



COMMUNITY PLANNING ALLIANCE

MANIFESTO 2023/2024

Chairman's introduction

We have over 600 campaigns/campaigners active in the planning system on our UK map.

With a general election due in 2024, and politicians already taking to the airwaves with wild promises about how to 'sort out planning', we felt it was time to dust down, and update, our own manifesto.

Our supporters are a broad church. We are all united in facing a planning system that is not easy for communities to navigate, and are extremely worried about the impact of developments of all types on our ability to mitigate the climate emergency, on human health and on green spaces, habitats and wildlife. Beyond that, everyone faces unique issues. Our manifesto attempts both to cover all bases but not to creep beyond planning.

We are supportive, for example, of Dasgupta's approach which puts natural capital and biodiversity at the heart of economics, and Kate Raworth's 'donut economics', in place of politicians' favoured 'growth, growth, growth', but these sit outside the planning system. Likewise, we are supportive of campaigners fighting for leasehold and cladding reform, but this is beyond our scope. We also support the Nature 2030 five general election pledges¹ and urge supporters to sign.

Although the planning system is currently far from being able to deliver on the following, we do not feel it is too much to ask for a planning system that:

- gives communities power to influence;
- better protects green spaces, blue spaces and wildlife;
- puts the right developments in the right places.

Finally, we are proud to be a member of the Better Planning Coalition, which brings together national campaign groups active in the planning system to fight to improve it for people and the environment.

When it comes to housing, something that nearly all of our supporters have concerns about, we recognise that the housing crisis is a product of the lack of focus on building additional social housing over the past three decades. I therefore leave you with a quote by Rowan Moore in the Guardian (15 July) about the sometimes held belief that the magic of the market will make homes more affordable: "no it won't, no it won't, and no it won't".

Rosie Pearson

Chairman, Community Planning Alliance

¹ https://action.wildlifetrusts.org/page/130179/petition/1?locale=en-GB&en_chan=li&en_ref=262293284

1. Give communities power to influence

Our survey² showed that trust in planning is low, with planning done to communities (often ignoring them) instead of *with* them. We call instead for:

- Mandatory “Community Participation Test” in local plan and nationally significant infrastructure examinations.
- Demonstrate ‘Engage, Deliberate Decide’ (EDD) not ‘Decide Announce Defend’ (DAD).
- Mandatory consultation standards, to include The Gunning Principles, The Seven Principles of Public Life, Green Claims Code³ (and Quality of Life Foundation / Linear Infrastructure Planning Panel recommendations when published).
- Stop planning by appeal: drop Housing Delivery Test, 5-year supply and presumption in favour of development. Recognise Neighbourhood Plans and give them weight, even before adoption.



² Trust in Planning Survey <https://drive.google.com/file/d/1-4VDP5I0G7j-CH27oYXFMOEvvyTOg6BE/view?usp=sharing>

³ The Green Claims Code checklist - GOV.UK (www.gov.uk)

2. Go beyond the Environment Bill: *greater* protections

Thousands of acres of green & blue space (urban & rural) are threatened every year to housing, infrastructure, energy, critically impacting nature's recovery. We call for:

- Greater weight to the principle of avoiding harm in the mitigation hierarchy⁴. Moratoriums on building on irreplaceable habitats and when the development would result in environmental harm. Greater protections for trees & hedges⁵. Advice from statutory bodies must be followed.
- The appointment of a government Land Use Strategy Tzar⁶ and a land use strategy.
- Value countryside for its own sake. It is hugely valued in public surveys⁷ and performs many services. Protect best and most versatile farmland from development.
- Follow our Biodiversity Net Gain Metric 'ABC' recommendations & add 'Human Interaction Factor'⁸.

AN 'ABC' FOR GOVERNMENT TO IMPROVE BIODIVERSITY NET GAIN

Avoidance & Additionality

BNG must not become a '*get out of jail free*' card for developers. Avoidance, the mitigation hierarchy and other biodiversity regulations take precedence over BNG. Irreplaceable is irreplaceable. Additionality checks needed at every level. Create like-for-like habitats e.g. off-site open-space for farmland birds.

Boost funding

BNG will fail unless funding is boosted. Government and/or developers will need to commit significant funding to local authorities and the Office for Environmental Protection (OEP). Funding is needed for training, recruitment, delivery, monitoring & enforcement*. Developers must pay for projects up-front, into an escrow account.

Community involvement & trust

- Independent ecologists and independent enforcement & audit are essential. Give OEP this responsibility, with 'teeth' & funding;
- A community right of second opinion (paid for by developer);
- Right of veto for Wildlife Trusts or Natural England;
- Rights for communities to request call-in by Natural England.



*The £4m promised so far will not scratch the surface, equating to only £13k per local authority

⁴ We welcome the inclusion of the mitigation hierarchy in the Environmental Outcomes Reports consultation 2023.

⁵ See our survey, 'War on trees & hedges': <https://www.linkedin.com/pulse/war-trees-hedges-survey-results-rosie-pearson>

⁶ To pull together all the strands of government that are operating in silos with competing pressures on land that include growing food; providing habitat for wildlife; biofuels, renewables, development, offsetting.

⁷ [British countryside is part of our national heritage and the Government must take it seriously, new polling shows — Future Countryside](#)

⁸ Human interaction Factor: To account for damage to neighbouring habitat by domestic pets and air, noise & light pollution.

