

THE REGENTS NETWORK

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A WATERWAYS AND OPEN SPACE RESPONSE TO  
**'PLANNING FOR THE FUTURE' WHITE PAPER**  
**August 2020**

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There has not been sufficient time to make a full and detailed response to the White Paper, and a few comments follow (in no particular order). However, opportunity has been taken to respond to the 25 questions, which cover a wide range of issues.

Comments on the text of the White Paper

The Prime Minister in his Foreword says quite correctly that we have an outdated and ineffective planning system and that it is “a relic of the mid 20th century” which is not far wrong. In spite of that it does manage to plod on and is not totally ineffective. However, no one is going to disagree with the PM that we need “a whole new planning system for England”.

The PM says in the Foreword that we cannot live “where we can connect with our talents with opportunity” which is the case for many Londoners who have had to move out of town and commute daily. I have a colleague who has moved up to Luton where he and family finally found a property they can afford, and he commutes to the City near St Pauls daily (in pre-covid times).

Places to live are becoming fewer and more exclusive and costly, especially in London. This has led to ‘Dark London’ where one can cruise around the residential areas in the evenings, and find that there are no lights on as the homes are not occupied. In the central areas especially this is because investors and overseas owners have purchased the properties as an investment, and which are not used for residence.

It may not be totally accurate, but the Prime Minister in his Foreword comments that “thanks to our planning system, we have nowhere near enough homes in the right places.” Very true, but a conclusive resolution is not followed through robustly enough. There are many undertones and intrigues simmering in the background which are not directly faced in the White Paper, which may be far too polite a document.

Also in London, planning committees have become highly politicised and directed from above (or in the case of one London borough, dictatorially by the planning committee chairperson). Almost universally the Members not at liberty to vote the way they think is right. Often a Member may comment against an application for instance and then vote for it, when hands are raised automatically for the vote.

Planning committees are too political, and vote on party political grounds, rather than for the residents and community – whose homes, environment and employment are at issue.

Developers (and their masters) are too much in control, and far too high up in the company of the powers-that-be. Developers often seem to be empty shells, and far too often this is because they are fronting their bosses, and directed by investors and banks. Business and finance must play an important role in planning, but not an overwhelming control (or stranglehold). They too regularly are in place at the top of the governance and decision making – for their own benefits and financial gain, and not for the community, industry and the environment. It is very difficult for a local authority and planning department not to be dictated to (and in effect controlled) by the financial influences and dominant power.

Turning to transport, roads have ruined London, and front gardens. And motorways have ruined the countryside. However, transport is far too important and useful, but it has got out of hand. There needs to be a wholesale re-design of road transport, and the White Paper tackles the problem although does not solve it.

Daily commuting needs to be sorted out, and there is pressure for a wholesale change for reducing the need to travel, which means living near to where you work. This should be instigated now, as it will take decades to come about with a total demographic change. It is a generational issue. One unexpected situation (Covid) has perhaps initiated the change with 'working from home' being instigated. It could be a useful opportunity.

One of the keys to the success of implementing the 'Planning for the Future' and which does not get sufficient attention, is the government's NPPF National Planning Policy Framework. It is very instructive and positive. and (mostly) well written. It is certainly worth considering it as a template. Also, it looks very much like it was one of the influences which helped to get the White Paper under way.

Whatever the provenance of the White Paper, it is encouraging to see that it predicts that "communities will be able to trust the planning system again" (Page 24).

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## QUESTIONS

Qu 1 Important / Unaccountable / Compromised

QU 2a Yes

QU 3 Other – Networking

[Social media is biased and unreliable; Online news is selective; Newspaper are hampered; By Post is limited].

Qu 4 Top three priorities in planning locally: Quality of life / Building homes for younger people / The environment, biodiversity and action on climate change.

Qu 5 Not sure

Proposal 1 in dealing with land uses needs to have controls, as the term 'simplified' indicates a lessening of regulations and scrutiny which may not be intended but should be more carefully defined. Just allocating Growth areas, and Renewal areas is sensible. Also simplifying the Protected areas would be disastrous, and they need to be defined and flagged up very prominently, rather than being a sideline which they at present seem to be.

Qu 6 Yes, in general

Local Plans may be streamlined (whatever that means) but not simplified. The Local Plans are the depository of important and valuable information that is not generally available, as well as requirements for protection – and even updating while celebrating their heritage – such as our canals which can play an important role in transport into the next century having been busy and productive for the past 200 years.

Our canals are 2,000+ mile national heritage asset, still in working order but at present doomed to become static under their current management. No apologies for this plug, as Regents Network is dedicated to bringing our canals and waterways back to life, and in particular in London where the road traffic gridlock is unacceptable. This is an opportunity for the canals to take the stain. The local (and national) plans can assist directly in this sort of progress, with greatly beneficial outcomes.

Qu 7a Yes

This is a matter that is very thoroughly dealt with by Just Space, that Regents Network is associated with.

