

Planning for the Future white paper August 2020

Northumberland and Newcastle Society's response to UK Government proposed reform of the planning system in England

The Northumberland and Newcastle Society (N&N) is a volunteer based civic society dating from 1924. The N&N's primary objectives are to protect and enhance the landscape, culture and built environment of Northumberland and Newcastle for the enjoyment of this and future generations.

In pursuance of our objectives we work actively in partnership with local authorities, communities, developers and others, the N&N is committed to achieving truly sustainable development in our wonderful region.

Pillar One – Planning for development

1. What three words do you associate most with the planning system in England?

Inconsistent, unrepresentative, unsympathetic

2. Do you get involved with planning decisions in your local area? [Yes / No]

Yes

If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]

N/A

3. 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]

Other - Automated online updates from local planning authorities

4. 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]

The environment, biodiversity and action on climate change / Increasing the affordability of housing/ Protection of existing heritage buildings or areas

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

Not sure - Local plans must be meaningful, reflect local demographics and support sustainable regeneration. A truly democratic and transparent planning system is required to underpin public confidence in planning decisions. Whilst the Northumberland and Newcastle Society (N&N) has a heritage focus, its members are just as concerned with the need to provide the good quality housing and infrastructure so important to enable vibrant local communities. We have a particular desire to see much better use made of existing city centre buildings as places to live and bring new life to the high street.

We believe the current system for generating Local Plans is not fit for purpose as it relies on an ineffective public consultation process resulting in very limited real community engagement and thus undemocratic outputs. The N&N can specifically evidence great difficulty in making submissions to Development and Allocation Plan (DAP) consultations. Despite being relatively well acquainted with planning portal entries we found the Local Plan consultation portal had such restrictive and bureaucratic updating arrangements to effectively exclude inputs from local people and communities. This lack of local democracy excessively favours corporate developers whom are familiar with the process and can thus exert considerable pressure on local authorities to allocate inappropriate land for development in line with notional central government house building targets.

As a general principle we support reform of the Local Plans process. It makes total sense for local people and communities to be fully engaged in shaping their environment. Notwithstanding this, we believe 'Planning for the Future' placing the emphasis on local authorities being required to publish their plans ahead of the proposed defined detailed national planning standards is fundamentally flawed. Essentially this puts the cart before the horse and is likely to lead to many more examples of the wrong buildings in the wrong places and yet more blight. If the proposed reforms are to bring true improvements it is vital they are underpinned by a process that has public confidence.

- 6. 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.]**

Not sure - As we have commented above, in our experience the consultation process from which local plans are generated lacks effective communication, clarity, and cohesion. It was evident when we prepared our submissions to local development and allocations plan (DAP) making that woefully low levels of public engagement were being reported within statutory consultation processes.

The current system is heavily weighted in favour of developers whom are 'plugged in' to the planning system in contrast to local communities for whom public confidence in planning decision making has been badly eroded. Local plans should be about sustainable community place making based on adding real social, environmental and economic value.

We believe a more proactive and effective community engagement strategy at the plan-making stage will democratise development decision making, achieve more

consensus in the extent and location of new developments, and substantially reduce subsequent challenges to such developments.

In our view local plans must:

- Provide absolute clarity in defining the extent and location of development based on a compelling evidence base;
- Be presented in a meaningful, unambiguous format and language to ensure communities engage effectively in generating them;
- Adopt a standardised national format;
- Be based on an expanded range and depth of consultation. Too much proactive effort is required of communities and local organisations to inform the current process;
- Effectively communicate with communities to ensure public confidence in plan-making;
- Be transparent and unambiguous on what will be built on land allocated for development, so that plans give confidence in the future growth of areas and facilitate the delivery of beautiful and sustainable places;
- Be underpinned by defined established statutory requirements within a revised National Planning Policy Framework that reflect the proposals contained within the 'Living with Beauty' report published in January 2020.

7. (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.]

Not sure - We enthusiastically support the concept of sustainable development and we believe consideration of environmental impact needs to be a central pillar of local plans.

We strongly endorse the widely held belief that 'the greenest building is the one that is already built' and we feel that the true environmental cost of new construction should be subject to much greater scrutiny. We have great concern the sustainability test currently lacks sufficient breadth to accurately measure the environmental impact of developments. A good example of this was in the judicial review of the approval of London Heathrow Airport's new runway but this could just as easily apply to many developments across the country.