Solutions as per our survey⁹:

- A monitoring and enforcement fund, and additional funding and training for Local Planning Authorities, were the two most agreed with suggestions for improvement of the system.
- Many respondents also felt that an upfront, ring-fenced, financial bond is imperative to ensure that promises made are fully-funded.
- Compulsory site visits by ecologists at certain times of year were also considered essential by many, whilst mapping of site characteristics and the compilation of a national database were also highlighted as being important.
- **We received overwhelming support for our suggestions of:**
 - a community right of second opinion (paid for by developer);
 - right of veto for Wildlife Trusts and/or Natural England;
 - rights for communities to request a call-in by Natural England;
 - duty to consult beyond the development.
- **Of the ideas we put forward to improve the metric, the three most popular were:**
 - ensure that degraded land is scored properly;
 - metric to consider wider impacts (e.g. flood management);
 - any mitigation areas should be maintained in perpetuity.

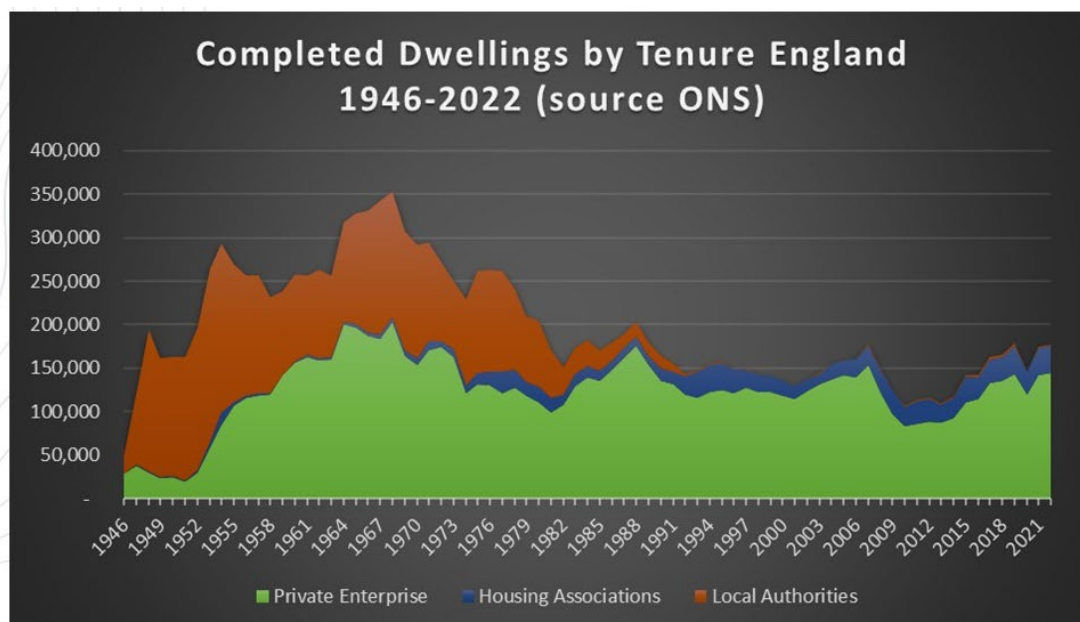


⁹ BIODIVERSITY NET GAIN – PROBLEMS & SOLUTIONS. COMMUNITY PLANNING ALLIANCE BNG SURVEY RESULTS 2021
https://drive.google.com/file/d/15mai-8J8DE6NmO94IT3H20PorwKVIDOb/view?usp=drive_link

3. The right developments in the right places

Prioritise brownfield land (when not biodiversity rich), genuinely affordable housing (social) and public/active transport. We call for:

- Shift in housing policy to meet, with a focus on and significant financial support for social housing¹⁰.
- Evidence-based and up-to-date (most recent ONS projections and Census) housing targets, tailored locally. Recognise that the 300,000 dwellings per annum is not evidence-based and that there are 1.5million more dwellings than households.
- Green transport¹¹, green homes¹² and desirable outcomes¹³ to be incentivised and funded. Disincentives for car use, with active and green transport alternatives provided.
- Bar on development until a fully funded plan for water and sewage is in place. Flood risk for new homes to be managed¹⁴.
- Mandatory Treasury Green Book guidance to be enforced for relevant projects to ensure proper project appraisal to include non-monetary assessment e.g. natural capital & socio-economic impacts.
- Financial disincentives for holiday homes, second homes and empty homes.
- Security and affordability for renters.



¹⁰ [A vision for social housing, from Shelter - Shelter England](#) 3.1m over 20 years, providing a return on investment in 39 years.

¹¹ Ensure that houses and public/active transport go hand in hand and that the NPPF, funding and S106 payments prioritise this and prevent car dependent development. Redirect the £27bn RIS2 road programme into sustainable transport.

¹² Including solar on all rooftops, grey water, permeable surfaces, air source heat pumps, insulation

¹³ Brownfield use and refurbishment. Provide grants and support to improve existing buildings

¹⁴ 10-year NHBC and similar guarantees for new houses to be amended to include liability for floods

WHEN THEY WANT TO BUILD ON GREEN BELT & COUNTRYSIDE, REMEMBER THIS:

1

ONE MILLION HOMES SIT EMPTY

WE COULD BUILD 1.2 MILLION
HOMES ON BROWNFIELD

2

3

THERE ARE 1.5 MILLION MORE
DWELLINGS THAN HOUSEHOLDS

THERE ARE UP TO 1 MILLION
UNBUILT PLANNING
PERMISSIONS

4

5

THEY WON'T BE GENUINELY
AFFORDABLE (SOCIAL HOUSING) .
THERE ARE 1.2 MILLION
HOUSEHOLDS ON THE WAITING LIST

HOUSEHOLD SIZES ARE NOT
INCREASING. STILL 2.4 - NOT AN
INDICATOR OF OVERCROWDING

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