Qu 7b Cross-boundary issues are mentioned but in general avoided by local authorities. Also boroughs tend to be too centralised and the extremities of the boroughs seem to be sidelined, let alone with consideration of what is on the other side of the boundary. Incidentally, this causes no end of difficulties for the Thames in London as all the riparian borough boundaries run along the centre of the river, leaving the Thames relatively unprotected and ungoverned. This occurs at all administrative boundaries (town, city, county) and where the only demarcation is often the change in road surface material.

Qu 8a Yes

Qu 8b Yes.

My associates in Just Space (in conjunction with UCL Bartlett School of Planning) have a lot to say on these two matters and can express (and argue) them very competently.

Qu 9a Yes

These are sound proposals if they can be controlled and regulated. They should not be automatic as they then may become unsafe and open to exploitation. Development and planning is becoming more and more a 'commodity' to be traded, and some of the proposals in this White Paper may exacerbate the risks.

Qu 9b Yes

The text mentions 'risk' phrases including 'automatic' and 'pre-specified' and 'fast track' which must not be loose cannons that can too easily be exploited. How efficiency can be achieved is something that needs to be considered, rather than left 'at risk'.

Qu 9c Yes

To take a more general view, with all the fluency and streamlining of the planning system, there needs to be a robust and reliable management system, presumably operated by the local authorities, which are not equipped and sufficiently financed to provide a consistent and dependable performance – by a long way!

Qu 10 Yes

An excellent (and obvious) proposal, but the manner in which it is achieved is not so certain. Each bullet point in the text is relevant and progressive, but as a complete all-in-one package it is not achievable. Analysed closely, it is difficult to see the sequence of implementation, and the altering effect each item will have on other items which may then have to be modified. But, there is no harm in going for it.

Qu 11 Not sure

Uncertain is the answer, at the moment anyway. There certainly should be 'digital civic engagement' as suggested in the text, but this will take a while to develop into a workable and practical format, rather than a magic bullet, as that will impress no one. An important development of digital planning would be for it to be inter-active from an early stage, rather than just a flow of information. Also as the digital process can be so prolific there is always the risk of information overload!

Qu 12 Yes

There should be no reason for being unable to speed up the Local Plan process if it is treated as a priority by the local authority rather than an imposition. Boroughs strangely seem to consider it as a chore, and do not provide the necessary resources. The consultation process is also weak, and that certainly does seem to be a bit of a chore in the borough's eyes.

The approach to consultation must be more proactive on the part of the local authority – in other words they must go out and get the responses and opinions of the residents, groups and organisations. I recall Ken Livingston complaining about consultations, and I said to him that he should go out and gather the public responses! He did not respond directly, but he was thoughtful. Dramatic changes in the consultation process in the GLA did not occur, but certainly improved marginally! Again, 'working together' is the byword.

In the text (at Stage 3 (ii), Page 40) it suggests public comment on the plan, but it should be considered that the 'public' in its widest sense should be involved from the first stages rather than being presented with a fait accompli.

This resident and public involvement at earlier stages of all aspects of the planning process should be considered, to "make community involvement more accessible and engaging" (Page 39, para 2).

Qu 13a Yes

Should it be considered so preposterous by the authorities for a community group to take over their local plan from the 'authority' even though a Neighbourhood Plan is more advisory rather than statutory? The local authorities have taken a very negative view of community groups with 'big ideas', and at times seem to be a bit aggressive and 'dictatorial'

But looking around at public meetings and get-togethers, it is quite clear to see how much knowledge and expertise there is in the room. Many of the public there should be respected by planners and developers, rather than sidelined. These 'amateurs' are often very expert in their field and the planners and officers should more readily engage with them. Yet again, 'working together'. It is interesting to note that the community response is often unrestrained, whereas the officials may tend to be blinkered.

Qu 14 Yes

It is scandalous to see statistics of the number of consented sites undeveloped for years. There is no excuse, especially when developers do not supply the housing and premises because they can make even more profit for their investors (probably off-shore). Very strict time limits and conditions must be implemented., and rigorously followed up. Why this has not been solved by now is a mystery – and negligent.

Qu 15 Ugly and bulky

One disaster for the Camden Town area is consent for a huge glass and concrete wall of buildings along the edge of the Regents Canal, contravening so many policies in the NPPF and the London Plan as well as the LB Camden Local Plan. It is an apt example of what could be described as an 'unlawful' development with its disregard for policies and environmental issues. It is not an attractive development and encloses the open space character of the Regents Canal. LB Camden have recently launched an SPD which promotes more and more bulky buildings to the ruination of the Camden Town area, which is typified by low level housing and the characteristic brick terraces.

Qu 16 All of the suggested specifications for sustainability in no particular order.

The section title of 'Planning for beautiful and sustainable places' is a very sound principle, which has very wide and sincere support, including strong promotion from Prince Charles over many decades. Finally beauty and sustainability may have achieved more open and welcome status.

Qu 17 Yes

The Building Better, Building Beautiful Commission (BBBBC) is an inspiring title, but it is no wonder that it has found that the potential has fallen short. It is a very ambitious objective which is creditable, but how it can ever be satisfied is uncertain.

The 'Creating Frameworks for Quality' is a most attractive title to the section, especially with it accompanied by an historic brick warehouse building on the canal in Manchester (- that's quality). And . . .

