



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

Dear Secretary of State,

### **Re. Planning for the Future – White Paper August 2020**

We welcome the opportunity to offer this Council's perspective on the proposed reforms set out in the White Paper. We make replies and comments to the questions in the accompanying document but highlight below some key issues that must be considered before adopting the proposed changes.

We understand the Government's principal objective is to simplify, speed up the planning process and build a greater number of homes to achieve the ambitious 'target' of 300,000 pa. The data shows 89% of major applications are decided within 13 weeks, and 87% are successful. Also, with planning consents outstanding for over 1m dwellings yet to be built, we do not consider it is the failure of the planning process that has caused the shortfall in house building numbers.

The proposals for Planning for the Future and the changes to the planning process have focused on one facet of the planning process. It fails to acknowledge that the building industry has experienced decades of shortages of skilled labour, and even construction materials, that constrains a substantial increase in numbers of homes that can be built. Moreover, macro- economic conditions have not been favourable to the industry, while affordability makes home ownership beyond the capacity of much of the population.

With the economy facing a deep recession, loss of regular incomes that can support a family home is likely to be the experience of many folk in the foreseeable future. This will deter them from taking on the level of debt that is needed to buy a property, especially in the London Arc. The Housing Market Assessment for the area shows there is a large un-met demand for affordable homes [ viz. 611 pa in Dacorum alone], especially at Social Rents: the proposals to build the current target of 922 pa. homes will result in huge releases of Green Belt land in this area, yet still not meet the need for homes that are affordable by local residents. The electorate is unlikely to regard this as a trade-off that is justified.



### **Democratic accountability**

The proposal appears to limit local engagement to the Plan Making stage only [with a variation for Neighborhood Planning]. We consider this an undesirable loss of democratic engagement, as being the First Tier of Local Government, local Councillors and their residents will have better knowledge of local impact than a more distant Planning Officer. There is a case to retain engagement of the community at the Master Planning stage post the Plan adoption, and when parcels come forward for development. ***Proposal 5 is silent on engagement with residents on these matters.***

We assert that First Tier Councils as statutory consultees should retain the right to comment on householder applications.

### **Infrastructure, S106 and Infrastructure Levy**

While it is desirable to re-visit how planning gain can be captured, and we welcome the aspiration in Para 4.5/4.6 of Pillar 3, it is unclear how the details will be applied or what are its improvements on the prevailing S106/Community Infrastructure Levy measures. We also question whether 'one size fits all' or a uniform country wide levy is the proper basis to reflect the very different conditions that exist across the realm.

Your advisers will be mindful that... "S.106 agreements not only secure the delivery of numerous development obligations but it also provides contractual arrangements for other aspects of development, without which development could not be approved. These are not superfluous arrangements stymying development, they are necessary, in law, to make development acceptable and critically to facilitate it whereas it might not otherwise proceed." (*Response to consultation by Dacorum Borough Council*)

We restate our Borough's wish for the NPPF to retain [and strengthen] the proportion of affordable homes to be delivered as it removes developer uncertainty on their obligations.

### **Sustainability**

We look to the Ministry to strengthen the NPPF to ensure areas designated for Growth are selected to provide easy access to local employment. The alternative is to add dwellings to towns and villages where increased numbers need to out-commute for employment which will add to congestion and degrade air quality.

Yours sincerely

A handwritten signature in black ink, appearing to read "Tony Noakes".

Tony Noakes  
Town Clerk  
Berkhamsted Town Council