

## Caversham And District Residents Association

# Response to the Consultation on proposals for reform of the planning system in England from the Caversham and District Residents Association

## Introduction

Caversham and District Residents' Association (CADRA), with a membership of nearly 500 households, has represented the interests of its area for over fifty years. We are a well-respected and constructive partner of both the Borough Council and developers in dealing with planning matters - from the complex and strategic to comments on individual planning applications.

Caversham comprises the northern part of Reading, between the River Thames and the Chilterns AONB, with a population of around 30,000. It is centred on a medieval village, now a Conservation Area. It was extensively developed in the Victorian and Edwardian periods; development has continued since then, on a larger scale to the limits of Caversham's boundaries and through smaller-scale infill. The adjoining areas of South Oxfordshire intermittently come under heavy pressure for major housing development – a process in which CADRA gets involved both at the plan-making and application stages. Caversham therefore spans all three of the area typologies identified in Pillar 1: from the *Protected Areas* of its historic core and important ecology; the *Renewal Areas* which cover most of its built up area; the potential *Growth Areas* over the border in South Oxfordshire.

We feel that this combination of long experience as a community group and the nature of planning issues we have addressed over the years puts us in a strong position to respond to this consultation. We do not intend to comment on the mechanics of the planning system as a whole, but to confine our thoughts to how these proposals would assist or hinder residents and communities to engage better in the planning process, in line with the aspirations set out on Page 24 of the consultation document. We aim to make a positive and useful contribution in that respect, and for that reason only respond below to those questions which have a direct bearing on this issue – shown in blue.

### **Q1. What three words do you associate most with the planning system in England?**

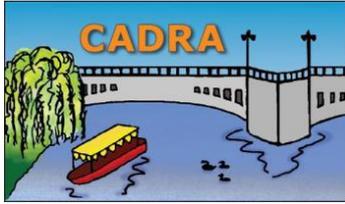
Vital; Undervalued; Under-resourced

### **Q2(a). Do you get involved with planning decisions in your local area? [Yes / No]**

Yes.

CADRA has been commenting on and influencing planning decisions for over fifty years. As well as commenting on planning applications, we respond to local plan consultations and, at the invitation of both the Borough Council and developers, participate constructively in pre-app discussions. Given the resource constraints in the planning department, we feel this makes a positive and well-received contribution. It is resourced through CADRA committee members with relevant expertise. Our comments on this consultation are based on this long experience of constructive engagement and draws from our engagement across the community.

### **Q3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future? [Social media / Online news / Newspaper / By post / Other – please specify]**



