

Levelling-up and Regeneration Bill: reforms to national planning policy

WGOD response submitted 23 February 2023

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1

Do you agree that local planning authorities should not have to continually demonstrate a deliverable five- year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than five years old?

Yes.

For a local plan to have been found sound, it will first have to contain details in strategic policies of specific, deliverable sites to meet its housing requirement for at least the first five years and potentially, for the first ten years of the plan. Thus, should there be a future concern that projected housing trajectory is potentially falling short of that accepted at the examination, the cause is most likely to be due to developer behaviour who are able to regulate the rate of building new houses in a way that will maximise selling prices. Therefore, any 5YHLS assessment indicating a shortfall would penalise the LPA over matters for which it has minimal, if any, control.

Unfortunately, as currently constructed, both the NPPF and accompanying guidance take the position that should housing delivery fall below the requirement, the solution is to punish the LPA with the presumption. As LPAs have minimal input to the build-out rate following a grant of permission, to penalise the LPA for lack of delivery is wrong and the current proposal to set aside

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the 5YHLS for the first five years is a small step to put right the current shortcomings in the NPPF.

The fundamental weakness of the 5YHLS is the reliance on the standard method to provide the housing requirement. The standard method is supposed to represent the objectively assessed housing need, but its use for this is patently absurd as certainly, for rural authorities in SE England, the standard method provides a much-inflated figure. Therefore, although the proposed change to the 5YHLS outlined in this question is to be welcomed, the elephant in the room remains the continued use of an unchanged standard method. Any pressure to amend the 5YHLS or HDT would be much reduced if the housing need figure was objectively assessed by a mechanism that was justified: the standard method completely fails this requirement.

The standard method fails to provide an objective assessment of projected household growth and affordability pressures. It is accepted that for a short period in the late summer of 2018, the method attempted to consider projected household growth, but following the publication of the 2016 Household Projections, the continued reliance on the earlier 2014 Projections meant that these out-of-date projections totally lost their objectivity. This position has been further worsened with the later publication of the 2018 Projections. Furthermore, the forthcoming 2021 projections are certain to show yet a further fall in the rate of increase of future households over the 2018 projections. Thus, the use of the 2014 household projections as the number underpinning the standard method cannot be considered to provide an objective assessment of household growth; it quite plainly is not objective, nor justified.

The affordability factor is similarly flawed. The use of the workplace earnings rather than the residence-based earnings in Districts like Wealden, which has a low wage economy combined with a large commuting outflow to better paid work outside the District, completely misrepresents the ability of Wealden residents to afford homes. The use of residence-based earnings in place of workplace earnings would provide some

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improvement. However, the largest weakness with the affordability factor is the totally perverse situation whereby the greater the number of new dwellings completed in Wealden worsens the affordability ratio, rather than reducing it. This is due to the median cost of the new build homes being provided is above the median cost of existing homes arising from both the type/size of new homes being provided, and the new homes premium. The affordability factor, which has a substantial impact on the so-called “need” in rural Districts, does not address the issue that it was intended to resolve and is clearly not fit for purpose.

As a result of using the 2014 household projections and the affordability factor being defective, the standard method becomes completely incapable of reflecting the objectively assessed local housing need. Therefore, to use the standard method as the basis for plan-making, or to identify the number of homes required in the 5YHLS assessment and the number of homes needed to be built over the preceding three years for the HDT, is illogical, ineffective and quite plainly wrong. But to put off any change to this iniquitous situation until late 2024 at the earliest, or sometime thereafter, is absolutely wrong.

2

Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

Yes.

The 5YHLS calculation uses the standard method to determine the local housing need. However, due to fundamental weaknesses in the standard method, this formula fails to provide

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the objectively assessed local housing need in a rural district like Wealden.

