

Bristol Civic Society  
(on behalf of the listed civic societies and Civic Voice)  
email: [enquiries@bristolcivicsociety.org.uk](mailto:enquiries@bristolcivicsociety.org.uk)

1 March 2023

Rt Hon Michael Gove MP,  
Secretary of State for Levelling Up, Housing and Communities  
and Minister for Intergovernmental Relations,

Sent by email to: [correspondence@levellingup.gov.uk](mailto:correspondence@levellingup.gov.uk)

Dear Secretary of State,

## **LEVELLING-UP AND REGENERATION BILL: CONSULTATION ON REFORMS TO NATIONAL PLANNING POLICY**

We are writing to you about a specific aspect of the proposed reforms to national planning policy - the '35% urban uplift'. This letter is from civic societies in the affected '20 largest towns and cities' and Civic Voice.

Overall, we support the government's policy objectives, as set out in chapter 2 of the consultation document. We welcome the stated desire "to make good design and place-making that reflects community preferences a key objective of the planning system". This has notably been missing in many places, both in how planning policy is prepared and the quality of development that secures planning permission.

It is very important that this policy objective influences all national planning policy, and is applicable to all locations. At the moment, ministers appear, in effect, to be devising a two-tier approach to placemaking. We fear that the character, quality of place-making and community preferences in our towns and cities will fall victim to this apparent doubling down on the 35% uplift.

Our local communities also want, in the words of the consultation, "beautiful new development, in a local plan shaped by the community, supported by appropriate new infrastructure, that enhances the environment, creating new neighbourhoods while respecting existing ones".

We very much agree with government that "planning for housing is not just about numbers" and argue this should also apply to the 20 largest towns and cities. In our view, planning should look at the needs of the community in the round and be underpinned by environmental responsibility. As the consultation document says, "Ensuring that enough land is allocated to provide the right homes in the right places that our communities need, alongside other economic, social and environmental needs, is a central task of planning."

But this is not the essence of the urban uplift. It is unevidenced and arbitrary, and the justification given in the consultation does not stand up to scrutiny. We agree that brownfield and other under-utilised urban sites should be prioritised for housing

development, but only to the extent sites are suitable and brought forward as part of informed placemaking. It is a gross over-simplification to say, as per the proposed footnote 30, that the uplift through focusing on brownfield sites and building more densely will “ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live near the services they rely on, making travel patterns more sustainable.” This ignores current and likely capacity in social, physical and environmental infrastructure, the needs of communities in the round including for jobs, family housing and access to open space and nature; and, the fact many brownfield sites are high in biodiversity value, heavily polluted and are in locations suffering from poor air quality.

What is more likely to ensue in our towns and cities, is over-development using building styles alien to localities, added pressures on already stretched services and people condemned to live in unhealthy homes.

Yours sincerely,

Civic Voice  
The Birmingham Civic Society  
Bristol Civic Society  
The Coventry Society  
Derby Civic Society  
Leeds Civic Trust  
The London Forum of Amenity and Civic Societies  
Potteries Heritage Society  
Reading Civic Society  
Sheffield Civic Trust

Note: in some of the ‘20 largest towns and cities’, there are not active civic societies