



PUBLIC INVOLVEMENT

- and how the planning white paper would undermine it

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The Smart Growth UK Principles 2007

Plan Compact Communities - Smart Growth promotes well-designed, compact, functional communities and rejects land-hungry sprawl and wastage of greenfield land.

Strengthen and direct development towards existing communities - Smart Growth emphasises use of communities' existing infrastructure and resources and conserves open space and urban fringes.

Provide sustainable transport choices - Smart Growth reduces dependence on road transport and increases opportunities for walking, cycling and public transport. Towns, cities and villages should be pedestrian-friendly and rail-accessible.

Protect the unbuilt environment - Smart Growth believes our countryside and open space is a precious environmental, social and economic resource. It should be protected and husbanded if we are to move towards a more sustainable society. Squandering it will create, not solve, problems for our towns and will do nothing for our national economy.

Foster distinctive, attractive communities with a strong sense of place - Smart Growth encourages communities to develop their own identity and vision, respecting their cultural and architectural heritage. It supports human-scale development and opposes large, monolithic developments, out-of-town retailing and "big box" architecture.

Mix land uses - Smart Growth supports a sensible mix of land uses to suit communities and which meet their daily needs.

Encourage communities to flourish and grow - Smart Growth supports mixed-income, mixed-age, inclusive communities that take responsibility for their own development. Local economies should be developed to make them more self-supporting.

Create a range of housing opportunities and choice - Smart Growth supports quality living for people of all income groups, ages and needs. We want human-scale development at appropriate densities to support sustainable transportation and local facilities.

Make development decisions fair and economically inclusive - For communities to successfully implement Smart Growth they must ensure all three sectors of the economy – public, private and community - function successfully and sustainably.

Executive summary

The planning white paper starts from the standpoint that community participation is a weakness of the system and, despite fine words, would mostly eliminate it. We believe, however, that democratic elements are a source of strength and legitimacy (Section 1).

The white paper mostly reduces the right to be heard to the first stage of local plan preparation, planning applications in “protected” areas and a handful in “growth” or “renewal” areas. (Section 2)

The proposals have come about after some years of urging by “think-tanks” (Section 3).

Communities already find it hard to make their voices heard at the plan-making stage; the white paper would reduce that further (Section 4).

The three proposed zones are obscurely designed, dysfunctional and would mostly exclude the public from serious decision making (Section 5)

Ways need to be found to make local plan making more participative (Section 6).

The white paper would shift English planning to a more “regulatory” system, but the one proposed would be inflexible and undemocratic – although it could easily be used one day to impose standards that are more restrictive than the current system (Section 7).

Attacks on the planning system as “Soviet” have evidently impressed the Government, yet enhanced public participation will be needed to tackle the climate and biodiversity emergencies etc. (Section 8).

We recommend it be scrapped and a new white paper setting out how to modify the planning system along Smart Growth lines be prepared in its place.

1. Introduction

The prime minister introduced the Government's white paper plans to change the planning system by expressing an ambition to create a system: "that gives you a greater say over what gets built in your community".

In his own Foreword to the white paper, communities secretary Robert Jenrick promised that: "communities will be reconnected to a planning process that is supposed to serve them, with residents more engaged over what happens in their areas."

The white paper itself claims to want to "move the democracy forward in the planning process and give neighbourhoods and communities an earlier and more meaningful voice in the future of their area as plans are made".

These are admirable objectives and we share them. Where we lack confidence, however, is whether the reforms proposed in the white paper would secure them. Indeed, it actually complains about public involvement: "Consultation is dominated by the few willing and able to navigate the process," it says (1.3). This is, actually pretty obvious; people unwilling and unable to participate are unlikely to do so.

In fact we believe the white paper starts from the standpoint that public participation is a weakness of the planning system and people should mostly be excluded from the planning process.

We believe, on the other hand, that participation, the democratic elements of the planning system implicit since its creation in 1947, are a source of great strength and legitimacy. Reducing them is a perfect recipe for stimulating conflict and public opposition.