We accept that for a short period in the late summer of 2018, the standard method attempted to consider projected household growth, but following the publication of the 2016 Household Projections, the continued reliance on the earlier 2014 Projections meant that these out-of-date projections totally lost their objectivity. This position has been further worsened with the later publication of the 2018 Projections. Furthermore, the forthcoming 2021 projections are certain to show yet a further fall in the rate of increase of future households over the 2018 projections. Thus, the use of the 2014 household projections as the number underpinning the standard method cannot be considered to provide an objective assessment of household growth; it quite plainly is not objective, nor justified.

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If developers fail to build out as anticipated and as a result, the LPA fails to meet 85% of its so-called need, the chances of then meeting a need containing an additional 20% buffer are

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negligible. The result is the imposition of the presumption, meaning that any plan-led approach falls away. Of course, this will be very attractive to developers, who will stand a much better chance of gaining permission for their favoured, non-allocated sites, but it makes a mockery of the requirement for a plan-led system.

The standard method requires practically all rural LPAs to deliver housing far in excess of what has ever been previously achieved. To then increase further this quantity by 20% simply illustrates the “Alice in Wonderland” approach to try and achieve the 300,000 national figure.

The buffer has the perverse impact of requiring LPAs to identify and bring forward more land than is required in their local plan. In most cases, more homes will not be built, but developers will pick and choose those sites from which they can make the best return, which frequently are not the ones included in the local plan.

3

Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on, or is there an alternative approach that is preferable?

Yes, an oversupply should be taken into consideration.

It would be iniquitous for an earlier oversupply not to be deducted from any subsequent 5YHLS requirement as this would likely result in an increase in the development of housing on un-allocated (normally, less suitable) sites. This result militates against a plan-led system.

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However, the concept of using the 5YHLS to stimulate development is badly flawed as it is developers who control the build out rate and hence the number of dwellings anticipated to be completed over the succeeding five years. Consequently, to penalise LPAs for not achieving their 5YHLS is specious as they generally cannot impact the actual rate of delivery of permissioned housing.

The major issue with the 5YHLS is the requirement to firstly use the standard method to assess the number of dwellings needed to be delivered. The standard method produces a grossly inflated number for the need in rural Districts like Wealden and this number certainly does not reflect the objectively assessed local need. Clearly, achievement of the 5YHLS would not be the current highly challenging hurdle if the housing need was not defined by the standard method, but by an assessment that was objective and justified.

It is accepted that for a short period in the late summer of 2018, the standard method attempted to consider projected household growth, but following the publication of the 2016 Household Projections, the continued reliance on the earlier 2014 Projections meant that these out-of-date projections totally lost their objectivity. This position has been further worsened with the later publication of the 2018 Projections. Furthermore, the forthcoming 2021 projections are certain to show yet a further fall in the rate of increase of future households over the 2018 projections. Thus, the use of the 2014 household projections as the number underpinning the standard method cannot be considered to provide an objective assessment of household growth; it quite plainly does not.

The affordability factor is similarly flawed. The use of the workplace earnings rather than the residence-based earnings in Districts like Wealden, which has a low wage economy combined with a large commuting outflow to better paid work outside the District, completely misrepresents the ability of Wealden residents to afford homes. The use of residence-based earnings in place of workplace earnings would provide some

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4 *What should any planning guidance dealing with oversupply and undersupply say?*

5 *Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?*

We support the proposed changes that will strengthen the protection afforded to neighbourhood plans and their effectiveness where an LPA’s policies are out of date.

The current two-year protection is woefully inadequate and disincentivises communities from preparing a NP. Thus, the proposed five-year “life” of a NP is to be welcomed.

The removal of the other tests is also welcome as they are far too blunt in causing the protections in a NP to fall away when their LPA is struggling to ensure its policies remain in-date.

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6

Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

Yes.

But this brings up the question of what number of homes and development do our communities need? We strongly believe that the standard method does not objectively assess the local housing need and it is simply a crude formula contrived to achieve each LPA's share of the politically inspired 300,000 figure. This figure has little, if any, justification.

A very concerning omission from this consultation is any proposal to amend the standard method. The intent to review the standard method after 2024 is too late for the majority of LPAs currently engaged in plan making to meet the government's December 2023 deadline. For those LPAs with an up-to-date plan, they are still required to use the standard method' assessment of "need" in their 5YHLS and HDT assessments.