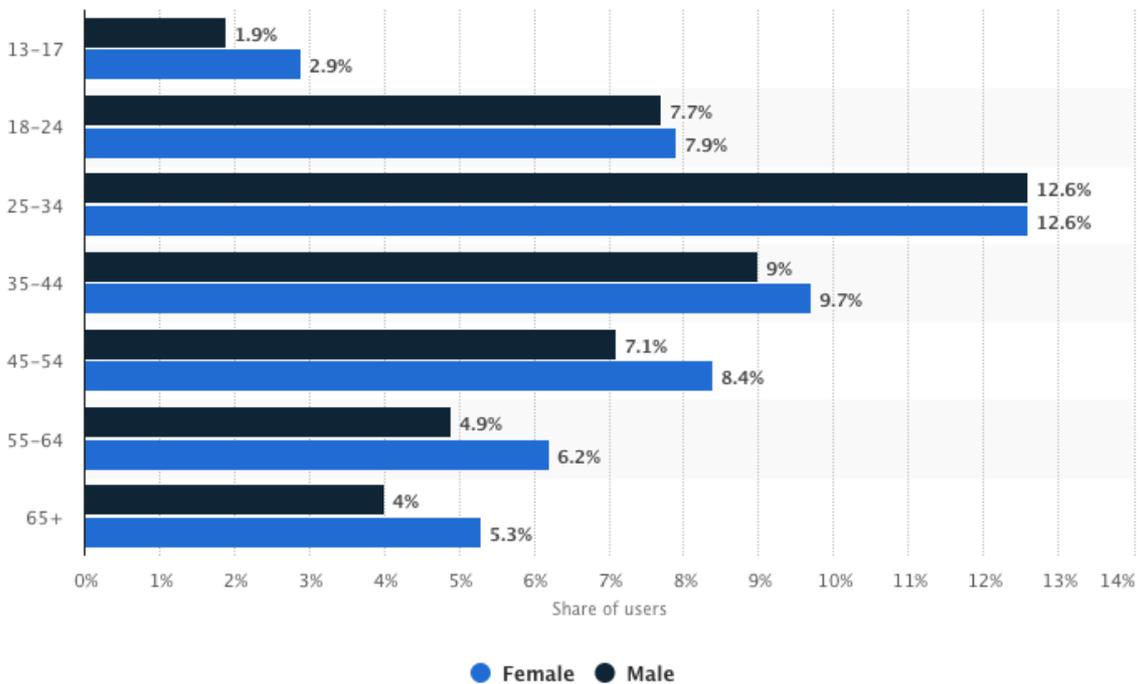
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Present arrangements would be very usefully supplemented by fuller use of social media as an alert and a reminder. We make regular use of social media but recognise its limitations. We feel strongly that social media should be an additional gateway to present arrangements, rather than replacing them. Our reasons for this view are:

1. Younger residents are more likely to be users of social media (see figures below). While concerned about planning in their area, our experience as a community group suggests that work and family pressures do not allow them the time to become as deeply immersed as such complex issues demand. But the older sections of our community, who have the time and, through retired professionals, the expertise to get involved, tend to use social media less extensively. So, over-reliance on such media risks disenfranchising some of the most actively participant sections of the community. Similarly, it would exclude all those members of the community who cannot afford smart phones and similar devices.

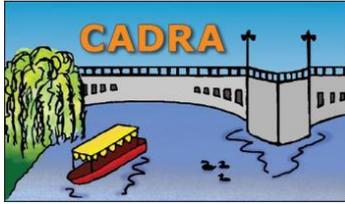
To use social media as a gateway to other sources of planning information, on the other hand, would be a very welcome way of drawing younger people into active engagement.

### Facebook users in the United Kingdom (UK) as of June 2020, by age and gender of users:



Source - <https://www.statista.com/statistics/1030057/facebook-users-united-kingdom-age-gender/>

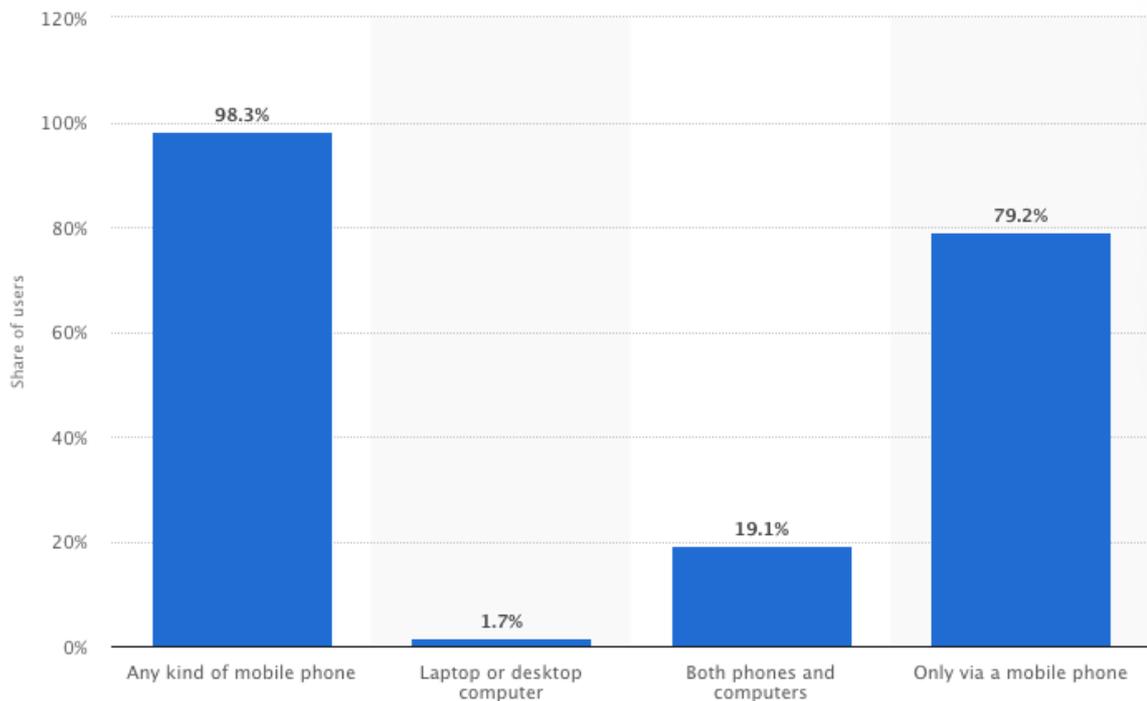
2. The complexity of material needed to take an informed view, even after the changes proposed in this consultation, do not easily fit into social media platforms. Furthermore, most users access social media via mobile phones, whose screens are too small for the detailed plans, maps and other information needed to take an informed view. They would