2. How the white paper would limit democratic involvement

The white paper sets out a belief (1.16) that change is needed because consultation: “adds delay to the process and allows a small minority of voices, some from the local area and often some not, to shape outcomes”.

Yet bizarrely, the same paragraph begins with an ambition that: “Local councils should radically and profoundly re-invent the ambition, depth and breadth with which they engage with communities as they consult on local plans. Our reforms will democratise the planning process by putting a new emphasis on engagement at the plan-making stage”.

How would this work? “Communities will be able to trust the planning system again as their voice will be heard from the beginning of the process and better use of digital technology will make it radically easier for people to understand what is being proposed in their neighbourhoods and provide new ways to feed their views into the reformed system,” it says (1.28). “Local plans will be developed over a fixed 30-month period with clear engagement points, rather than the current inconsistent process which takes seven years on average.”

There is, perhaps, some justification in the white paper’s view (2.3) that: “Layers of assessment, guidance and policy have broadened the scope of local plans, requiring a disproportionate burden of evidence to support them. As a result, local plans take increasingly long to produce, on average over seven years; have become lengthier documents of increasing complexity, in some cases stretching to nearly 500 pages; are underpinned by vast swathes of evidence base documents, often totalling at least ten times the length of the plan itself, and none of which are clearly linked, standardised, or produced in accessible formats; and include much unnecessary repetition of national policy.”

The Government appears not to remember that an unspoken motivation for introducing such complexities to the local plans system in the early 2000s was to make them more opaque and hard for the public to get involved in. Anyone who has been involved in the complex and tortuous process of their formation will confirm that has been successful.

Again, the white paper’s ambitions (2.5) that local plans should be transparent, communicate information clearly, use clear and efficient processes and re-engage with local communities: “so that more democracy takes place effectively at the plan-making stage” are ones we would support. But it quickly makes clear that public involvement is not intended to take the holistic view that effective planning demands but that: “Local plans should have a clear role and function, which should be, first, to identify land for

development and sites that should be protected; and, second, to be clear about what development can take place in those different areas so that there is greater certainty about land allocated for development and so that there is a faster route to securing permission" (2.7).

So public involvement would be restricted to issues about which areas of land would have to be released for development in such a way that would give developers "greater certainty" and hence, inevitably, communities less right to be involved. The rest of Section 2 of the white paper explains how this undemocratic certainty would work.

The key is that "faster route to securing permission". As Mr Jenrick says in his Foreword: "Our proposals seek a significantly simpler, faster and more predictable system". That ambition would cut into the heart of the way the public has been involved since planning was introduced. If decisions became more predictable, the public's right to influence them would be reduced.

"Planning decisions are discretionary rather than rules-based," the white paper complains (1.3). "Nearly all decisions to grant consent are undertaken on a case-by-case basis, rather than determined by clear rules for what can and cannot be done. This makes the English planning system, and those derived from it, an exception [*sic*] internationally, and it has the important consequences of increasing planning risk, pushing up the cost of capital for development and discouraging both innovation and the bringing forward of land for development. Decisions are also often overturned. Of the planning applications determined at appeal, 36% of decisions relating to major applications and 30% of decisions relating to minor applications are overturned."

Of course, the main reason that decisions are overturned on appeal is national policies designed to limit local decision-making, such as the five-year housing land supply. But rather than seeing this as the sign of healthy community involvement, however, the white paper goes on to attack the whole right of people to get involved in individual planning consents.

3. Why does the Government want to limit involvement?

That attack on communities' right to be heard on planning has been gathering strength for some years, egged on by a public relations campaign paid for by the extremely wealthy property and development industries and by similarly well-funded "free-market think-tanks".

A paper called *Open Source Planning*¹ was prepared prior to the 2010 election and guided the new Government's policies on planning. Among a large number of recommendations was a proposal to shift the current local plan and development control system to one based on much simplified local plans under which whole classes of development would no longer need planning permission, so removing much public involvement. Although local plans were supposed to reflect local views, it was made clear they would have to be in accordance with national guidance and the idea that, if an up-to-date local plan were lacking, planning consent would be automatic if it met national standards, thus proposing the entirely misnamed "presumption in favour of sustainable development" which has done so much to limit community involvement in many areas.