It is far too simplistic to attribute the so-called housing crisis to that of an undersupply of houses, although, understandably, this reasoning is supported by the development industry. If there is a housing crisis in SE England, it arises from the lack of truly affordable housing, both for ownership and rent.

Unfortunately, so much of recent government policy towards housing has stimulated in an increase in house prices. These policies have helped a small proportion of buyers onto the housing ladder, but at the expense of increasing new housing prices for all. It is recognised that the Help to Buy scheme and the stamp duty holiday both have resulted in a considerable increase in first time buyer home prices.

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With the failure to address at this time the iniquitous standard method, it can only be hoped that in the proposed consultation next year, this method of wrongly assessing the housing need is set aside in favour of an objective and justified method.

Taking Wealden as an example, for many years, deaths have outnumbered births, leading to a negative natural population growth i.e. the existing population is falling. Yet the standard method stipulates that 1,200 additional homes are to be provided each year. Over a 20 year plan life, this would increase the district's housing stock by 35%, a truly ludicrous increase when the natural population is falling. With only a small number of suppressed or overcrowded households in the District, this 35% increase would result in a population increase caused from those migrating in, of the order of 30%. By contrast, over this same duration, ONS estimate that Wealden's population will increase by around 9%.

Quite clearly, there is a disconnect between the standard method and the ONS population predictions. Whereas the ONS data has been derived from a rigorous analysis of past trends and future predictions of births, deaths and migration etc. the standard method formula has no similar provenance and relies on the totally out of date (and now discredited) 2014 household projections combined with an affordability factor that is a crude approach that fails to provide an uplift based on local affordability.

Thus, the standard method fails to provide an objective assessment of projected household growth and affordability pressures. It is accepted that for a short period in the late summer of 2018, the method attempted to consider projected household growth, but following the publication of the 2016 Household Projections the continued reliance on the earlier 2014 Projections meant that these out-of-date projections totally lost their objectivity. This position has been further worsened with the later publication of the 2018 Projections. Furthermore, the forthcoming 2021 projections are certain to show yet a further fall

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Thus, the standard method does not help to plan for the homes that our communities need. However, the stated limited reasons permitted for using an alternative method of assessing need do not allow rural authorities similar to Wealden to avoid using the standard method.

Thus, we are in favour of the wording in the opening chapters of the NPPF to be revised, but until a more objective method of assessing local housing need is permitted, the revisions to the wording will not be satisfactory whilst the standard method continues in its current form.

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- 7 *What are your views on the implications these changes may have on plan-making and housing supply?*

We agree with the concerns listed in paragraph 4 of Chapter 4 and consider that they are valid. They do reduce community confidence in the plan-making regime and the short-comings need addressing. However, these concerns do not engage with the fundamental issue, that being the use of the standard method.

The standard method fails to provide an objective assessment of projected household growth and affordability pressures. It is accepted that for a short period in the late summer of 2018, the method attempted to consider projected household growth, but following the publication of the 2016 Household Projections the continued reliance on the earlier 2014 Projections meant that these out-of-date projections totally lost their objectivity. This position has been further worsened with the later publication of the 2018 Projections. Furthermore, the forthcoming 2021 projections are certain to show yet a further fall in the rate of increase of future households over the 2018 projections. Thus, the use of the 2014 household projections as the number underpinning the standard method cannot be considered to provide an objective assessment of household growth; it quite plainly does not.

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With both the use of the 2014 household projections and the affordability factor being defective, the standard method becomes completely incapable of reflecting the local objectively assessed housing need. Therefore, to use the standard method as the basis for plan-making, or to identify the number of homes required in the 5YHLS assessment and the number of homes needed to be built over the preceding three years for the HDT, is illogical, ineffective and quite plainly wrong. But to put off any change to this iniquitous situation until late 2024 at the earliest or sometime thereafter, is completely amiss.