In the North East housing quotas have put local authorities under considerable pressure to grant planning approval for substantial new developments on greenfield sites lacking access to transport infrastructure and local services. This practice has serious adverse and immediate environmental impacts such as increased harmful vehicle emissions in areas already exceeding statutory limits.

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

We believe regional and local authority collaboration is an absolute necessity in achieving sustainable development in all senses of the term. In the absence of a unified regional authority with the statutory responsibility and powers to deliver sustainable development there is clearly a need for joined up thinking. We have suggested elsewhere in this consultation consideration be given to establishing a statutory body for sustainable development similar to Ofcom / Ofgem with relevant responsibilities and powers. Clearly such a body would be required to have local democratic accountability however many of its typical functions are already well established locally, regionally and nationally.

8. (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.]

Not sure - We believe it is logical for housing provision to be responsive to demand and taking a pragmatic view this needs to be based on a standard national methodology. The meaning of the term constraints needs to be more clearly defined in this process.

- (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 - It is generally accepted provision of sufficient sustainable, affordable housing is a social, environmental and economic necessity that transcends individual corporate interests as a desirable outcome for a just and fair society.

There is a reasonable expectation that major housebuilders will behave responsibly as important stakeholders in this collective objective. Sadly, it appears this expectation is often misplaced, as has been demonstrated through business practices such as:

- **Excessive executive remuneration packages;**
- **Selling houses as leasehold properties and subsequently transferring the leases to third parties whom then substantially inflate their cost;**
- **Corporate governance that is unresponsive to public concerns.**

We are particularly dismayed that some of these practices appear to have been underwritten by the UK taxpayer under the 'Right to Buy' scheme.

Given the above we would ask for consideration to be given to establishing a strategic national housing regulator along similar lines to Ofcom / Ofgem etc with appropriate enforcement powers and accountability. Such a regulator could be formed from existing and proposed functions referred to within this white paper.

9. (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]

Not sure - In principle if a robust Local Plan process has been established and within such a plan specific areas of land have been designated and allocated for development (Growth areas) it would seem logical to permit development compliant with the plan. The grant of outline permission for such areas must always have strict compliance criteria for good design, the difficulty arises as to how 'good design' is defined.

We would expect local authorities to have substantial powers within revised national planning policy to enforce requirements for good design, including minimum standards for the treatment of elevations and layout of buildings. We endorse the Building Better Building Beautiful Commission's 'Living with Beauty' report comment:

'People do not only want beauty in their surroundings. They are repelled by ugliness, which is a social cost that everyone is forced to bear. Ugliness means buildings that are unadaptable, unhealthy and unsightly, and which violate the context in which they are placed. Such buildings destroy the sense of place, undermine the spirit of community, and ensure that we are not at home in our world'.

(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 – Whilst we agree with the generic aim to simplify the planning process, in practice it is highly likely that areas designated as 'Renewal' will represent the majority of land identified as having potential for development. Our concerns echo comments we have expressed elsewhere in this consultation, namely the apparent focus of the white paper is to bring forward local plans before establishing a revised national planning policy framework. As revised national planning policy will underpin how local authorities will assess and designate both 'Renewal' and 'Protected' areas it is illogical and unreasonable to require them to make such assessments in advance of established national policy.

We believe prioritising publication of local plans over revised planning policy is counter-productive to achieving sustainable development as such plans will be hastily produced without effective reference to wider national and regional strategic objectives. Without legally binding commitments we cannot rely on all developers to build sustainably, noting another quote from *Living with Beauty* – *'Some housebuilders... believe they can build any old crap and still sell it'.*

(c) Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement.]

No – Using the Nationally Significant Infrastructure Projects regime to facilitate planning approval for new settlements will effectively circumvent and undermine the white paper's Local Plan process. This is undemocratic and unnecessary as land for such settlements, if still deemed necessary after available alternatives have been effectively exhausted, ie brownfield sites and vacant urban buildings, should be included in relevant Local Plans.

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

Not sure – We agree that decision making in planning should be faster and it would be desirable for a national standard digital platform to be in place to facilitate this.

