

# TRIANGLE RESIDENTS' GROUP



Dear Dr Spencer,

## **Planning for the future; Response from Triangle Residents' Group (TRG)**

You asked for the Triangle Residents' Group's views on the Government's Planning White paper.

I am sure you will not be surprised that we, and we believe most residents, would view legislation of this nature negatively.

The White Paper blames the planning process for delays and blocks to housing development and therefore proposes deregulation as the answer. We question this premise.

We have read in the national newspapers, as we are sure you have, that developers nationally hold one million permissions which they have not exercised. If the Government's ambition is to 'build, build, build,' it would do well to address this accumulation of approvals, which exists because developers like to manage prices.

We also understand that nationally over 90% of applications are approved at Council level.

We won't address all points in the White Paper, but here are the ones we think most important.

### **1. Trust in the Planning Process**

We would agree that confidence in the planning process is low, as is trust in our council, Elmbridge. Our attribution for this is, however, different from that in the White Paper. Trust in the process is low because:

- developers are already perceived as having an unfair advantage
- developers regularly game the system (e.g twin tracking applications, lodging applications immediately prior to an extended holiday period when residents are distracted etc)

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- Elmbridge Planning officers are perceived as being reluctant to advise rejection of larger scale developments
- residents' objections are frequently not addressed seriously in the Officers' reports to the Planning Committee ( instead they are lumped together with a dismissive comment that the Officer has already dealt with them)
- on those occasions when a development deviates from the permission granted and residents complain, nothing is done about it
- developers often exempt themselves from providing affordable homes in a secretive costing process which involves consultants and the Planning Officer, but is not then exposed to Councillors or residents ( not even after the construction has been completed)

As the White paper seeks effectively to sweep away the existing process, you could argue these points have been addressed. We would contend, however, that the proposed cure is significantly worse than the illness

## **2. Loss of the Council's and Residents' voices**

The White Paper suggests that the loss of a say in the applications lodged will be compensated for by earlier and more comprehensive involvement in the formulation of a Local Plan.

TRG has contributed to the Local Plan and does not have issues with the way it has been conducted in the past. We take exception to the White Paper's assertion that what has taken place hitherto has been 'meaningless consultation.'

The Local Plan does, of course, represent a compromise effected by the council between different interests and different stakeholders, of which residents are only one. This compromise is acceptable because residents, and their elected representatives have an opportunity to comment on the applications subsequently lodged. This is, to a large extent, being removed under the White Paper. TRG regards this as a severe detriment to the democratic process.

In TRG's view, it would be impossible to inject the Local Plan with sufficient granularity relating to each potential site in the Borough to take into account of such important considerations as effect of a proposed development on the character of the area or its impact on nearby nationally or locally listed

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buildings. These aspects require close, detailed attention at the application stage.

## **3. Simplification and digitalisation of data**

We support and encourage this initiative. The application of the 'notice on a lamppost system' has led to grave disquiet. Elmbridge has also been poor at advising nearby residents of major developments that will affect them. (Though a system is currently available which, on request, automatically advises of all applications within a certain radius)

The opportunity should be taken to:

Standardise the information (plans, 3D drawings, etc.) required to support an application. Maximum use should be made of technology to allow a realistic appreciation of the proposed application within the street scene;

Ensure that pre-application advice, redacted for any commercial confidentialities, supplied by the planning authority should be linked to the application file;

Identify any amendments to applications clearly in a "change note";

Remove the outdated requirement of the Planning Authority to send letters to neighbours of applications, the opportunity should be made to encourage the use of modern communication methods to improve efficiency, reduce the use of paper and reduce cost;

Clearly state the full responsibilities of the Planning Authority so that residents can readily determine whether the Planning Authority is undertaking its processes correctly.

## **4. Affordable Homes - Thresholds**

See comments under Trust, above. Any move to increase the threshold to 50, or even 40, will be detrimental to mature areas like Weybridge where sites are generally smaller.

In any case, such thresholds could encourage developers to 'game the system' by putting forward proposals of 39 or 49 or fewer homes respectively, on sites which are able to take more, to avoid affordable housing requirements.

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## 5. The Categories: Growth, Renewal, Protection

The White Paper contains lots of nice sounding, vague words such as 'gentle densification'. What is not clear is what they mean. How would they be quantified? Assuming that the Triangle would fall into the renewal category, how many dwellings per hectare would be considered acceptable?

In Protected Areas, development, we read, will be 'restricted.' What does that mean, and who, without a community voice in the process, will govern its application? As the White Paper points out, and as we state at the start of this note, the credibility of councils is already low. Residents, and the challenges they make, press councils to discharge their responsibilities equitably. Without this voice....?

What would also be lost in these broad categories is the distinction between town centre and local centre. In the former, the existing character may be one of larger and denser development and there may be better transport links. These would permit a less gentle densification than local centres, where these are not in place. Overall, there should be clear unambiguous definitions of these areas.

Additionally there should be agreement on the use of terms so there is no ambiguity giving the planning applicant the opportunity to "dress-up" an application to make it more acceptable to the general public (i.e. definition of storey should be that used in the dictionary). A critical example is there is no definition of "sustainable" when referring to public transport associated with the proposed development site.

## 6. The introduction of a fast-track for beauty

At a conceptual level, we would not argue the need for beauty. Who, however, is going to be its arbiter? Tastes change. In the 1960s when Victoriana was out of fashion, had it not been for a band of idealists, St Pancras station would have been demolished.

TRG's experience of dealing with architects working for developers is that their core task is space optimisation. Beauty does not feature in the specification. Indeed, we have at times, (most notably in the case of the second recent application to redevelop Clive House, 12-18 Queens Road) found ourselves

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suggesting ways in which they could soften the more brutal aspects of their designs.

- 7. A new nationally determined, binding housing requirement that local planning authorities would have to deliver through their Local Plans.**

The problem with this is that the 300,000 p/a target, arrived at by the Government, when broken down according to the formula for Elmbridge, appears to make little sense when set against projected local population trends. Trust in the process will never be restored if residents believe that development is driven by a political promise rather than a quantified local need.

- 8. Each local planning authority to have a chief officer for design and place-making, to help ensure there is the capacity and capability locally to raise design standards and the quality of development.**

A worthy concept, but one which will wither unless there is dedicated resource (not just a secondary portfolio approach) and the role has the power to intervene in developments judged to have lower design standards.

- 9. Facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.**

2050 as a target is not ambitious. The Code for Sustainable Homes aimed to achieve the same thing by 2016 and was dropped by the government

## **10. Conclusion**

The White Paper would hand considerably more power to developers and reduce the public voice in the environment in which they live. The prospect of earlier involvement in formulation of the plan will do little to mitigate this. Trust in the current system may be low. If these changes were implemented, it would become even lower. Whatever else is decided, in our view robust legal guarantees are needed that the public is consulted at the point of application on all new developments. It is essential for successful public involvement to simplify and standardise the information which is generated to support planning applications; the current volume of documents supplied to support

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applications are often highly repetitive and currently do little to encourage the involvement of the public at large.

Kind regards,

Nick Thrupp

Chair,

**Triangle Residents' Group.**



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