Most Wealden residents are already highly concerned with the ongoing levels of development (being an average of 746 dwellings/year over the last five years) and are horrified when they become aware that the requirement from the standard method is for 1,200 dwellings/year. The character of the district is being badly degraded by the existing level of development, whilst the increased pressure on the already inadequate infrastructure is intolerable. To therefore expect the community to be content to have a further 60% increase in current development imposed whilst retaining trust in the planning system is very unlikely. Trust in the planning system in Wealden has long gone and it will take a sustained period of much reduced development i.e. well below the current 746 dwellings/year, for any trust to be regained.

8

Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are

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there other issues we should consider alongside those set out above?

Yes.

Policy and guidance should be much clearer with regard to what constitutes an exceptional circumstance to provide a route for plan-makers to use a justified alternative in assessing their need. In addition, clarity is also required to preclude PINS from denying plan-makers the option of using their justified alternative method.

However, it needs to be acknowledged that the standard method does not objectively assess the local housing need. Until this is recognised and a rational replacement is in place (e.g. as a minimum, use of the most up to date household projections and abandon the affordability factor uplift to provide a starting number), any tinkering with guidance or wording is akin to the proverbial deck-chair shuffling on that stricken liner in the north Atlantic.

The standard method fails to provide an objective assessment of projected household growth and affordability pressures. It is accepted that for a short period in the late summer of 2018, the method attempted to consider projected household growth, but following the publication of the 2016 Household Projections the continued reliance on the earlier 2014 Projections meant that these out-of-date projections totally lost their objectivity. This position has been further worsened with the later publication of the 2018 Projections. Furthermore, the forthcoming 2021 projections are certain to show yet a further fall in the rate of increase of future households over the 2018 projections. Thus, the continued use of the 2014 household projections as the number underpinning the standard method cannot be considered to provide an objective assessment of household growth; it quite plainly does not.

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Thus, certainly in rural districts like Wealden, the standard method completely lacks objectivity and justification meaning that an alternative method of assessing the local housing need must be preferable and should not need to be justified by exceptional circumstances. With the standard method being basically unjustified, it is iniquitous that the proposal requires exceptional circumstances before any replacement method can be used.

It is an Alice in Wonderland situation to require the use of superseded, out of date figures unless exceptional circumstances can be demonstrated before an alternative justified method can be permitted. If the government wishes to retain any credibility at all with regard to the housing need, it should immediately drop its pretence that the standard method represents the local objectively assessed housing need and permit LPAs to use an alternative justified assessment method.

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9

Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

Yes.

Without this additional clarity, PINS will likely continue to demand that LPAs use their Green Belt to make up any shortfall in allocated sites required to meet their assessed “need”.

If new building is permitted that significantly increases the density and degrading the character, this will quickly lose any remaining public confidence in the planning system.

It would be iniquitous for any past over-supply not to be taken into account.

It should be remembered that the push-back against the planning system has largely come to prominence due to the requirement to use the standard method to determine the housing need. This method frequently produces an inflated figure of need that then requires LPAs to squeeze too many dwellings into their area. If a more objective assessment of the housing need was permitted that resulted in lower figures, then clearly, there would then not then be such a large pressure to release land from the Green Belt.

The Green Belt was designed to prevent urban sprawl into the countryside and continues to be provided some protection against development by the NPPF. However, largely due to the flawed standard method, many of Sussex’s town and villages are

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now being expected to expand into their unprotected countryside (there is no Green Belt in Sussex).

Where the Green Belt was originally designated to restrict urban sprawl on those areas where development was deemed to be necessary, policy should now be strengthened to ensure that it maintains the intent. But now (largely due to the standard method), many non-Green Belt towns and villages are being required to accommodate a large increase in development although their rural outskirts gain minimal protection from NPPF policies. Consequently, PINS apparently regard rural areas on the edge of towns and villages as merely a resource available to site development.

So, the countryside in non-Green Belt Districts should be afforded considerably more protection from development in NPPF policies than currently available. This will allow rural dwellers and those living on the edge of urban areas to maintain a modicum of confidence in the planning system, which is currently sadly lacking.

