

This requires your prompt action, PLEASE, to help protect Greenspaces!

Planning Consultation 2020: 'Changes to the current planning system.'

Deadline for Responses is 1st October 2020. This can be done by a simple email and copied to your Local Councillors and MPs. Brief Notes are given below: The **LINK** to the full Consultation Document is: www.gov.uk/government/consultations/changes-to-the-current-planning-system

Respond by Email: TechnicalPlanningConsultation@communities.gov.uk or **Online** using the above LINK.

This Consultation sets out proposals for measures to improve the effectiveness of the current planning system. The 4 main proposals are:

- *changes to the 'standard method' for assessing local housing need (additions to Housing Stock);*
- *securing 'First (Starter) Homes' through developer contributions ahead of a new system;*
- *supporting small and medium-sized builders (SMEs) by temporarily lifting the small sites' threshold below which developers do not need to contribute to affordable housing; and*
- *extending the current 'Permission in Principle' to major development.*

The Proposals within this Consultation Document include both **GOOD** and very **BAD** aspects:

The **GOOD: Proposals seek to:**

- *boost Developer Contributions towards 'First Homes' (Starter Homes) and 'Affordable Homes';*
- *support small and medium-sized builders to contribute further to the supply of housing, most often on smaller sites which larger builders ignore but can deliver needed house-types in sustainable locations;*
- *involve the public earlier and wider in Local Plan-making and choosing where development may occur;*
- *Stress both need and opportunity to maximise the use of 'Brownfield' sites and a 'Brownfield-First' policy approach which would lessen the risk of Green Belt and other greenspace release.*

The **BAD: Proposals would:**

- replace the '**standard method**' for calculating the 'NEED' for additional homes (and discredited out-of-date 2014 ONS Data) with an unworkable **algorithm** (formula) distorted by unscientific factors - the higher of 0.5% pa Housing Stock additions or latest projections of households comparing just two years ten years apart (which are unlikely to be representative) plus an inflated adjustment for 'Affordability';
- make the national total exceed by 12% the already arbitrary Target of 300,000 additional homes per annum by working backwards from the Policy Total, which may have made some sense before inward migration collapsed, the Economy contracted, Brexit happened and Covid-19 shattered prospects.
- possibly work at the arbitrary 300,000 figure nationally (as aggregated errors tend to cancel each other) but they certainly don't work at the Local Authority level, neither for the overheated places of "*higher housing pressure*" nor for the areas which require investment and "**levelling-up**" including the cities and towns of the '*Northern Powerhouse*' and others like Wirral, where the real 'Housing Need' is of Regeneration, Replacement and Upgrading of substandard housing, the provision of truly 'affordable housing' (for purchase or rent), smaller and ground floor homes for those wishing to 'downsize' and those with a mental or physical impairment, expanding 'Empty Homes back into use' Programmes, and extendable small 'First Homes' - within improved, sustainable, well-serviced and attractive settings.
- not address extensive 'land-banking' by near-monopoly developer/land owners or the **over one million approved homes capacity currently unbuilt** before releasing more Green Belt and Agricultural land, vital for Food Security, Health and Wellbeing, Wildlife and Habitat Recovery, and mandated Climate Change mitigation. Wildlife is not considered at all, nor the protection and potential of Heritage assets.
- extend '**Permission in Principle**' from sites of less than 10 houses up to those of 150 houses in one leap, with no intermediate step/review. This, coupled with a low requirement for up-front information from Applicants (not even initial surveys) and insufficient time and opportunity for scrutiny and public involvement, risks ecological destruction, inappropriate development, project delays and public dismay.

The existing Planning System needs improvement but these Proposals are ill-thought-out, ignore available best science, data and advice, target the wrong culprits ... and will certainly fail.

For and on behalf of **ITPAS** (Irby, Thurstaston & Pensby Amenity Society) and **WGSA** (Wirral Green Space Alliance)