

**Public consultation response:**  
“Planning for the Future”

**To:** Ministry of Housing, Communities and Local Government

**By:** The Intergenerational Foundation

**Date:** 29 October 2020

The Intergenerational Foundation ([www.if.org.uk](http://www.if.org.uk)) is an independent think tank researching fairness between generations. IF believes policy should be fair to all – the old, the young and those to come.

**Introduction**

The Intergenerational Foundation (IF) is pleased to have the opportunity to respond to the public consultation on the reforms to the planning system which are proposed in the government’s “Planning for the Future” white paper.

Since it was formed in 2011, IF can claim to have played an important role in leading the debate about intergenerational fairness in the UK – particularly with regard to the housing crisis, which has been one of our major areas of work – and we are regularly consulted by the media and policy-makers to give our expertise on this issue.

Overall, IF is in favour of many of the ideas which are included in the white paper, and we strongly agree with the overarching aim that young people should be able to enjoy the same levels of homeownership which previous generations were able to enjoy.

However, there are a number of specific points which we would like to raise in relation to some of the ideas which are mentioned in the white paper:

**1) The Green Belt is left untouched**

The proposals within the white paper appear to take an extremely conservative stance on protecting land which is already under some kind of protected designation, including potential development sites within the Green Belt or urban conservation areas: *“valued green spaces and Green Belt will continue to be protected for future generations, with the reforms allowing for more building on brownfield land.”*

It appears from the details which are provided in the white paper that it is likely that all of the land which currently carries some kind of protected designation will pass straight into the new category of “Protected” areas that local plans will be required to designate. That would mean it will be no easier to build new

homes on land which is currently protected, and it may even become more difficult, for example if local authorities designate all land which isn't categorised as either a "Growth" or "Renewal" area as "Protected".

IF believes that this represents a missed opportunity to review the effectiveness of the Green Belt as a means of protecting the natural environment, and to reevaluate the trade-off between protecting green space and enabling new housing development. The Green Belt now covers around 13% of all of England's land, compared to only 2.3% which is covered by urban areas, and research has demonstrated that over a third of Green Belt land is used for intensive agriculture which may actually be harmful to biodiversity and the natural environment.<sup>1</sup> Furthermore, by making land within cities more expensive, the Green Belt actually makes it harder to create parks and private gardens, which have been shown to support much greater biodiversity than intensive farmland does (not to mention that public parks are usually fully accessible to the general public, unlike most of the Green Belt).<sup>2</sup>

Research has repeatedly shown that the existence of the Green Belt has artificially inflated property prices, particularly in London and the South East, which has contributed to the housing affordability crisis facing young people.<sup>3</sup> Research has also shown that releasing for development small areas of the Green Belt which are close to train stations could create almost 1.5 million new homes in England while having very little impact on biodiversity.<sup>4</sup>

It seems unlikely that the UK's problem with the undersupply of housing can ever genuinely be solved unless reforming the planning system includes a meaningful review of how we protect green space and what that protection is attempting to achieve, which are questions that the white paper currently ignores.

## **2) "Democratic engagement" needs to include young people**

A key theme of the white paper is the need to make the planning system more accessible to local communities and more democratic, particularly by using digital technology to make it easier for them to contribute to the development of local plans.

While this sounds good in theory, IF is concerned that it may not be enough by itself to ensure that the young people's views are taken seriously during the formation of local plans. Groups who wish to resist new housing development in their local areas are often well-organised, and have access to the levels of time, money and technical knowledge which are necessary to mount effective resistance.

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<sup>1</sup> Cheshire, P. (2014) *Turning houses into gold: the failure of British planning* London: LSE

<sup>2</sup> Ibid.

<sup>3</sup> Hilber, C. and Vermulen, W. (2016) "The Impact of Supply Constraints on House Prices in England", *Economic Journal*, 126, 591, 358-405

<sup>4</sup> Centre for Cities (2019) *Homes on the right tracks: greening the green belt to solve the housing crisis* London: Centre for Cities

Underpinning the proposals in the white paper which aim to make local plans more accountable to local residents seems to rest on two assumptions: firstly, that a genuinely representative sample of the local population will be willing and able to take part in this process; and secondly, that they will be keener on accepting more development if they have been allowed to play a more active role in determining how and where it should be permitted to take place.

IF would like to point out that local democracy in the UK has historically tended to empower local elites to make more decisions about what is best for the future of their local areas, rather than attracting a range of views which is genuinely representative of the people who live in them. This is most visible when looking at the demographic profile of the people who serve as local councillors in England and Wales: data from the Local Government Association's National Census of Local Authority Councillors has consistently shown that local councillors are usually much more likely to be male, above the age of 50, white and university-educated than average for the population of the areas which they represent.<sup>5</sup> Previous attempts to inject a larger dose of local democracy into the planning process are also not especially encouraging in this regard: research published by the planning consultancy Turley Associates in 2014 found that over half of all the neighbourhood plans which had been submitted to the planning inspectorate since the passage of the 2011 Localism Act had focused on resisting new development.<sup>6</sup>

Our key point is that although having a more democratic planning system sounds like a good idea in principle, in practice it is likely to be very hard to prevent consultations on new local plans being dominated by unrepresentative local elites who want to resist new development. Therefore, it will be important for local authorities to go out of their way to try and engage with other stakeholder groups, particularly including young people, private renters and people who work in the area but can't afford to live there, to ensure that local plans genuinely reflect a diverse range of views. The emphasis which the white paper places on using new technologies to facilitate these consultation exercises present a great opportunity in this regard, as they should make it possible to both publicise consultations more widely and collect more detailed data on who has taken part and who hasn't.

### **3) The quality of new homes created using Permitted Development Rights must be safeguarded**

In the wake of the relatively large number of new homes which have been created under the Office-to-Residential permitted development right since 2013, it appears that conversions from other Use Classes to residential may be a significant source of new housing going forward. The Covid-19 crisis may possibly end up accelerating this process if it results in larger numbers of office buildings and shops becoming redundant than might otherwise have happened.

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<sup>5</sup> Local Government Association (2019) *National census of local authority councillors 2018* London: LGA

<sup>6</sup> Turley Associates (2014) *Neighbourhood Planning: Plan and Deliver* Bristol: Turley Associates

IF is concerned that these types of homes may end up being occupied by young people disproportionately who've been priced out of higher-quality accommodation. We were pleased to see the recent policy announcement that new homes which are created under permitted development rights will have to abide by the minimum amounts of living space per unit which is set out in the Nationally Described Space Standards. The fact that many of the dwellings which had been created under the office-to-residential permitted development right were very small was an issue which IF highlighted in a research report we published earlier this year,<sup>7</sup> where we recommended that space standards should become part of the prior approval process for this type of development.

However, other research has highlighted that there are a range of additional problems with the quality of homes which have so far been built under permitted development rights, including a lack of natural light, lack of outdoor space and access to public open space, a poor mix of different sizes of dwellings in these developments, and a tendency for these dwellings to be created in areas with poor access to amenities and public services.<sup>8</sup> Therefore, given the recent expansion of permitted development rights and the likelihood that a larger share of new housing delivery may come through this route in the future, it would be sensible if reforms to the planning system looked at how the prior approval process can safeguard the quality of these properties more generally.

If you would like to learn more about the work of the Intergenerational Foundation please contact:

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<sup>7</sup> Wiles, C. (2020) *Rabbit Hutch Homes: The growth of micro-homes* London: IF

<sup>8</sup> Clifford et al. (2020) *Research into the quality standard of homes delivered through change of use permitted development rights* London: DHCLG