Open Source Planning did propose measures to reduce the discretionary element of planning through development control, but was careful to suggest public involvement would be maintained through compulsory consultation, although developers would have been able to avoid formal assessment by reaching voluntary agreements with neighbours. Many of the paper's proposals subsequently found their way into the *National Planning Policy Framework*.

Think-tanks have since led the attack on planning, with the Policy Exchange particularly active. A paper in January 2020 co-authored by its head of housing Jack Airey called *Rethinking the Planning System for the 21st Century*² claimed that planning is: "part of a government programme to establish a command-and-control economy" and that: "these principles are wholly out of sync with the needs and desires of people, businesses and wider society". The "people" cited, however, were not necessarily those in local communities affected by development proposals.

"The planning system has been captured by the 'noisy minority'," the paper complained. "Low turnouts in local elections and the demographic of voters – typically older people and homeowners – means there is an incentive for parties and candidates in local elections to run on anti-development policy platforms. Unless they have the time and patience to attend local planning committees, ordinary citizens are detached from the planning process."

The Policy Exchange demanded that a binary land use planning system be introduced, zoning all land for major development or minor development. Local plans would be hugely simplified and development control reduced to implementing the local plan rules. Local politicians' role would simply have become voting in favour of the local plan; they would have had no role in deciding applications. The public would have been largely excluded, as would community groups.

"Taking forward reforms of the kind proposed will provoke opposition from certain lobbyist groups, for instance those who say they speak for the countryside" warned the paper. "The Government should, nonetheless, be resolute in a bold programme of planning reform."

Many of the proposals have found their way into the white paper, unsurprisingly perhaps as Mr Airey, the report's co-author, is now a Government advisor³ involved in the planning proposals.

Some of the white paper's specific proposals may have been prompted by research in a book called *Neighborhood Defenders*. This has been cited by the Centre for Cities think-tank as the definitive piece of research about how house-building is, allegedly, prevented.

There are many reasons why the Government should not rely on this book. The research in *Neighborhood Defenders* has nothing to do with the English planning system, nor is it wide-ranging; it looks at exceptions to the zoning rules in urban Massachusetts. Its finding is that those who oppose exceptions to zoning are unrepresentative of the population. However, the book's recommendation is not to remove public participation from the planning application stage.

The researchers' agenda is housing-at-all-costs (build, build, build...). It is assumed that beleaguered, unfortunate developers are prevented from going about their role of solving the housing affordability crisis by "pale, male, stale home-owners" - the "neighbourhood defenders" of the title. There is, however, no separate research into the diversity of developer boards nor of those who create policy.

The book pays only lip service to the fact that enhanced public participation was introduced in the United States precisely so that developer excesses could be checked. Neighbourhood defenders have legitimate concerns; in reality, they are citizen participants with valid interests, seeking a lawful, and perhaps the best, outcome for their areas and extracting legitimate concessions from developers. If proposals breach land regulations or are likely to cause traffic, environmental or flooding problems (the most frequently cited concerns), then they *should* be challenged.

In the book, however, "neighbourhood defenders" are portrayed as averse to change, adding costs to developers' proposals, delaying and preventing housing and 'using their incumbent advantage to exclude others'.

In two instances cited in the book, a seemingly good outcome for all involved was seen purely through the lens of blocking housing. In the first case, following community participation, an unsuitable development proposal was changed. The result was the preservation of an historic setting, the placing of parking underground, the inclusion of 36 affordable units and the inclusion of some green space. The second case involved a community who requested a vote about the town buying an estate, valued for its open space and woodland; it was successful.

The authors make no acknowledgement that in these cases issues other than housing were, rightly, given high importance. Neighbourhood defenders were deemed to be simply blocking housing.