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undoubtedly be useful to alert people to issues in their area, but in the form of signposting to more comprehensive information on-line.

### Device usage of Facebook users worldwide as of July 2020

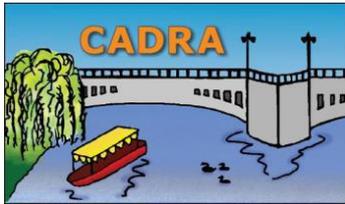


source - <https://www.statista.com/statistics/377808/distribution-of-facebook-users-by-device/>

3. It would be difficult for decision-makers to evaluate social media responses: are they based on full consideration of the issues, or simply on 'liking' and forwarding? Academic research suggests that social media posts exhibiting 'indignant disagreement' get twice the 'engagement' of calmer, more balanced contributions. It is generally much more fertile ground for campaigns of opposition to development than for considered responses or practical engagement.

***Q4. What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]***

Retaining the area's character; supporting local facilities, including retail; minimising through traffic.



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***Q5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]***

See Q11 and Q12 below

***Q6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement.]***

No – we strongly disagree

The nature and detail of such policies needs to be closely attuned to local needs and characteristics and should be determined locally in terms both of extent and detail and be subject to local community influence.

General national policies would not only eliminate opportunities for local engagement on development management policies at the plan-making stage. They would also severely limit the Local Planning Authority's ability to respond to residents' concerns over individual applications if their role were reduced to simply applying national policies. We cannot see how these could take account of specific local needs – for example, in the careful and detailed preservation of local architectural character. This unnecessary centralisation is a threat to the whole concept of public engagement in individual planning decisions and most definitely to the quality of the decisions taken and thus of the built result.

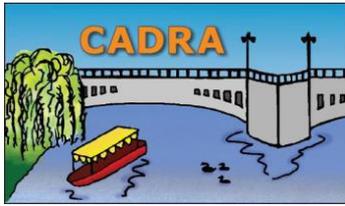
***Q7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of "sustainable development", which would include consideration of environmental impact? [Yes / No / Not sure. Please provide supporting statement.]***

In part – see Q7(b) below

***Q7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?***

Our experience of cross-boundary issues in our area make us feel strongly that the Duty to Cooperate (or something similar) should be retained, reinforced and widened beyond its usual remit of divvying up housing numbers. Our particular experience leads us to this view. We are sure that it is not unique and that many other areas have similar cross-boundary issues.

