



Buxton Civic Association
buxtoncivicasociation.org.uk

Tel: 01298 26978
contact@buxtoncivicasociation.org.uk
Buxton Civic Association Ltd,
Poole's Cavern Visitor Centre,
Green Lane,
Buxton,
Derbyshire,
SK17 9DH

27th October 2020

PLANNING WHITE PAPER 2020

COMMENTS BY BUXTON CIVIC ASSOCIATION

Introduction

Buxton Civic Association (BCA) has taken an active role in the planning of Buxton for more than 50 years. We believe that this is an important role for a Civic Society/Association.

BCA was formed in 1967. Our objective is to promote the preservation of the human and environmental heritage of Buxton and its surroundings for the public benefit. The general aim is to help maintain and improve Buxton and its surrounding area as a wonderful place to live and visit.

The acquisition of one hundred and sixty acres of woods surrounding Buxton and the visitor attraction of the cave at Poole's Cavern make BCA a unique civic association, owning and managing land (including Buxton Country Park) and running a business with tens of thousands of visitors a year.

BCA currently has approaching 700 paid members.

We are governed by a Board of volunteer Trustees.

We have active specialist BCA Member Groups (previously Committees) covering the following: Planning, Places and Spaces, Biodiversity, Woodlands, Membership and Community.

BCA contributes to the Buxton Community by:

1. Promoting the preservation and appreciation of the town's outstanding historical architecture and public realm
2. Commenting on all significant Planning Applications and Strategic Plans (e.g. Local Plans) affecting the town and its environs
4. Encouraging the development of good new buildings
5. Promoting the preservation of the natural environment in and around the town
6. Managing the woods, Buxton Country Park and a visitor centre for the public benefit
7. Campaigning on local issues
8. Using its woods and caves to help educate people of all ages, both locally and nationally.

General Comments

Please note, we do not comment on all the 24 specific proposals or the 26 questions. We have picked out the key issues, which we believe are important for the Buxton area and have indicated in brackets which of your questions each point most closely relates to.

We know that the planning system has evolved and changed over many years. However, we do not agree that a wholesale scrapping of the existing planning system is necessary. We also have major concerns that the proposals in the Planning White Paper will damage public confidence in the planning system.

We believe that the zonal approach involving zones for "Growth", "Renewal" and "Protected" is oversimplified and the idea that developments within the "Growth" zones be granted an automatic outline consent is extremely dangerous for the environment and local communities. (Q 5 and 9).

Representing a rural town and its surrounds on the edge of a National Park we are very concerned that the White Paper seems to be proposing a reduced role for planning in rural and countryside locations. Despite the Government's 25 Year Environmental Plan, there is very little added protection for wildlife sites or wildlife within this White Paper. National Parks, SSSI's and Ramsar Sites are not even mentioned in the "Protected" zones" (see para 2.8).

We believe that the White Paper is a missed opportunity. In this time of climate and biodiversity emergencies, the Planning System should become a powerful tool for helping our country address and remedy these critical problems. It does not do this.

Specific comments

- 1 **We support Civic Voice's call for Civic Societies (and Associations) to become Statutory consultees in all stages of the planning system.** We are very well placed to provide an informed and knowledgeable voice for the concerns of local people.
- 2 The proposed changes will create a stronger nationally led system of planning. **We are concerned that there will be a reduction in local public participation in the planning process.** The processes for Local Plans and planning applications needs to be simplified, but local communities need to be fully involved at both stages. Many people will feel that the new system is 'top down.' In particular, the proposals will remove key opportunities for bodies such as Buxton Civic Association to appear at planning inquiries. (Q 6).
- 3 There are proposals for simplified Local Plans. **We believe that the proposals focus too much on land allocation for housing.** There are many other issues which must be retained or added such as policies on health and wellbeing, contact with nature, increasing biodiversity, nature restoration, and climate change. (Q 5).