Despite the admission very late in the book that: “An unchecked pro-growth orientation comes with serious environmental concerns”, it is clear that the authors are, to a great extent, of the belief that housing at all costs is the answer to the housing crisis. There is only token acknowledgement that there should be distinct goals for market housing and affordable housing, that market-rate housing may not help the delivery of affordable housing and that in many cases new housing displaces poorer residents.

The authors also note a clear distinction (and conflict) between “YIMBYs”, who support any new housing, and “PHIMBYs”, who are affordable housing advocates supporting public housing. YIMBYs are no more socially inclusive than neighbourhood defenders and in some cases conflict with tenant groups, who fear gentrification and seek to keep existing tenants in one place.

The authors propose three solutions (for Massachusetts):-

1. Include and consider all views for a durable and impactful result;
2. Lay out in advance what a developer is required to do – traffic surveys, drainage reports, wildlife surveys etc.;
3. Modify zoning regulations. Zoning is the problem, not the opposition to specific projects for legitimate reasons. Project-by-project involvement is different from a city-wide re-zoning.

The authors say affordable housing will need federal intervention and funding and the book provides a stark warning. In cases where people have no other way of raising legitimate concerns, the number of law suits may increase; in one area of Massachusetts such litigious action was actually provoked.

The planning system was set up, *inter alia*, to control developer excesses and it should be used to do that, by enhancing opportunities for involvement. Those who interact with the system should not be patronised and dismissed, and nowhere do the authors of *Neighborhood Defenders* recommend preventing public participation. This one, narrow, piece of research of the American system should not, in isolation, inform Government policy.

4. Would communities get more involvement at the local plan stage?

The Government, in *Planning for the Future*, says it has an ambition to improve community engagement at the plan-making stage.

“We are moving away from notices on lamp posts to an interactive and accessible map-based online system – placing planning at the fingertips of people,” says Mr Jenrick in his foreword to the white paper. “The planning process will be brought into the 21st century. Communities will be reconnected to a planning process that is supposed to serve them, with residents more engaged over what happens in their areas. While the current system excludes residents who don’t have the time to contribute to the lengthy and complex planning process, local democracy and accountability will now be enhanced by technology and transparency.”

The white paper agrees: “As we bring in our reforms, local planning authorities are equipped to create great communities through world-class civic engagement and proactive plan-making,” it says (1.16), so local plans can: “benefit from a radically and profoundly re-invented engagement with local communities so that more democracy takes place effectively at the plan-making stage”.

Those who have been involved in local plan development and consultation may well agree that to: “support open access to planning documents and improve public engagement in the plan-making process, plans should be fully digitised and web-based following agreed web standards rather than document based” (2.44). This would, however, mean that those who are not computer-literate or unable to use a smart-phone should be excluded from even this part of the planning system. Currently, although alert systems exist and council websites list applications, it requires some degree of effort to keep up. What is proposed? Are local authorities going to bombard residents with emails and links? Or would they expect communities to seek them out themselves? A vital role of “neighbourhood defenders” is spreading the word to communities.

Although the ambitions sound fine, in practice how would local planning authorities be forced to engage instead of consulting and, all too often, ignoring? All too often, their approach is “decide, announce, defend” (DAD). This is then often followed by “abandon” (DADA).

A classic example of DADA was the North Essex Garden Communities project. Some years ago, a small group of councillors decided that north Essex needed three new towns. All legitimate concerns were ignored, proposals were defended but never amended, millions of pounds of tax-payers’ money was wasted and delays to the local plan resulted in speculative developers making hay. In the end, the £8 million delivery

vehicle was mothballed and the two biggest new towns were found undeliverable by the Planning Inspectorate.

During the consultation, thousands of residents submitted detailed and analytical responses, several times. Many attended “engagement” events more akin to brainwashing sessions, and were lectured or shown videos about the benefits of new towns. At one they were even told to set aside their dislike of the new town and to put 20,000 homes on a map. Council drop-in events involved minimal or incorrect information. One map showed 1,250 homes when 24,000 were proposed. It is astonishing to think that this type of engagement might be the one and only opportunity communities get to have their say under new proposals.