A digital platform must make it easy for users to differentiate between applications for major developments and those relating to smaller scale matters. It makes great sense for Local Plans to be embedded in an interactive digital platform as this will facilitate immediate online access for applicants, communities and consultees to identify the type of development permissible and constraints that may apply in a specified area. In addition we would welcome the proposal for this platform to include a web-based mapping capability for planning documents again linked to Local Plans.

Local authorities should be incentivised to determine applications within specified time limits, however where there are reasonable grounds to ensure that applications are diligently and effectively assessed this should not result in punitive measures if timescales are exceeded. Any delays attributable to technical issues with the proposed national digital platform will need to be factored into the system as they are clearly beyond the remit of individual local authorities.

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

Yes - We welcome the proposal for an accessible, interactive digital platform including a web-based mapping capability for planning documents linked to Local Plans.

It is entirely logical for Local Plans to be embedded in such an interactive digital platform to facilitate access for applicants, communities and consultees to identify the type of development permissible, planning policy and constraints that may apply in a specified area.

We welcome the positive results from pilots using digital civic engagement tools demonstrating significant increased public engagement. We would like to see how these pilot programmes can be adapted to ensure wider access to people less technically minded but nonetheless we acknowledge the value of this feedback.

12. 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.]

Not sure – As we have commented in our responses elsewhere we believe the current Local Plan production process is not fit for purpose. We are unconvinced that simply setting 30 month statutory timescales for local authorities to produce their Local Plan will resolve the inherent failings.

There are numerous factors that undermine the ability of local authorities to produce plans in this timescale however many of these should be relatively easy to resolve if the true concept of sustainable development is applied. We believe the key elements in sustainable development for Local Plans are:

- Being people focussed to maintain and create desirable place making;**
- Representative of effective communication with local people, businesses and communities;**
- Not dictated by narrow commercial interests that favour major developers over the needs of local communities;**

- Derived from clear guidance and support from the UK Government on achieving national objectives for net zero greenhouse gas emissions;
- Enhancing local public transport infrastructure together with provision of dedicated pedestrian and cycle routes;
- Supportive of innovative concepts such as district heating schemes and other renewable energy opportunities;
- Effective interaction where appropriate with Nationally Significant Infrastructure Projects;
- Exemplifying objective regional collaboration to ensure development does not overwhelm local infrastructure and public services.

13. (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 believe Neighbourhood Plans make an essential contribution to Local Plans.

(b) How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

Neighbourhood plans provide an opportunity for effective community engagement with the evolution of Local Plans. We support development of pilot projects aimed at producing an interactive digital platform linking neighbourhood planning directly with the generation of local plans. We believe these pilot projects need to show how they can communicate in practice with people whom are not digitally connected.

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support? [Yes / No / Not sure. Please provide supporting statement]

Not sure - In principle we support the faster delivery of development where it is appropriate, however this again highlights the need for a meaningful and representative Local Plan process. If the sites identified have been selected and assessed according to a robust Local Plan and the development has been approved through a process that demonstrates ‘good design’ we see no reason why it should not be built out.

Pillar Two – Planning for beautiful and sustainable places

15. 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]

Other - There is inconsistency in the standard of new developments. Too much over-development, a lack of humanity and rarely inspirational.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify.

Other – All of the above, place-making, connected and enduring. We believe the priority for sustainability should be renovation and reuse of existing vacant buildings

17. 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 – We support the improved production and use of design guides as a central element in sustainable place making.

We believe good design is the heart of sustainable development and we promote our ‘Empathy Architecture’ concept to embody our expectations of design standards. ‘Empathy Architecture’ is a concept defined by the Tyneside Committee of the Northumberland and Newcastle Society (N&N).

As a volunteer based civic society dating from 1924 the N&N’s primary objectives are to protect and enhance the landscape, culture and built environment of Northumberland and Newcastle for the enjoyment of this and future generations. For any city these physical features are the very essence of what makes that place and gives it identity and soul. In Newcastle’s case its historic architecture is a profound and visible representation of the City’s pride in its cultural identity which is the envy of many other cities not only in the UK but internationally too. It is a city built on a vision of style and elegance, we believe these characteristics are a unique selling point in attracting investors.