- 4 We are concerned that the proposal for a consolidated test of sustainable development which would include **a simplified consideration of environmental impact will result in less rigorous environmental impact assessments.** (Para 3.25, Q7).
- 5 **We are concerned about the impact of the proposals on statutory Neighbourhood Plans.** These plans have been one of the great successes of local plan making which have involved local communities. Although these plans are retained in Proposal 9, the status of such plans appears to be significantly downgraded by being made more focused. (Q 13).
- 6 **We are concerned that the focus of the land allocation for housing within the White Paper is on new greenfield sites.** There are enough brownfield sites in England for over 1 million new homes, and we believe that priority should be given to brownfield sites where they are not of wildlife, industrial archaeological or community value. Some brownfield sites can be of high human and ecological value whereas some greenfield sites have been severely damaged by intensive agriculture. There should be a more nuanced approach in which all sites should be evaluated on an index of their landscape, human and ecological value. (Q8?).
- 7 **We are concerned that the proposals will reduce the numbers of affordable houses being built.** Crisis and the National Housing Federation have called for 145,000 new affordable houses every year for the next 10 years. The proposals appear to raise the threshold for when affordable houses will need to be included in housing schemes. There is a real danger that less affordable houses will be built. Buxton and the Peak District is such an area where there could be less affordable houses being built. (Q's 21, 24 a, 24b, 25a).
- 8 **We do not agree with the proposals for the production and use of design guides and codes.** Design control is particularly important in the Spa Town of Buxton and the nearby Peak District National Park. Design guides must be developed locally reflecting the history and needs of the local area, and they must be developed in consultation with the local community. We are worried that too much design advice will be from a national template. We also believe that Local Design Guides should be included in the Local Plan, rather than being seen as a 'twin-track' approach. (Q's 17 & 18).
- 9 **We believe that all new buildings should be self-sufficient in relation to grey water and energy.** They should be required to meet stringent environmental / green conditions to achieve this end. The proposals should be strengthened to this effect. (para 3.32).
- 10 The White Paper proposes that planning applications will still be required in 'Protected Areas'. It is concerning that **National Parks, SSSI's, SAC's, SPA'S and Ramsar Sites are not mentioned in para 2.8 of Proposal 1. They must be included in the 'Protected Areas'.** Indeed, stronger protection is needed for designated wildlife sites and nationally designated landscapes (see amongst other reports the Glover report 2019). Para 3.22 states that "the reformed planning system will continue to protect places of environmental and cultural value which matter" and goes on to say "Plans will play a vital role in *identifying* not just area of defined national and international importance (such as

National Parks and Sites of Special Scientific Interest)...” The word “identifying” is disappointingly weak, “protecting” or “conserving” would be more appropriate.

11 The Government committed in its 25 Year Environment Plan to put the environment at the heart of planning and development. This white paper fails to do that. **We support the five key principles of the Wildlife Trusts:**

1. **Wildlife recovery and people's easy access to nature must be at the heart of planning reform.** Strategic planning for nature, in which the network of space needed for nature's recovery is identified, mapped and integrated into the planning system, must be applied across all zones. This Nature Recovery Network map must be upheld by law and should inform Local Plans.
2. **Nature protection policies and standards must not be weakened, and assessment of environmental impact must take place before development is permitted.** Currently the reforms appear to suggest that in most cases this takes place after permission has been automatically given.
3. **Address the ecological and climate crises by protecting land put into recovery.** The Wildlife Trusts propose this be done by creating a new designation – Wildbelt – to support nature's recovery. This would enable new land that is currently of low biodiversity value to be designated for nature, and so speed the creation of the Nature Recovery Network (to which the Government is already committed). It must reach into every part of England, from rural areas to towns and cities, securing the future of the new land that we are putting into recovery so that we can reach at least 30% of land in recovery by 2030 and address the climate and biodiversity emergencies. Wildbelt would form a central part of the National Planning Policy Framework review.
4. **People and local stakeholders must be able to engage with the planning system** at points where it is meaningful to them and sufficient information is available to understand the impacts – on nature and on local communities. It is vital that communities are made aware in the consultations of all the issues and opportunities their community faces – including climate and ecological challenges.
5. **Decisions must be based on accurate nature data.** A full program of investment is required to establish high quality ecological data. This will take time, so a transition program is needed to ensure that any fast turn over to new systems doesn't destroy natural places in the process. As strategic data does not provide the site-level detail necessary to ensure nature is properly taken into account, 'permission in principle' in the zones should still be able to be revoked. Timely, site-based survey work is crucial for accuracy and will recognise that nature changes and moves around.

12 **Whatever the changes, with challenging statutory timetables and with new digital systems, local authority planning departments will need more qualified staff (this should include at least one professional ecologist) and significantly more resources. Otherwise, whatever the final proposals, the new planning system will not be delivered.**



Peter Phillipson BSc, DipLD, MCIEEM, AAHI
Chair, BCA

e-mail: Chairofboard@buxtoncivicasassociation.org.uk