Similarly, in Eastleigh, the Council proposed a joint venture scheme of 6,300 dwellings (and a new road crossing the River Itchen SAC). Despite opposition to this site in the first public options consultation outweighing support by 98% (eight in support, around 700 against), the council persisted in moving to a second consultation with its proposals, seeing opposition not just now from local residents, but over 20 national conservation bodies and charities. Notably at the first consultation stage other alternative sites did not receive anything like the same level of objections. Subsequently the proposed plan was found unsound at examination. It would not have been possible for the group involved to have prepared an evidence-based case (which proved successful) if there had only been one stage of consultation.

So a principal concern must be the irreversibility of far-reaching decisions taken too early in the planning process. It takes a long time for a broad enough section of the local community to latch on to realisation that a massively important planning decision for their area is about to be taken, by which time most of any “front-loaded” consultation period would be over. Even if the decision looks increasingly misplaced as time goes by (because of constraints becoming known or changes in mood, policy or economic circumstances), the steamroller would be unstoppable and the process would continue to the bitter end.

5. Would the “new approach” help public participation?

The white paper proposes that land use plans should be “simplified” (Proposal 1) and local plans would identify three types of land: “Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected”.

As our accompanying report⁴, *Constraints to Development – What the Planning White Paper Should Have Said* makes clear, the constraints on development identified by the white paper and the protections it proposes to offer are grotesquely inadequate. But it is also clear that once the three types of area are defined in a local plan and, once it is adopted, the public would mostly be stuck with it.

True, paragraph 2.8 which defines the three areas says that, in “protected areas”, the local plan would define “what is permissible”. Development proposals (2.35) would come forward as now through planning applications to the local planning authority. Here presumably, the public would still be allowed to object, except where their rights had been destroyed by permission-in-principle or development orders.

But in “growth” or “renewal” areas, planning applications would only be needed where an application differed (not defined) from the local plan. “We expect this to be the exception, not the rule,” it says (2.34). Otherwise developments in “growth” areas would have outline planning consent automatically and detailed consent would be secured by a reserved matters process, local development orders or development consent orders. In “renewal” areas, consent would be secured through automatic consents for certain types of building, a faster application process determined by the local plan, or by local or neighbourhood development orders.

Only in cases where proposals differed from the plan in growth or renewal areas would specific planning consents be required (2.34). Otherwise the local community would be reduced to pressing their noses against the town hall windows, as hamstrung planners rubber stamped major and minor applications that hugely impacted their lives.

So, given the fundamental difference between growth and renewal areas and protected areas, we might have expected clarity from the white paper on how growth, renewal and protected areas are defined.

Renewal areas are perhaps the clearest, as they would be “existing built areas”, apart from small parts of: “rural areas that is not annotated as growth or protected areas, such as small sites within or on the edge of villages”. Other than that it is clear that all greenfield land would be either in a growth area or a protected area.

Given that very different planning policies would apply in growth and protected areas, it is astonishing that the white paper is so vague as to what would constitute a growth area, and what wouldn't. How would a growth area be defined in a local plan, so its greenfield land would be available for a development free-for-all? And how would that change over time?

- (1) The local plan decides which major greenfield sites are developable over the next 10 (or maybe five) years and then designates them as growth areas. More areas are then added at each five-yearly review; or
- (2) The local plan takes a long-term view on the total areas of the local planning authority's greenfield land that would be suitable for development over the foreseeable future, designates it all as a growth area, defines which sites within that area enjoy outline planning consent in the coming five years and then gradually consents more of it every five years thereafter?

The two are very different, but no-one apparently is sure what the white paper means. If

(1) we'd have a system where there's a call for sites, the LPA decides how much of the offered land it needs and is not constrained and then defines that as its growth area. All greenfield land not in the growth areas defined in the first new-style local plan would then become a "protected area". Then, at the next review at the end of five years, the council would look at which sites developers had chosen to develop, issue a fresh call for sites and top the growth area up with new sites to fulfil its housing requirement by mining the protected area. The protected area would thus shrink significantly every five years (and substantially in areas under intense development pressure), giving a whole new meaning to the term "protected" and fuelling conflict by communities who would watch the percentage of their area that was theoretically "protected" shrinking fast twice every decade.

