market_garden_cities/

² <https://www.sustainweb.org/news/aug20-fringe-farming-briefing-published/>

³ https://www.sustainweb.org/blogs/jun20_green_and_pressured_land_report/

Pillar Three – Planning for infrastructure and connected places

28 We welcome the intention that new development will pay for the services and infrastructure that it needs. Ongoing maintenance of those facilities must also be provided for. This has been a weakness in the current system. The challenge is to ensure this is achieved alongside the intention to encourage smaller developers who do not have a long term interest in the success of their development. There must be resources to enable development within the framework of a masterplan.

Much essential infrastructure, such as allotments and community gardens need to be in place on occupation. The change from funding through S106 to Infrastructure Levy raises concerns relating to timely delivery.

29 Our definition of connected places includes - Access to good food through:

- shops/markets selling a range of food within walking and cycling distance
- control of unhealthy food especially close to places where young people meet
- green space allowing local food growing within private and communal amenity land
- footpath and cycle routes into local countryside
- internal space standards to allow a family to cook, store food and eat as a household.
- community facilities and schools to have onsite kitchens and dining space

Making sure the system has the right people and skills

30 The planning reforms seem to focus on the professional role of planners rather than the leadership role of councillors. The decision taking role of local planning authorities is carried out by councillors; planners are their advisors. It is the role of councils and councillors to keep up with these reforms, show leadership, support changes and involve their communities. Where local councillors are progressive, change for the better can be achieved.

Implementing reform and engagement in the planning process

31 The intention is for “all communities, families, groups and individuals to have a say in the future of the places where they live.” Sustain has published an online toolkit to encourage the network of Sustainable Food Places (currently 60+ parts of the UK) to engage in plan making to achieve a local sustainable food system. It was a challenge to avoid the jargon, explain the various steps and avoid raised expectations on seeing new policies within a short timeframe. The food partnerships, who make up the SFP network, bring together public, private and community sectors locally to focus on delivering local projects and usually have little capacity to become experts in the planning system. Neither do they have the capacity to present their case for access to good food in the face of opposition from legal representations from large retail, catering and housing businesses.
<https://www.sustainweb.org/planning/>