

The Rt Hon Robert Jenrick MP  
Secretary of State of Housing,  
Communities and Local Government  
Planning Directorate  
3rd Floor, Fry Building  
2 Marsham Street  
London, SW1P 4DF

Philip Glanville  
**Mayor of Hackney**  
Cllr Guy Nicholson  
**Cabinet Member for Planning, Culture  
and Inclusive Economy**  
Hackney Town Hall  
Mare Street  
London  
E8 1EA

[philip.glanville@hackney.gov.uk](mailto:philip.glanville@hackney.gov.uk)

Tel: 0208 356 3373

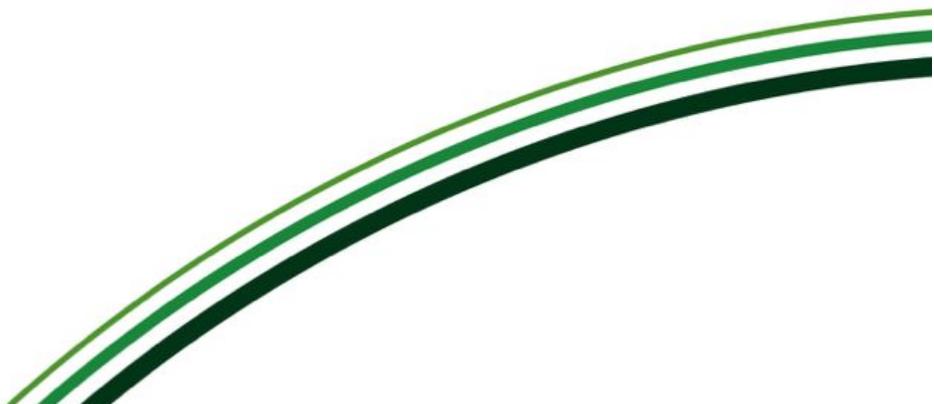
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Dear Robert,

### **Planning for the Future – Response from Hackney Council**

May I begin by thanking you for providing Hackney Council with an opportunity to engage and respond to your proposals set out in the Planning for the Future Paper. Hackney Council is committed to making the Borough a better place for its residents, businesses and communities. We take our role as a place-maker very seriously and we have given the White Paper proposals careful and full consideration; preparing a response that encapsulates comments and expert opinions from across the organisation. These reflect the opinions of the Members of the Council and the technical expertise of Officers. Council services that made substantive contributions to our response include: Planning; Regeneration; Housing; Transport; Public Health; and Finance. In summary, we offer a comprehensive and expert insight on the White Paper's proposals.

The White Paper's basic premise that our nation's Planning system is irretrievably broken is itself open to much debate. In Hackney not only are we successfully delivering upon our housing requirement, we are also determining more than 90% of our major applications and over 80% of all minor applications on time, while a quarter of residential Planning permissions granted since 2012 went unimplemented by the developers. Whilst our Planning system may not be perfect it is far from being a lost cause. Hackney Council's experience is positive. Earlier this year we adopted a new Local Plan with a growth strategy that seeks to meet and exceed housing targets. We



managed to meet this challenge quickly – assembling an evidence base; conducting meaningful public consultation and engagement; undertaking an examination in public; and moving towards adoption within three years. Our new Local Plan sets out our positive and proactive position towards significantly boosting housing supply – as the local Planning Authority; and as a housing developer and landowner. Corporately it is an important tool for delivering regeneration, renewal and new genuinely affordable housing for the Borough. It is not a sign of a broken system.

In contrast the proposed solutions are over-simplistic and will result in the removal of local control and accountability for both plan-making and decision-taking. As such future plans that come forward under the White Paper proposals will fall short of what we have achieved. There will undeniably be fewer opportunities for local residents and communities to engage in plan-making. There will be less transparency in plan-making – particularly in respect of future Planning policies. As a consequence, local residents and communities will not be able to take ownership of future plans and are therefore unlikely to embrace change and growth.

We strongly believe that our nation's Planning system must be fundamentally concerned with the delivery of sustainable places that meet the needs of both existing and future local residents and communities. Plan-making and decision-taking should be informed by a proportionate but meaningful evidence base. Processes must be democratic, transparent and allow for meaningful engagement that genuinely informs strategy and policy. At the same time these processes should not be weighed down by unnecessary bureaucracy. These processes should seek to secure outcomes as quickly as possible but not at the cost of sound plan-making. Our national Planning system should be about securing good quality place-making that endures for future generations. It must be about flexibility. Critically it must balance top-down guidance with local evidence, knowledge and expertise. One-size does not fit all scenarios.

It is clear to me and to Hackney Council that neither the Planning system nor Local Planning Authorities are the cause of failed delivery. Indeed the genuine barriers to delivery have been clearly set out by the Letwin Report. We feel very strongly that changes to the wider development process must be undertaken if the White Paper proposals are to have any meaningful impact. In that respect, the Government must intervene in respect of the development industry's on-going manipulation of housing supply; the out of control land values; and in relation to the delivery of genuinely affordable housing.

In respect of the White Paper proposals themselves, I refer the Minister to Hackney Council's technical response for detail and supporting evidence. However, I would like to highlight two issues that are of particular concern, foremost among those is the significant democratic deficit that a number of the proposals will collectively bring. Increased centralisation in policy-making and housing target calculation do not sit comfortably with plan-making or decision-taking. Our national Planning system has a long history of consultation and engagement with local residents, businesses and communities. Here in Hackney we have become reliant upon such engagement to secure a consensus for future growth. Many of the White Paper proposals would remove those gains in one foul swoop. This would result in not only alienating our residents and communities but also put at risk our hard won plans for future growth. I cannot stress enough that these proposals would be hugely counterproductive.

I would also briefly like to express some reservations about the proposals set out under Pillar 3 of the White Paper. Hackney Council cannot enable or facilitate successful place-making without appropriate investment in infrastructure. We would like a Levy that is capable of making a genuinely meaningful contribution to mitigate the impact of development and deliver the necessary infrastructure and affordable housing to support growth. The current system provides both flexibility and much-needed certainty based on viability considerations and the recent removal of pooling restrictions was much-welcomed. In contrast the proposed national charging rate is neither appropriate nor proportionate for all places, especially in such a diverse country with widely differing sub-regions.

In respect of the provision of new genuinely affordable housing we consider it essential that any new system delivers more than 30% affordable housing, and that genuinely affordable social rent and intermediate housing be prioritised over the ineffective subsidised First Home market housing suggested in recent proposals. The Government needs to provide Local Authorities and Registered Providers the tools to deliver genuinely affordable new homes. Failure to address this critical issue will leave an unpleasant legacy for our future generations.

I would like to conclude by once again thanking the Minister for this opportunity to positively influence the evolution of our nation's Planning system. Hackney Council welcomes the opportunities that accommodating growth can bring — especially in terms of making life better for residents and communities. However, we must work together to secure that future. In that respect I ask the Minister to give Hackney Council's response the full consideration that they deserve.

Yours sincerely



Philip Glanville  
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