Option (2), on the other hand would mean LPAs having to define which (very substantial) proportions of their countryside would be destroyed by development in the long-term.

Both these offer virtually no opportunity for community involvement beyond the usual rows at local plan examinations which the white paper expects to be extremely limited and eventually ruled over by central government. The local plan process would also generate intense debate between land owners anxious to secure the huge financial uplift that planning consent offers their land, turning the local plan process into a land grab process.

If those who drafted the white paper seriously believe any of this is a recipe for community acceptance and reduced public debate, they are sadly deluded.

6. How could local plan making become more participative?

Councils could and should instead be required to follow a collaborative, adaptive approach. This would mean: “active involvement and transparency of all stakeholders or those affected by a particular development project. Adaptation is necessary when there is scepticism or difficulty arising from a particular project.” This can also be described as “Engage Deliberate Decide” (EDD).

The point is that communities need to be asked what their needs, wishes and concerns are at the start whereas presently there is a call for sites from developers, a recipe for disaster. Outcomes need to be discussed and changes to proposals made. The decision should come at the end, not the beginning.

Neighbourhood plans take this approach. Communities come together to discuss the future of their neighbourhood. A referendum is held. The referendum must inform the creation of the neighbourhood plan. This could be scaled up to local plan level.

Given how much more important engagement in plan-making would become if the changes in *Planning for the Future* came about, the system should have to enforce a participatory approach. Here are three ways it could do that:-

1. **Referendums:** Local planning authorities should be obliged to hold a referendum at one of the early stages of local plan-making and be obliged to demonstrate to a planning inspector that they have taken the results into account when forming the plan
2. **Duty to engage:** One of the legal checks at examination must be a ‘duty to engage’. Stakeholders should be asked (as they are now about the duty to co-operate and soundness tests) if the planning authority has engaged properly and, if not, say why. Plans should not proceed if there is evidence that planning authorities have bulldozed their proposals through, ignoring concerns.
3. **Citizens’ assemblies:** Another possibility might be the new opportunities offered by citizens’ assemblies.

7. The regulatory elements – a double-edged sword

The white paper is disparaging about planning's discretionary elements, saying it makes it too complex. "The planning system we have today was shaped by the Town and Country Planning Act 1947, which established planning as nationalised and discretionary in character," it says (1.3). "Since then, decades of reform have built complexity, uncertainty and delay into the system. It now works best for large investors and companies, and worst for those without the resources to manage a process beset by risk and uncertainty. A simpler framework would better support a more competitive market with a greater diversity of developers, and more resilient places."

There is very little effort here to disguise the fact that the Government's main concern is developers while the communities count for little. Planners are to be railroaded into supporting this.

"In particular, we envisage the focus of local planning authorities shifting 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," it says (5.14). "In doing so, there is a real opportunity for planners to redesign their individual roles and change perceptions of their profession. We will consider how best to support the planning profession in making this adjustment, in a way which supports culture change, improves recruitment and changes perceptions of planning."

The Government is not – yet – proposing to eliminate all individual planning consent processes. But much of the right to object would go and, central to this process, is the proposed zonal system (2.8).

In "growth areas", outline consent would be granted for the principle of development by adoption of the local plan, plus streamlined consent routes (2.31-2.32) using reserved matters processes, local development orders or development consent orders.

In "renewal areas", there would be a presumption in favour of development and many pre-specified forms of development would have automatic consent, while there would also be local or neighbourhood development orders and only in other cases would there be a faster application process "where a planning application for the development would be determined in the context of the local plan description, for what development the area or site is appropriate for, and with reference to the *National Planning Policy Framework*" (2.33). Including the rather vague rural sites on the edge of villages would mean that large numbers of developer-proposed sites (omission sites) would also fall under the have presumption in favour.

In “protected areas”, the existing system of individual applications would be used, although even here, permitted development rights and development orders would undermine the right of people to get involved in the system (2.36).

