

# Planning Consultation

## Addingham Civic Society Overview

Addingham Civic Society comprises 400 members from a village population of 4,500. It has participated in the stages of Bradford's Local Plan to date, including giving evidence at Public Examination.

More recently its members formed the core of a team tasked with producing Addingham's Neighbourhood Plan. This was overwhelmingly approved at Referendum in 2019. The Society is able to call on the services of a number of experienced professionals and expert members covering planning, architecture, energy conservation and the environment. It is thus well placed to comment on the Government Consultation from a local rural village perspective.

The main points are as follows:-

- The urgent need for new housing provision needs to be balanced between houses for **purchase** and for **affordable rent**. Currently the short term assumption appears to be that nearly all the demand will be met by private housing development for purchase. This discriminates against a swathe of the population who will never be able to afford to buy a home and also slows down overall housing provision. A vehicle needs to be found urgently to deliver large-scale affordable rental housing.
- The Government is looking to increase the tax raised from private house development. The Society would like to see tax applied where possible right at the start of the process. When land (especially Greenfield) receives planning consent for development, its value can increase exponentially and is directly reflected in ensuing house prices. A simple formula needs to be applied. When landowners dispose of planned land they would receive an agreed multiple of the original land value prior to the receipt of planning consent. Value in excess of this would be taxed away at source by the Government. This measure should reduce house prices in areas of high demand. The money would be recycled into housing provision rather than into general Government coffers via Capital Gains Tax.
- The term "Affordable Housing" is a misnomer. Houses sold at 80% of their market value are not truly "affordable" in real terms. Local house prices in Addingham offer a good example. Rightmove and Zoopla show average house price in the village last year of around £374,000. Recent new housing at Side Beck Grange has average between £480,000 and 535,000. 80% of these values means they are unaffordable for many local people.

- One of the key problems slowing the housing market is claimed to be “unaffordability”. Whilst this may well be an issue for the South and Southeast of England it is far less significant in the north overall. Here economic viability is much more important. There is often a plentiful supply of land / brownfield sites but economic regeneration and jobs are needed to create and sustain housing demand. This is in line with the concept of the “Northern Powerhouse”, requiring a massive re-direction of resources. The Housing White Paper needs to reflect this important shift in emphasis. Note, in this particular area developers argue that large areas of land especially brownfield sites aren’t viable, so their focus shifts to “easy” high value areas like Wharfedale. Housing here can’t meet the large-scale need for housing that people can actually afford and so the market slows, demand builds and prices increase.
- The severe reduction in the amount of funding Local Government receives from Central Government has taken its toll. Many departments, including planning, have shed staff with invaluable experience and expertise. It is therefore unsurprising that Local Plans take so long to produce. Local Authority assistance was initially offered for Addingham’s Neighbourhood Plan but never materialised. At the Public Examination into the Local Plan the meagre resources of the Planning Department were no match for the developers’ legal and technical support teams, with experience of many Local Plan examinations. It was also a daunting prospect for the Civic Society!
- The formulation of the Addingham Neighbourhood Plan created a huge amount of community interest and participation. The Society is in no doubt that these plans can be key to local participation in the planning process. Whilst the Government Consultation seems to envisage a lesser role for Neighbourhood Plans the Society would like to see them made compulsory with their current scope retained and enhanced. Where communities lack the expertise or resources to produce a plan, Councils should, in conjunction with the community, produce a “generic plan” aiming to stimulate and maximise local involvement.
- The focus on improving overall standards of design of new development especially housing is welcomed by the Society, but this must include internal space standards, sustainability and energy efficiency.

- The White Paper should also drop the term “beauty” in relation to development design as it is nebulous and unhelpful. The proposed Design Codes must be flexible enough to incorporate local character and design features and reflect local community input.
- The Society strongly supports the reform’s aspirations with respect to environmental stewardship, biodiversity and climate change but is unconvinced that the quicker, simpler, top-down framework proposed for assessing environmental impacts is likely to lead to better protection for wildlife and wildlife habitats (as claimed for example in Proposal16). With **specific site surveys** it is difficult to see the principle of net gain biodiversity can be measured and policed without rigorous ecological impact assessments of developers’ proposals. Whilst wildlife records held on central databases can be invaluable careful ecological surveys of development sites needs to be carried out before and after development has taken place. **Brownfield Sites** should be prioritised for development but planners should not assume that all brownfield sites are equally suitable for development. Some sites, following abandonment and rewilding have acquired significant biodiversity importance and deserve protection. Ecological surveys of such sites are essential before planning consents are granted.

In summary Addingham Civic Society has gained considerable recent experience in both Local and Neighbourhood planning. In its view the White Paper is an attempt to further centralise the planning process whilst reducing community involvement. This is regrettable because the introduction of Neighbourhood Planning has engaged our local community and provided a sense of ownership. Central Government’s role should be to produce an over-arching planning framework. Detail such as zoning and design criteria etc. should be devolved to properly resourced Local Authorities with a key role for Neighbourhood Planning.

Lastly a plea in respect of digital technology - whilst this has advanced hugely over recent years its expansion needs to be “tapered in” so as not to disenfranchise a significant percentage of senior members of the population who lack digital skills.