

FeCRA – The Federation of Cambridge Residents' Associations



Ministry of Housing, Communities and Local Govt,

London SW1P 4DF

By email to: planningforthefuture@communities.gov.uk

Cc Daniel Zeichner, MP; Anthony Browne, MP

Dear MHCLG,

Response to Planning for the Future Consultation by The Federation of Cambridge Residents Associations (FeCRA) <http://fecra.org.uk/>

Almost 100 resident associations and community groups are part of the FeCRA network, a grassroots civic voice for everyone in Cambridge — and also for its environment. Residents want a say in shaping Cambridge, to ensure that it develops in a way that will achieve balanced communities and quality of life. Our response focuses on concerns shared with us by residents, a number of them with experience of the planning system as architects, planners, directors of social services, environmentalists and as community group leaders working on Neighbourhood Plans.^[1] In addition we would like to highlight the following points to you:

The loss of democracy The proposed simplification of the planning approval system will limit the opportunities for local community engagement. The current planning system may be complicated and confused but it enables people to get involved at all stages. It is however under-resourced, under-staffed and undervalued and is up against a well-funded development sector lobby. We would argue that rather than tear up the planning system you provide it with more resources. In Scandinavian countries, widely seen as setting the standard, there is a long tradition of respect for design education and planning and architectural training is well resourced.

Local knowledge and accountability is vital. People want to have input on what they value at an early stage, not be presented with a fait accompli. How will the ideas be implemented in practice? It's not encouraging that the only government question on the topic asks how you might want to hear about plans, not how you might like to shape them. Crucially, how will local planning authorities be forced to engage instead of consult and ignore? The Thames Landscape Strategy, still going strong, is seen as a model of how to develop plans in a way that fully engaged and worked with the local community and we suggest this might be worth looking at.

Restricting the public engagement just to the preparation of Local Plan is therefore likely to have the opposite effect to the Government's stated intention of increasing public engagement. It suggests that the proposals in the White Paper are designed to limit and reduce community participation in order to make it easier for developments to proceed. We strongly object to this.

The climate and biodiversity crisis The Centre for Sustainable Energy and the TCPA say the planning system needs to be at the heart of delivering the UK's climate change targets. We agree.

<https://www.cse.org.uk/downloads/reports-and-publications/policy/planning/planning-white-paper-consultation-october-2020.pdf>

Planning for the Future's most controversial paragraph is probably 2.8 which says that all of England would be divided into three types of area: growth, renewal or protected. The use of the term 'protected' is misleading as the proposals in the White Paper do not provide any protection for it. In fact it is land that can be developed if the developer can show that the benefits of their scheme outweighs any harm that it might do.

The existing tests of soundness of a plan are to be replaced by a single statutory 'sustainable development' test. Going even further, Sustainability Appraisals are to be abolished and replaced with something simpler. Apparently the *"achievement of sustainable development is an existing and well-understood basis for the planning system"*, one that government proposes should be retained. The White Paper tells us there will be a new process for assessing sustainability. But sustainability needs to be clearly defined and to include deliverability checks. Much sustainability depends on developers keeping their promises. They need to prove that they can, for example, deliver a promise for a regular bus service, or deliver employment land on site, or that their plans allow them to retain an ancient hedgerow – and there needs to be enforcement. The planning white paper fails to accept there are major constraints on where we can build and its belief that planning exists mostly to say where houses must be built, rather than the protection of land, is a recipe for environmental destruction.

Water supplies and quality There are proposals to double housing targets for the south and east of England, to 100,000 per annum. Already our rivers and chalk aquifers are in terrible shape, with water companies receiving a scathing annual report this month from government, and assessments in September showing that all England's rivers and lakes are polluted beyond EU legal limits.

Development of new water-reduction policies relating to leakage, smart metering, product labelling, building regulations and water-efficiency communication has just been put on hold despite multiple warnings that parts of England could soon run out of water in five years without action; see the Ends Report, link below.

<https://www.endsreport.com/article/1698370/exclusive-defra-suspends-demand-reduction-policymaking-despite-stark-water-shortage-warnings>

The right way forward is to assess the impacts and issues arising from current and already approved growth. Without this evidence it is impossible to identify the key issues or parameters that would make future development sustainable. Many residents are concerned about the unquestioned assumption in this planning white paper that the current fast rate of growth for Cambridge will continue or even accelerate. They say that the very qualities of life and environment that have made Cambridge unique don't scale and ever-increasing growth will make the city a victim of its own success. The benefits of rapid growth for a small city are unproven, the costs are obvious. The pressures on the quality of life in the city, and the water crisis require restraint rather than increasing the level of growth within the plan area.

As Teresa May said on 8 Oct: "The problem with these proposals ... is it doesn't guarantee a single extra home being built and far from levelling up, it forces more investment into London and the south". <http://bbc.in/3jKsECX>

We hope that you will take these concerns and comments into consideration.

Yours sincerely,

Wendy Blythe

Chair, Federation of Cambridge Residents Associations (FeCRA)

For the FeCRA committee

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Cambridge CB2 8RP

ⁱⁱⁱ <https://www.fecra.org.uk/documents/>

<http://www.fecra.org.uk/docs/Meeting%20with%20Stephen%20Kelly%207.10.1919.pdf>

[Notes of meeting with Stephen Kelly at the Guildhall 5th February 2020](#)

[Notes of Zoom meeting with Stephen Kelly 11th June 2020](#)