So, as a general rule, only in protected areas, or a few cases in renewal areas, would people have any right to object to a development once the local plan gave it the go-ahead. This would massively reduce communities’ rights to be involved, yet the Government hasn’t really twigged that actually this could also place substantial obstacles in the way of many developments.

“In both the growth and renewal areas it would still be possible for a proposal which is different to the plan to come forward (if, for example, local circumstances had changed suddenly, or an unanticipated opportunity arose), but this would require a specific planning application,” it says (2.34). “We expect this to be the exception rather than the rule: to improve certainty in the system, it will be important for everyone to have confidence that the plan will be the basis for decisions, and so we intend to strengthen the emphasis on a plan-led approach in legislation (alongside giving appropriate status to national planning policy for general development management matters).”

In the modern world, circumstances change rapidly. Even in the unlikely event of the white paper achieving its ambition that local plans should be wholly revised at least every five years (2.51), there will always be endless cases where people would want to pursue developments at odds with the plan. Yet they would be faced with a monolithic and unresponsive system where such developments would be actively discouraged by the very local plans that were supposed to guarantee “flexibility”.

The Government has failed to realise that a move such as the one it proposes to a regulatory, rather than a discretionary, system would actually militate against the flexible system it hopes to create, although it would certainly exclude community participation. And although it might create such a system designed to be as *laissez faire* as possible towards commercial developers, such a system could, one day, easily be tightened when more responsible national policies were implemented. Indeed, it could just as easily be used to clamp down on development as it could be to facilitate it.

8. Conclusions

The planning system created in 1947 was not, as the Policy Exchange claims, “part of a government programme to establish a command-and-control economy” but an attempt to introduce a measure of community control over elements of their physical environment that had profound effects on those communities and to protect our environment for everyone. But the pressure from commercial interests in building, land and property has continued relentlessly for decades, attempting to wrest control over our environment so that they can profit from its degradation and destruction. Just recently the jibes have gone beyond the “command-and-control economy” to insulting planning by comparing it to the former Soviet Union, a political regime that deliberately murdered tens of millions of people. That is the level the attacks have sunk to, and it is hard to believe that any responsible politician would listen.

But, to a significant extent, the attacks have succeeded. Yet as the climate and biodiversity emergencies gather pace and our economy reels from a pandemic and other shocks, planning’s guidance and protection have never been needed more. To introduce measures designed to shift most of its power to volume house builders is a ludicrously irrelevant and destructive proposal at this time.

To secure the urgent changes we need in the way we manage our physical environment such as transit-oriented development, more appropriate residential densities, sustainable transport, protection of biodiversity, food production, the water environment, house building for need rather than greed, etc., will require public acceptance. A clear part of that will be ensuring public participation in both regulatory and discretionary elements of planning. The white paper secures none of this, but degrades much.

The planning white paper is called *Planning for the Future*, yet it would seriously hamper our ability to plan for the future, apart from the future of volume house builders’ income streams.

We recommend it be scrapped and a new white paper setting out how to modify the planning system along Smart Growth lines be prepared in its place.

References

¹ *Open Source Planning* [London: Conservative party, April 2010]

² Jack Airey and Chris Doughty: *Rethinking the Planning System for the 21st Century* [London: Policy Exchange, January 2020] <https://policyexchange.org.uk/wp-content/uploads/Rethinking-the-Planning-System-for-the-21st-Century.pdf>

³ Ben Quinn: *Jack Airey: The Tory Aide at Centre of England's Planning Overhaul* [London: The Guardian, 5 August 2020] <https://www.theguardian.com/politics/2020/aug/05/jack-airey-aide-helped-build-red-tape-bonfire-england-planning-policy>

⁴ *Constraints to Development – What the Planning White Paper Should Have Said* [London: Smart Growth UK, October 2020] [http://www.smartgrowthuk.org/resources/downloads/Constraints to Development Report.pdf](http://www.smartgrowthuk.org/resources/downloads/Constraints_to_Development_Report.pdf)