

PLANNING WHITE PAPER (PWP) AUGUST 2020: PLANNING FOR THE FUTURE

Views of Southgate District Civic Voice: October 2020

Introduction

Southgate District Civic Voice is an amenity group concerned with the environment of the former borough of Southgate, now part of the London Borough of Enfield.

Local Plans

Southgate District Civic Voice (SDCV) welcomes the opportunity offered to involve the local community in shaping plans for the development and improvement of their area.

The local community must be engaged in the plan making process. This will need to be resourced and managed in a constructive way and funding provided to local planning authorities to facilitate specialist expert public relations, planning, place making, townscape and street design consultancy advice.

The local authority will need to fully co-ordinate and agree the local plans as they are developed with the local community. There would need to be a process of education and engagement undertaken with the local community prior to launching a process of plan preparation. The local community must have the ability to change and adapt local plans in response to changing circumstances and need. Although local plans will ultimately be compiled by the planning authority, there need to be safeguards against the dilution of the community's wishes and aspirations.

Local plans will need to be agile and able to adapt to constantly changing circumstances. The present method of plan adoption and preparation (a seven year passage to fruition) is cumbersome and long-winded. Presently all London local plans are required to be updated by 2024.

Metropolitan open space and green belt should be protected and subject to planning control.

Design Codes

Sufficient resources would need to be provided to compose and develop the local design codes. Development sites would need to be identified and design codes prepared and adopted for each site. At present Local Authorities do not have the resources to prepare design codes. There should be genuine community involvement in setting design guidelines not just cursory consultation.

The design codes would need to establish the parameters of local character including materials, density, sight lines, height, street character, circulation patterns and use. Design codes should consider environmental sustainability, new methods of construction and new materials.

Design codes will need to be flexible to take into consideration the complexity of suburban/urban areas, where different building types and styles have grown together over many generations. However, if they do not take into account this diversity, there is a danger they could be rendered completely ineffective as they become too general and vapid.

There is a danger that the articulate and enabled will control the codes and that the inarticulate will fail to engage meaningfully or indeed understand the process. This also raises the question of who determines what is good design, as this could be seen as relatively subjective.

Once the design codes are accepted and adopted there would need to be an ability to adapt and change them in response to changing needs or local aspiration, otherwise there will be little opportunity to influence decision making except in protected areas. They will need to be flexible enough to take into account new and greener technology as it develops.

The ability to influence planning proposals will be curtailed in development areas and restricted to protected areas. Within development areas almost all decision making will be delegated to planning officers who will measure the development proposals against the design codes and local plan; few planning applications will be determined by planning committee except in protected areas.

A clear-cut well developed set of Design Codes and Local Plan would need to be developed by the local community if situations like Southgate Office Village (see below) are to be avoided in the future.

Otherwise there needs to be a right of community appeal against ineffective design codes or local plans

Densification of Land Use

Densification will be in addition to the newly introduced permitted development rights.

Densification will apply to areas where affordability and land prices are highest. Redevelopment and intensification will progressively push up land prices and will create a ripple effect pushing densification and redevelopment to outlying cheaper areas. This will progressively change the character and nature of an area through a process of renewal. Increasing land prices will reduce the supply of affordable housing for those on low incomes, key workers and first time buyers.

Areas for renewal should primarily be brown field sites. There is a danger that densification will significantly denude open spaces and green areas with a corresponding loss of public amenity.

Development Levy

The introduction of a development levy or taxation on uplifted land values must be controlled by the local community where the development is occurring. The local community should be given the opportunity to decide where the accrued development levy is spent i.e. in their local area if they so decide.

Payment of a development levy after development will increase the local authority costs of providing essential infrastructure during development, because the money will need to be raised by borrowing.

Community Involvement

SDCV welcomes the references in the PWP to effective community involvement. SDCV notes the reference on page 72 of the PWP to improved public consultation opportunities for both citizens and developers to identify sites on which to build.

The PWP looks to facilitate community involvement at the early stages of preparing local plans and design codes. This is to be welcomed. As mentioned above such involvement would require additional resources to be effective. Local planning authorities would need to devote staff resources to engaging local communities both in plan preparation and design codes. In densely developed urban areas like Southgate each development opportunity is different and individual codes are likely to be required for each site. However, design codes cannot pre-empt every possible outcome at site level.

SDCV is concerned that there will be reduced scope for community engagement when a specific development proposal comes forward which is not entirely consistent with the relevant design code. Under the Government's proposals there will, in many circumstances, be automatic planning permission if a proposal broadly conforms to the local plan and design code. Such circumstances would be likely to give rise to local concern that the voice of the community will be ignored when a proposal is likely to be built. It is the experience of SDCV that the local community understands the likely effect of a proposal, only when the details are known.

SDCV can give a specific example of such a proposal. A recent planning application for development of a site known as Southgate Office Village (SOV) involved the development of a 17 storey tower block in a low rise residential area close to the grade II* listed Southgate underground station. Both the local authority and the applicant had failed to consult the local community in a meaningful way. SDCV held a public consultation meeting attended by over 100 people, facilitated by Civic Voice. SDCV put in representations to Enfield Council in reasoned opposition to the particular development. The officers failed to take account of the strength of the counter arguments to the proposal as well as considerable local hostility to the scheme in their recommendation for approval. The Planning Committee did however take account of community concerns and the proposal was refused planning permission.

Under the PWP proposals there would not be scope for community involvement as in the case of SOV. People understand a proposal more readily when it takes specific form rather than when it is described in theoretical form, as in a design code. SDCV considers that the scope for planning applications should be retained in complex, densely developed urban areas. Opportunities for community involvement should also be available when a specific proposal comes forward in such areas.

Land Use Types

Designation of land use in suburban areas will require very fine grained planning. This would require considerable local authority and community resources to plan appropriately. Without this detailed preparation, planning applications will be required for planning committee and community scrutiny.

Digital technology

We welcome the greater use of digital technology and simplification of planning application documents. However, this should not be to the detriment of local consultation, as not everyone in an area has access to the digital tools or follows planning matters closely.

**Southgate District Civic Voice
October 2020**