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**Our Ref: Planning for the Future - consultation**

**Date: 28 October 2020**

Dear Sir/Madam,

Thank you for the chance to comment on 'Planning for the Future'.

We are keen to make general comments on the proposals expressed in 'Planning for the Future', in addition to responding to the more specific consultation questions raised in the document. The consultation response below was developed in conversation with our elected members and also captures the views of officers on the front line dealing with Local Plans and planning applications.

We welcome this Planning White Paper consultation as a concerted attempt to tackle serious problems. There are not many that would argue that there aren't problems with the current planning system and the delivery of homes to meet housing need and affordability are key issues the Government should clearly be trying to address. In fact 'Planning for the Future' correctly identifies many of the problems with the planning system that need addressing.

The proposed solution at the heart of the Government's reform, the new approach to the Local Plan, has had mixed reviews. However, at its most positive the focus on good up-front spatial planning has great potential; front-loading consultation with a more strategic overview (rather than dealing with sites on a case by case basis). The Liveable Exeter programme gives Exeter City Council a really strong platform to work with these changes – a strong vision for those areas zoned for growth as well as the wider plan area, is key. We have already embraced the need for growth, and with a clear spatial approach to landscape, biodiversity, green infrastructure we have the potential to make a strong business case for unlocking the potential of zoned areas. If the value of growth is recognised there is an opportunity make a business case for the infrastructure and to masterplan for its delivery (borrowing and then clawing this back through the Infrastructure Levy). However, this does require a genuinely plan led system, time and resource to undertake spatial planning and consultation, together with a fundamental culture change.

Some of the other solutions proposed in 'Planning for the Future' could be seen as offering efficiency savings and greater consistency of working that could benefit the development industry (as well as offering potential resource saving for LPAs). Standardisation of approach between authorities, templates for submissions, reducing superfluous documentation, greater use of technology and digital plans, and the introduction of national Development Management policies, all offer potential in this regard.

It is also encouraging to see a continued focus on good design and indeed the proposals for design codes and a 'chief place maker' position could all be supported if resources were available to enable delivery. However, there is currently no information as to how such resources will be made available to already stretched Council budgets.

Many in the development industry will welcome the prospect of a simple flat rate CIL and most would probably agree that the current Community Infrastructure Levy and S106 planning obligations systems are not always delivering the sustainable communities that are needed. However, the prospect of a one-size fits all nationally set levy, is of significant concern to us and it remains to be seen whether the new Infrastructure Levy can overcome the challenges that have beset efforts to capture land value uplift since the 1940's. The detail of how this will work needs to be clearly set out and workable.

There is also little clarity on the process by which infrastructure itself will be delivered. If CIL revenue does not rise, there is little hope of delivering the sustainable communities that the Government promotes. Furthermore, the suggestion that the new Infrastructure Levy would be set nationally, without reference to local factors including land values, suggests a fundamental lack of understanding of the issues. Equally the proposal for the new Levy to deliver affordable homes through off-site financial contributions, which rarely delivers those units as quickly as those provided on site, raises concern in an area where affordable homes are much needed.

The Duty to cooperate would be removed according to the consultation, but nothing has yet been proposed to replace it; strategic infrastructure provision is key to delivering growth and yet this issue is left open. And whilst a new front loaded Local Plan system does have the potential to provide a strong spatial approach, there is in fact little mention of the need for a strong spatial strategy in the consultation documents. As such it is difficult to be anything but dubious about how such changes will be of benefit to the communities we serve without knowing greater detail as to how these changes would be implemented and provide a genuine improvement in the current arrangements.

Further fundamental concerns arise in relation to proposals for planning permission to be granted automatically, without public consultation or member involvement; and a timetable for Local Plan production that offers little scope for consultation or engagement. These changes, together with Development Management policies being prescribed nationally, and the standardisation of policies and approach, seems to herald a move away from democratic accountability and perhaps the end of Localism. This is not considered to benefit local communities and flies in the face of the Skeffington Report 'People and Planning' (1969) which stated "we believe that the growing interest in participation (by the public) is a valuable new development....." That view remains the situation today, if not more so, and it is vital that local people have the ability to contribute their ideas and views when plans and proposals are being developed in their local area.

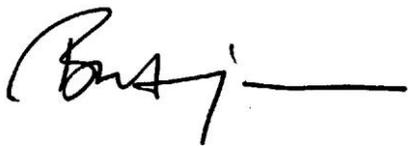
Exeter, together with many other local Authorities, have declared a Climate Emergency and is focusing its efforts on addressing this. However, you will find little mention of this in the Government's consultation and it seems that the planning system will have no real part to play in setting the new energy efficiency standards (which will, according to the consultation, be implemented through Building Regulations) preventing the Council from seeking higher standards as part of policy-making and decision-taking. Furthermore the Building Regulations proposals lack ambition in relation to reduction of carbon emissions (only seeking a 75-80% reduction in CO2 emissions by 2025). This does not fit with Exeter's ambition to be carbon neutral by 2030. The proposals could also weaken environmental protections, will not reverse nature's decline and fail to integrate nature into people's lives. This consultation appears to miss an important opportunity to identify ways in which LPAs and the Government can respond effectively to the climate and ecological crises.

The overhaul of the planning system offers significant potential to deliver improvements and even some of the negatives, discussed above, could, with greater clarity, be turned into positives. But everything is in the detail. So much detail is missing at this stage that it is difficult to make definitive judgements and to see all the changes in positive light at this juncture.

Perhaps the greatest uncertainty at present is whether the changes, when seen together, will result in good, well designed, sustainable development which will provide for the needs of the local community. Without a package of changes that sells itself in this regard, advocates of the new system will be in a minority.

The above comments are intended to offer a balanced assessment of the 'Planning for the Future' and suggestions are made to positively enhance the proposals. We are hopeful that you will take on board the views expressed above in determining how to go forward. We would be grateful if you could acknowledge receipt of this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Bindu Arjoon', followed by a horizontal line extending to the right.

**Bindu Arjoon**  
Director for City Development, Housing and Supporting People  
Exeter City Council