Our problem is that three radial roads converge here from outside Caversham, to use two bridges across the Thames into Reading. They bring heavy congestion, poor air quality and severe environmental impact to our local centre and wider residential areas. They carry traffic to and from



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southern Oxfordshire, but strategic planning in that area takes no account whatever of its external impact. For example, the revisions to the South Oxfordshire Local Plan envisage over 5000 new homes within this catchment area but ignore its impact across the boundary in Caversham. Similarly, Oxfordshire's highway planning makes no reference to this problem and steadfastly opposes one possible solution - a further Thames crossing.

We therefore urge that, in selecting Growth Areas in their forward planning work, Local Authorities should have a duty to consider impacts beyond their own boundaries. This should form part of the consolidated test of 'sustainable development' in Q7(a) and should be mandatory.

***Q8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]***

No. There are too many local factors to consider which could not be adequately addressed by a formula.

***Q8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]***

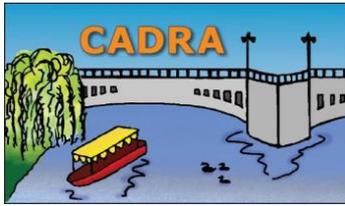
No.

Contrary to classical economic theory, higher than average house prices do not automatically indicate a supply shortage and thus a need for higher housing targets: a price premium is just as likely to stem from buyers chasing an area's inherent attractions, such as natural beauty or successful schools, as from any under-provision relative to population. Automatically increasing targets in response to higher prices would jeopardise the very assets which are driving values, putting at risk, for example, the AONB which closely adjoins our area. Affordability is a key concern but needs to be pursued by more subtle means than simply increasing overall supply.

***Q9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement.]***

Yes, but conditionally.

There is certainly duplication if development sites allocated in the Local Plan still need planning applications to establish the principle of development. However, these problems impact less on community groups like CADRA than those created when speculative applications are submitted for sites outside the Local Plan, where long and complex Inquiries focus on the minutiae of housing targets and severely stretch the resources of such groups, as well as of Councils. The substantial resources required for such appeals could more usefully be deployed in other ways.



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For groups such as ours, the proposed simplification would therefore be welcome on two conditions: first, that the designation of 'Growth Areas' should be based on as thorough and publicly-accessible a process, led by the Local Authority, as at present, albeit speeded up; and secondly that there should be a much stronger presumption against speculative applications outside such Growth Areas, up to and including a right for Local Planning Authorities not to accept them.

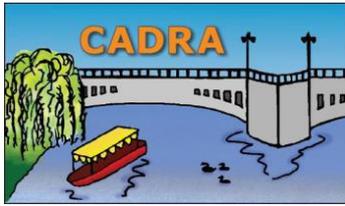
*Q9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]*

No.

Caversham is a fully developed area up to its boundaries, with few opportunities for major development, and a Conservation Area at its heart. As such, it probably typifies the Renewal and Protected Area categories. It is where our accumulated experience is most relevant to this consultation supplemented by our active involvement in Reading's Conservation Area Advisory Committee.

A major driver of these wider reforms is a wish to accelerate new housebuilding. Within Renewal Areas like ours, there is little scope for this on a significant scale: if there were, the sites should in any event be designated as Growth Areas. So, we do not agree that there is an urgent need for radical change to the existing system as it applies to Renewal and Protected Areas.

Renewal Areas like ours are heavily developed and fine-grained. The main concerns prompted by planning applications tend to be the safeguarding of amenity for adjacent residents and the retention and improvement of the area's environmental character. Applications tend to be heterogenous and require detailed and individual attention to get the right outcome. The planning system in such areas is widely understood and valued by the community as a safeguard, rather than being seen as a tiresome brake on development. The benefits of change in terms of accelerating development are heavily outweighed by the drawbacks in terms of impact on environmental quality and popular support. In these areas, our experience is therefore that the system is well-regarded and effective; it is 'not bust' and not in need of fixing. We have no issue with the presumption in favour of development or the primacy of the Local Plan. Our concern is that the Local Plan (especially if streamlined and shortened as proposed) can never be fine-grained enough to cover detailed issues of amenity and environmental character. Even less appropriate in this regard would be any form of automatic permission for pre-specified forms of development. Our experience, for example, of the results of PD rights to convert vacant factories into residential gives us no encouragement that such generic approaches work in such areas. We support Pillar Two's proposals for design codes in areas of major new development. However, to apply this to Renewal Areas in sufficient detail to cover adequately all the



