

1. Is the current planning system working as it should do? What changes might need to be made? Are the Government's proposals the right approach?

No. The system is intended to be 'plan led' but the local plan process is too long and plans are often out of date before they are even adopted. The recent increases in the use of permitted development rights has also undermined the plan led approach.

The principle of changes that make it quicker and easier to update local plans should be supported, however the current proposals are significantly lacking in detail to the extent that it is not possible to know whether the approach is appropriate or not.

The focus of changes should be on the plan making process, to enable a return to a plan led system, rather than undermining the system through repeated changes to the decision taking part of the system.

2. In seeking to build 300,000 homes a year, is the greatest obstacle the planning system or the subsequent build-out of properties with permission?

Studies have shown that enough residential permissions are being granted to enable the Government's target of 300,000 homes per year to be achieved. This suggests that the planning system is not an obstacle and that build-out rates are having a significant impact on the delivery of these permitted dwellings.

3. How can the planning system ensure that buildings are beautiful and fit for purpose?

Stricter requirements through legislation or policy are required to ensure that what is needed is built where this is different to what developers want to build. Sanctions should be introduced for instances where the final built development is not constructed to the same design quality as was originally proposed and granted permission.

4. What approach should be used to determine the housing need and requirement of a local authority?

A top down approach cannot work because of significant differences in land values and viability across the country and in some cases across individual districts. A local approach is required to ensure that local circumstances are taken into account. The upcoming national census will provide a good opportunity to establish housing need across the country particularly in groups where it is often difficult to establish need, such as the hidden homeless and adult children still living with parents.

5. What is the best approach to ensure public engagement in the planning system? What role should modern technology and data play in this?

There is no one single approach that would facilitate adequate public engagement across all age groups. A move towards a more technology focussed approach may encourage younger age groups to participate more, but this could be at the expense of older groups and others without appropriate access to technology. It appears to be the case that people often do not take an active interest in development until development is on their doorstep. Encouraging people to take more of an interest in the built environment in general would likely have a positive impact on public earlier public engagement.

6. How can the planning system ensure adequate and reasonable protection for areas and buildings of environmental, historical, and architectural importance?

The system already does a good job at achieving this. It is important that any changes to the system designed to speed up development do not undermine existing protection of these assets.

7. What changes, if any, are needed to the green belt?

In general the green belt serves a purpose and there are appropriate mechanisms in place for the release of green belt land where it is required. However, there appears to be widespread misunderstanding about what the purpose and function of the green belt and this often leads to confusion over the status of potential development land. If the Government intends to make such wide ranging changes to the planning system, green belt should be considered a big part of it and should not be excluded from the review.

8. What progress has been made since the Committee's 2018 report on capturing land value and how might the proposals improve outcomes? What further steps might also be needed?

We have no comments to make on this point.