We should learn from what has worked in the past. It should never be a copy of the past however successful. However, it is not necessary to now work completely out-of-the-box and produce something that is 'modern' such as the photo (Page 48) of the Sheffield building which is not totally objectionable, but it is a bit of a jumble. It is quite unnecessarily over-detailed and would benefit from a bit of simplification.

But as far as design codes are concerned, there is no easy answer. Perhaps more 'working together', including the community, although including the community would probably be seen as a bit stifling and requiring 'interpretations' by the architects.

How that is expressed in a design code is a matter for a 'tail-chasing' debate.

Qu 18 Yes

A Design Officer is a very sound idea, providing that it can be relied on to have a firm grip on the townscape (or cityscape especially in the current London mess). It should be broad-minded of course, and result in distinctive character of the location. It could result in providing a genuine 'sense of place'.

- Qu 19 Yes  
Promoting ‘design’ can have unfortunate outcomes, so needs to be employed with caution. However, paying more attention to the look of a building would not come amiss in some architectural practices. Pursuit of ‘Design’ should not be sidetracked and result in oddity or the unexpected, and ‘clever’ design should be moderated so that it is universally acceptable without having to be justified (which is usually so obtuse and contrived).
- Qu 20 Yes  
A ‘fast tack for beauty’ is an interesting opportunity – but with sensitivity and moderation. It is not a matter of decoration, as care with the scale and proportion is the key. Beauty is not something to be sought-after, and decoration is often inappropriate. However, in the photo, examples of the use of brick are demonstrated, and in many cases appropriate with a satisfactory appearance.  
Use of brick is often a reliable medium, but not necessarily as plain as the terrace in Rousillon Park (Page 44) as brick is more versatile. But the terrace has some good Georgian proportions which rescues it – and the chimney stacks of course!  
The Timekeepers Square photo (Page 17) shows some lovely bricks, but the opportunity for some detail in the brickwork is unfortunately missed. The elevation has boring proportions, and barely gets away with it.
- Qu 21 Priorities: More or less as listed – with the collective description as ‘quality of life’ – and comfort.  
More affordable housing – should be genuinely ‘more affordable’ and moderately priced, rather than the current version of being only ‘affordable to the better off’.  
Better infrastructure – dominated by the traffic problem with effects on almost every aspect of life including schools and health.  
Design of new buildings – learn lessons from the past. Repetitive elevations (pressing the repeat button on computers) should be discouraged (outlawed!), and buildings should have a ‘lid’ or roof rather than just stopping after a number of floors.  
More shops – accessible locally and in town centres.  
More employment space – integrated into the locality to reduce the need to travel.  
Green spaces – and more green spaces and open spaces, and a pleasant environment.
- Qu 22a Yes  
It would then be less likely to be under pressure from developers (and their investors) to ‘rebalance’ the levy in their favour.
- Qu 22b The Infrastructure Levy should be set nationally at an area-specific rate (coming from London that answer is predictable).
- Qu 22c Same amount overall  
But only if the proportions can be agreed – and reasonable. Otherwise ‘more value’ would be the answer, so that the cake can be divided to give a ‘suitable’ amount to each item.
- Qu 22d No  
Probably ‘no’ as there have been some disastrous debts mounted up by inefficient or wayward local authorities. Otherwise the answer could be ‘yes’ so long as there is close scrutiny and a reasonable prospect of any debt being cleared in due course. Tricky.
- Qu 23 Not sure  
This needs much more active and with direct scrutiny. The opportunity to ‘take advantage’ seems to be par for the course, and there seems to be a race to the bottom to provide that barest and most minimal housing.
- Qu 24a No  
The proportion should be increased in time, but the most important improvement would be to reclaim the term ‘affordable’ that has been hijacked and corrupted by developers, and

unfortunately with the collusion of the authorities – and government – who can be said to have shown a disproportionate loyalty to property developers (and their investors, probably off-shore).

Qu 24b Not sure

‘Discounted rates’ is an interesting (and indirect) way of operating the provision of ‘moderately priced’ housing. It would indicate that there was some interest in balancing out the process fairly, but why is it not directly stated? Who are the authorities wary of, or compromised by?

Qu 24c Yes

It is questionable whether a higher value can always be considered as over payments when the amounts cannot always be considered as reasonable and fair in this contentious market.

Qu 24d Yes

Reasonably priced (affordable) housing quality needs to be diligently controlled otherwise the provision would tend to be minimal rather than fair and reasonable. Unfortunately developers will always cut corners, and local authorities cannot be relied upon to be assiduous.

Qu 25 Yes

The function of the Infrastructure Levy is of course to provide the opportunity to deliver essential projects and infrastructure that may not always be affordable within the limitations of the local authority budget, but also offers the opportunity to tick-off items from the wish list. Why should the local authority not sometimes be on a crest of a wave.

Qu 25a No

But that relies on the local authority being dependable and even-handed and not to weaken under commercial pressures, and not to have fear of community involvement. There may not be a straight answer to that in the present climate.

This calls for a more effective and less artificially restrained planning system, as the Prim Minister mentions in his foreword to ‘Planning for the Future’.

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associate of London Forum and Just Space