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design issues which could arise from the process of continuous, small-scale changes in such complex areas would be a gargantuan task. It would be much more complex than the existing Local Plan. It would be far more cost-effective to determine individual proposals on their merits, as and when they arise, and far more likely to produce a satisfactory outcome.

The Introduction to the consultation asserts:

*Planning decisions are discretionary rather than rules-based: nearly all decisions to grant consent are undertaken on a case-by-case basis, rather than determined by clear rules for what can and cannot be done.*

In our view, this is exactly the right approach in the diverse and complex context of Renewal Areas. The sheer impracticality of the proposed changes in Renewal Areas, and their drawbacks in terms of development quality and popular support, vastly outweigh the very marginal gains in terms of accelerating large numbers of new homes.

We therefore urge that Renewal Areas should have the same planning regime as that described for Protected Areas.

**Q10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]**

Yes, but...

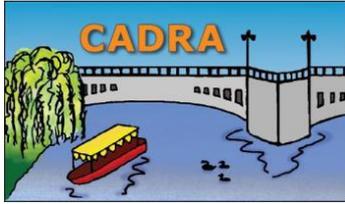
No one could oppose a faster system in principle, and the proposed streamlining of documentation might well help.

However, we have worked closely with our local planners over many years and that experience convinces us that the any slow performance results from the system being seriously under-resourced compared to, say, fifteen years ago.

The tone of the whole consultation is set by the Prime Minister's introduction, which posits an 'outdated and ineffective planning system'. We refute its being outdated: as it applies to our area at least, it is widely recognised and supported as the means of protecting the area's highly valued environment. Any ineffectiveness is less a structural problem in the system as the product of chronic under-staffing after severe cuts: there are simply insufficient staff of the right calibre. The consultation paper misdiagnoses a conceptual weakness in the system rather than the result of government policy and seems to advocate amputation of parts of the patient rather than applying the obvious cure.

**Q11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]**

No: See Q12 below



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***Q12. Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]***

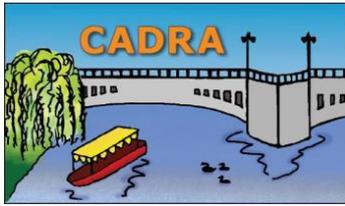
We combine our responses to Q5, Q11 and Q12 and answer 'Not Sure'.

The White Paper will have sweeping implications for community involvement. While we welcome the intention for much more fundamental and wide-ranging consultation at the plan-making stage, we have key concerns:

1. There are no firm proposals on how this laudable intention would be achieved. It seems to rely on technological solutions and greater use of social media. This might increase engagement with younger people, who tend to be heavily under-represented in planning consultations. (This underrepresentation is to some extent inevitable until they are sufficiently settled to feel invested in the area where they live.) But welcome as this would be, we reiterate our concerns at Q3 above that it could conversely discourage participation by older citizens. The two approaches are complementary and need to run in parallel.
2. Secondly, while a streamlined local plan process over a 30-month period has many advantages, it appears to include only two opportunities for community involvement (compared to four in the recent Reading Local Plan, for example, in which we were fully engaged). If the stages for public involvement are to reduce, more detail is needed on how each one could become more intensely participatory, to avoid reducing overall opportunities for concerned citizens to engage: while streamlining would reduce the demands on community groups' finite resources, and so could be welcome, real loss of public influence over the process would not.
3. The white paper suggests that "Local Plans should be visual and map-based, standardised, based on the latest digital technology... and limited to no more than setting out site- or area-specific parameters and opportunities." This is far too restrictive: there are a host of practical local issues which require some form of regulation or standardization and we believe the Local Plan is the appropriate local vehicle.
4. Over-emphasis on social media to disseminate and engage in Local Plans is impractical: not only does it exclude some parts of the community (Q3 above) but conveying all the necessary detail, including maps, on a hand-held simply will not work. Social, Media should be a useful tool as a pointer to issues and information but not the prime vehicle for conveying them.

