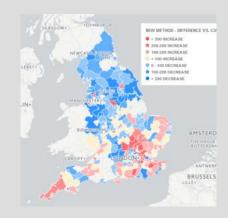




#### 1. Housing targets without geography.

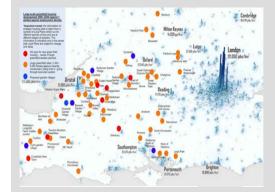
High housing targets for rural and semi-rural areas which are already being covered with car-based sprawl. Targets neglect to take into account the locations of jobs, services and amenities, or the right places to build for sustainable transport. We need to build close to major areas to enable people to travel where they want to without long journeys by car.





#### 2. Transport is left out of the Planning White Paper – hardly a mention. It's a basic mistake.

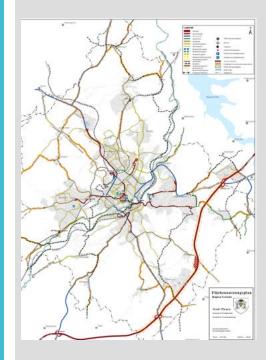
Planning and transport fail to come together in the White Paper. It seems fundamental that you need to consider development and transport together. It's common sense and the geography taught at school. You will not get the results you want without thinking very carefully about transport. If affects everything.



# 3. Local authorities are not islands. But cross-boundary 'strategic' planning is missed out from the White Paper

Transport for New Homes
BRINGING TRANSPORT AND PLANNING TOGETHER

The White Paper removes the duty to cooperate with adjacent authorities on planning and it remains unclear how adjacent counties and districts should plan together to build targets for new homes and fund infrastructure in a coordinated way. Will cross-boundary digital mapping help or will everyone use proprietary software in planning silos?





## 4. Division of all England into three zones: 'growth', 'renewal' and 'protected': far too simplistic

Just three 'zones' fails to capture the physical, social and environmental aspects of the country and fails to exploit digital mapping and evidenced based panning. We may well build in the wrong places for a sustainable future. The White Paper is clear: 'All areas of land would be put into one of these three categories'.





#### 5. More development in the countryside – more car-based sprawl as now

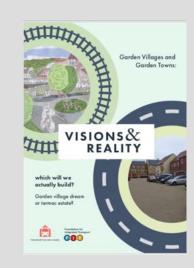
The White Paper encourages fast-tracked new homes in countryside locations. There are concerns that this will lead to even more car-based sprawl around major road construction – see our two reports.





## 6. Bypassing the 'outline planning' stage means a lack of scrutiny at a critical point in the local planning process.

The White Paper indicates that development in a Local Plan in a 'growth zone' will be fast-tracked and that outline planning missed out as permission is automatic? This means important data to consider including sustainable transport and associated matters may never come to light or be discussed.





## 7. Fewer local planning policies for your area – central government to take more command.

Local policies on housing, employment, biodiversity, landscape, flooding, transport etc. are proposed to be much reduced in Local Plans. The National Planning Policy Framework then becomes the primary source of policies for an area. But the new NPPF is unknown! Will it major on sustainable transport?!





## 8. Local sustainability tests scrapped in favour of single central government test. But what will it be?

The sustainability appraisal currently used in local plan development looks at housing, transport, biodiversity, carbon, flooding, water and much more. This is proposed to go, replaced again by a single 'sustainability test' devised by central government. But what will this test be? What might cause development to 'fail' it? There is no indication.





#### 9. Less money for pleasant, walkable and vibrant places to live

The new Infrastructure Levy to replace developer contributions risks being split too many ways. It is needed for affordable housing but then there will be less in those place for community provision and other infrastructure.



# 10. Digital mapping: presentational tool for quick consultation and real estate search, or for evidence-based planning?

The White Paper talks about the use of digital mapping and use of PropTech real estate software platforms. Software providers are talking about machine-readable plans that could automatically screen developments to identify where they align with policies and/or codes. Where does this leave transport?

'We're taking every advantage that new technology has to offer across the entire house building and house buying journey. Whether that's finding a plot of land, getting planning permission, engaging the local community, getting the property built or selling or buying a house'

Housing Minister Esther McVey MP in 2019 MHCLG Press Release



National Design Code

VAGUE

Finally..
MUCH
UNKNOWN!

UNKNOWN

National

Sustainability

Test

Community Infrastructure Levy

**VAGUE** 

National
Planning
Practice
Framework

**UNKNOWN** 

Digital mapping/ Proptech real estate management

**VAGUE**