The need for an Empathy Architecture concept emerged from the Committee’s sentiment in its review of planning applications where developers often show a lack of sympathy for heritage and cultural identity through bland and inappropriate building designs. The focus on short term financial gain seems to drive planning applications in many cases rather than a considered approach where good design complements the existing environment. All too often the Committee reviews applications where proposed developments will clearly have a negative visual impact and it is difficult to understand why their promoters have not considered a more empathetic design.

Empathy architecture is not just about how a building affects its environment today, it is as much about sustainability and value for money in the longer term. Good design will endure because it adds to the visual environment in time becoming part of an area’s attraction whereas ill thought out bland buildings have the reverse effect. In the domestic housing market character properties almost without exception attract a price premium because they are so appealing. The reality is we all need to consider making better use of existing buildings in city centres given not only the colossal challenges facing traditional urban based business but critically the need to better use finite natural resources.

18. 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 – We fully endorse the Building Better, Building Beautiful Commission’s place-making recommendations and we recognise there is a need to coordinate design coding and building better places. At a local level we can see the benefit of appointing a chief officer for design and place-making although in many cases it may make sense for authorities to collaborate to provide such a role.

The decline in the urban retail industry has and will continue to leave many character commercial buildings vacant thus presenting a generational opportunity to substantially alleviate housing shortages and in doing so reenergise city and town centres. There are many fine examples of innovative, sympathetic design being incorporated into existing vacant buildings where the outstanding original character architecture has been respected, protected and enhanced.

The N&N Tyneside Committee’s aim is to promote and embed the concept of ‘Empathy Architecture’ where good design that respects existing heritage architecture and the local environment is always a primary consideration in planning applications and a cornerstone of desirable urban planning and development.

We are committed to working constructively with local authorities, developers and others to promote and embed place-making as the basis of sustainable development.

- 19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes / No / Not sure. Please provide supporting statement]**

Yes – As referred to elsewhere we believe good design is essential to deliver desirable and sustainable place-making. Homes England should take advantage of best practice exemplars whom have shown that good design provides excellent value for money. We believe the innovative reuse of existing buildings in urban areas should be a strategic priority and a primary design consideration for Homes England.

The N&N seeks to dispel the perception that renovation represents poor value for money in comparison with demolition and reconstruction. When the Building Better, Building Beautiful Commission published its *‘Living with Beauty’* report in January 2020, it specifically highlighted this issue. *Living with Beauty* expanded on this point through reference to the current inconsistent, environmentally flawed and illogical VAT taxation policy that actively favours demolition of structurally sound buildings over their renovation and reuse.

***Living with Beauty* also made reference to the environmental benefit of recycling buildings, comparing construction of a new-build two bedroom house using up the equivalent of 80 tonnes of CO₂, against refurbishment using eight tonnes. Even with the highest energy-efficient specification the new build would take over 100 years to catch up. The embodied energy in the bricks of a typical Victorian terraced house would drive a car more than ten times around the world. Without doubt, the greenest building is the one that is already built.**

Innovative conservation incorporating good design and using quality materials may cost more in the short term but these costs are invariably insignificant in the real estate value of the completed building. An empathetic approach is much more likely to receive early planning approval and therefore reduce developers' submission costs where these often involve complex multiple revisions to inappropriate plans. There is a clear financial benefit to developers in getting an earlier return on their investment rather than having to maintain and fund vacant buildings during drawn out planning processes with uncertain outcomes.

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

Not sure – We certainly support the concept of a fast-track for beauty based on adherence to local design and codes. In areas of significant development we would expect good design to be defined for the overall land allocation and for individual sites forming part of such land.

We have some concerns over the use of pattern book designs where such designs may already be present despite being incompatible with generic local architecture, having been inappropriately approved or established in the past. In such cases there must be protections to prevent pattern book design being granted planning approval by precedent.

Pillar Three – Planning for infrastructure and connected places

- 21. 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.**

Other - More or better infrastructure (such as transport, schools, health provision) and green space.

- 22. (a) Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold? [Yes / No / Not sure. Please provide supporting statement.]**

Not sure – There is considerable logic in consolidating developers' financial commitments that support infrastructure and public services provision for such developments to ensure they meet sustainability requirements. In practice we can see difficulty in applying this concept given diverse demand nationally, in North East England local authorities' ability to raise meaningful funding from developers appears to have been very limited.