***Q13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]***

Yes. We have observed the process in adjacent villages and seen the opportunities for substantial local engagement and real community cohesion. However, in a unitary authority like Reading it is difficult to see how Neighbourhood Planning would attract sufficient community resources, so a mix of approaches is needed.



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*Q15. What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/ or poorly-designed / There hasn't been any / Other – please specify]*

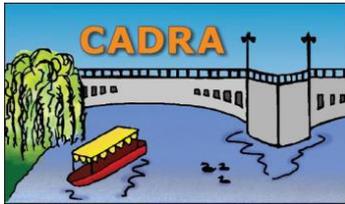
Results have been very mixed. There are examples of good design but also many poor or indifferent designs. Urban design and relationships between neighbouring schemes are often poor.

*Q17. Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement.]*

Yes/not sure

Properly drafted design codes, backed (as the consultation suggests) by strong public support, could have a big contribution to make in guiding and expediting development in Growth Areas. They would need fully to reflect the character of the local landscape and vernacular styles. Our 'not sure' element, however, reflects three concerns:

1. The availability of the requisite skills, as referred to in Q18 below.
2. Our experience of public engagement is that it is difficult to achieve fully at the more abstract, plan-making stage, and only really becomes widely mobilised in response to a perceived threat, be that a Local Plan proposal or a planning application. While we like the idea that such codes should evidence wide support, we see severe difficulties in mobilising sufficient public interest to achieve the envisaged strong endorsement. If that is a pre-requisite but fails to be fully achieved, we worry that such a failure will emasculate the code's effectiveness in regulating development, particularly at appeal. Such, over-emphasis on public endorsement therefore risks undermining this worthwhile principle, leading to the opposite of the high quality which is aspired to.
3. We feel that design codes will be most applicable in Growth Areas, where, applied properly, they could enhance both the speed and quality of decisions. They may also be useful in the protected landscape element of Protected Areas: for example, the Chiltern Design Guide has already enhanced developments in the nearby AONB. We feel they will be much less useful in Renewal Areas and in urban Protected Areas such as Conservation Areas. As suggested in Q9b above, the heterogenous, fine-grained nature of such areas demands a continuation of the 'discretionary rather than rules-based' approach which the document decries. There is a lot of merit in generic pre-application guidance to the public (for example, in our area on sympathetic changes to the Victorian and Edwardian housing stock), but we think it



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impractical and damaging to built quality if compliance with such advice translated into an automatic approval: how could such compliance be judged without some form of application, and who would make that judgement if not the local planning authority?

***Q18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making? [Yes / No / Not sure. Please provide supporting statement.]***

'Yes' to the new body: The Commission for Architecture and the Built Environment (CABE) was very useful and something similar would be a vital focus of expertise to support the welcome design-focused approach.

'Not sure' to the chief officer idea: while desirable, it must be adequately resourced. We suspect there is a real shortage of adequate professionals in this field, so demanding that every authority must have one risks watering down the resulting quality. It would be better to require design and place-making to be at the heart of decisions and championed at a senior executive and member level, but to leave its resourcing more open. Pooling of suitable talent could be encouraged, for example.

***Q20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]***

It is difficult to see how 'pattern books' would apply in Reading, for the reasons indicated in Q9b and 17b above.

***Q21. When new development happens in your area, what is your priority for what comes with it? [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other – please specify]***

All these issues are important.

***Q26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?***

We refer again to our comments on Q3: that an over-emphasis on social media in engaging the public in planning matters would discriminate against many sections of the population.

October 2020