It seems more often than not local authorities in the North East have to make the least worst decisions on major planning applications, for example granting approval for sites close to the national strategic road network rather than where modest infrastructure enhancements to the local rail / Metro system would be far more beneficial.

(b) Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]

Nationally at an area-specific rate

(c) Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

More value - As a key element in the generic aim to reduce harmful emissions and as a central pillar in place-making the Infrastructure Levy must demonstrate better value for money. The value added by infrastructure improvements must be clear not just to local authorities and communities, it must be just as clear to developers to demonstrate how they can actively contribute to place-making.

(d) Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement]

Yes – Whilst we do agree this makes sense, in reality it penalises local authorities in less affluent regions where funds raised from developers are likely to be only a token contribution towards infrastructure delivery.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]

Yes – It is entirely appropriate for permitted development rights where a change of use is sought to be subject to infrastructure levy contributions. Sufficient safeguards must be applied in legislation authorising self and custom-build developments to ensure they genuinely meet the criteria for exemption from the levy.

24. (a) Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]

No – We see provision of sufficient affordable housing as a central pillar of national planning policy rather than being subject to negotiation for individual developments. The Infrastructure Levy should be exactly what is says it is to ensure developments meet the sustainability test.

(b) Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes / No / Not sure. Please provide supporting statement.]

No - Affordable housing provision should be subject of a more refined and systematic approach perhaps reinforced through the 'Housing Regulator' we have suggested above with appropriate statutory responsibility and powers. We are not confident in-kind payments or right to purchase arrangements

can reliably deliver affordable housing given our previous comments in respect of the questionable behaviour of some major housebuilders.

(c) If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]

Not sure – We refer to our comments at 24a & 24b above.

(d) If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]

Yes – We do not support in-kind delivery for the reasons referred to at 24a & 24b above, however if this method was to be approved it will require a robust and unambiguous enforcement regime. The revised National Planning Policy framework must include absolute requirements for good design to apply to affordable housing together with provision for appropriate corporate liability in cases of non-compliance.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

Not sure – This is another question where regional variance is an issue. We believe the Infrastructure Levy should be spent on exactly that, accepting the definition of infrastructure has quite a wide interpretation.

Given that planning is a long term process, albeit a dynamic one, there is a fundamental need for strategy in Local Plans rather than for short term ends such as reductions in council tax. If individual local authorities have significant surplus funds that have accrued from the Infrastructure Levy these could be used to offset shortfalls in other areas or regions.

(a) If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

Not sure – Noting we have answered 'Not Sure' to Q25. We broadly support the affordable housing 'ring-fence' concept as a national principle although this is less of an issue for North East England than elsewhere. In our previous comments we have suggested consideration be given to appointing a 'Housing Regulator' and we see provision of affordable housing as potentially falling within this role.

We believe legislative safeguards are required to prevent the acquisition of SME builders / developers by major corporate bodies or their use as a means to avoid liability for the Infrastructure Levy, in-kind commitments or other relevant payments that would be due otherwise.

26. 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?

Yes - We believe the current planning system in England is undemocratic and unduly weighted in favour of major developers whom can draw on

substantial professional resources. In our comments relating to consultation in respect of the Local Plan process we have highlighted our experience of low levels of public engagement. It is profoundly undemocratic and totally unacceptable for local people to be effectively excluded from critical decisions on how development will impact on their communities.

The intention behind Local Plans being shaped by communities is a worthy one, however it is manifestly clear the process needs radical reform. If Local Plans were truly representative of effective community engagement many development proposals would be welcomed rather than subject to extensive objections to planning applications.

The N&N as a relatively well resourced voluntary organisation has an enhanced knowledge of planning and Local Plan processes yet despite this we encounter significant difficulty in making both planning submissions and engaging with the Local Plan process. It is self-evident that only the most determined and those whom are well resourced will engage with shaping Local Plans.

We are not at all surprised that people feel disenfranchised from the planning process and we would agree this effectively discriminates against the majority of the population.

We fully support efforts to pioneer effective communication with all communities in a just and fair planning system as the centrepiece of a sustainable place-making strategy.

**Tim Wickens (chair – Tyneside Committee)
Northumberland and Newcastle Society**

26th October, 2020.