10

Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?

We fully support the intent to prevent significant changes to the character of an area through densification and would welcome sight of a policy wording that defines what would be considered as a significant change.

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A significant change in character is subjective but clearly, the imposition of tall towers into an area of two-story housing is likely to be considered a significant change.

One change in character, however, that we suggest would be significant is green field development. What greater change could be envisaged to the character of an area than changing the countryside into an urban area? This is of far greater significance than changing the appearance of an urban area through densification – these areas are urban and will remain urban.

For far too long, policy makers, developers and some LPAs (notably urban LPAs) have regarded the countryside simply as a resource available and suitable for development. This approach must cease and rural Districts should be granted a measure of protection against development, e.g. development assessed from a justified need (not the ludicrous standard method) can only be permitted when all other options – brown field development, densification of existing urban areas etc. have been exhausted. Basically, development of the countryside should be the last resort, not the first.

11

Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?

No.

We consider that removal of the explicit requirement for plans to be justified is not to be welcomed. In many cases, NPPF policies are simply inadequate to reflect local circumstances or development constraints. The problem to date with plans having to be justified is the inordinate amount of evidence deemed

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necessary by PINS to demonstrate the effectiveness of the proposed policies. If PINS were content with a less rigorous requirement, much LPA time and effort would be saved during plan-making. It would, of course, be open to any who disagree with a policy(ies) to present contrary evidence at the examination, but this currently does occur.

Therefore, we consider that plans should continue to have a level of justification in order for the LPA to show the reason why a specific policy or allocation has been selected whilst other areas should be protected.

LPAs frequently commit a large amount of resource into the compilation of their Sustainability Analysis, but too often, this largely becomes a tick box exercise that bears only a passing resemblance to reality. Whereas the sustainability analysis is supposed to inform the policies in the local plan, it is suggested that often it is compiled after the policies have been constructed and the analysis finalised so that it then supports the policies. This makes the exercise a waste of time and resource. Thus, requirement for a sustainability analysis need to be re-thought so that the analysis more accurately reflects reality and better represent the justification of the plan policies.

12

Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

13

Do you agree that we should make a change to the Framework on the application of the urban uplift?

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Yes.

All too frequently the 20 largest urban areas look to their neighbours to help meet their need and this should be avoided. Most developers seek green field land on which to develop and shun brownfield land. This has to be discouraged and one way is the requirement for urban LPAs to look at their own land, not their more rural neighbours.

It should, however, be recognised that the 35% urban uplift and the so-called housing “need” is based on the standard method which together require an unsustainable level of new housing. If the standard method was to more realistically represent the housing need, there would be less call on neighbouring authorities to release land to meet this more rational need.

As with many of the other changes being proposed in this consultation, many only require changing because of the inflated housing need produced by the standard method. If, however, emphasis was placed upon providing homes that are truly affordable (for rent, shared ownership, or purchase) then the so-called housing crisis would considerably reduce.

14

What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

15

How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also

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functions as part of the wider economic, transport or housing market for the core town/city?

16 *Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?*

17 *Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?*

18 *Do you support adding an additional permissions-based test that will 'switch off' the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?*

Yes.

As LPAs have practically no influence over the build out rate after granting permission, it is iniquitous to penalise them with the presumption in favour of sustainable development when developers either delay starting building or alternatively, build slowly in order to support the price.

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As an example, Wealden has a current 5YHLS of 3.92 years and scored 82% in the 2022 HDT. On the basis of these two figures, inspectors frequently state that the District has a considerable shortfall in their housing supply and apply the presumption. Yet Wealden has currently granted permission for well over 8,000 dwellings that have yet to be built. Wealden's largest site, one for 1,000 homes, was granted outline permission in 2016, reserved matters in 2017 and construction started in 2018. Yet by April 2022, only 133 homes have been completed and at this rate, completion of development will not be until 2042, rather than the envisaged 2028.

The above example is typical of that found by Oliver Letwin in his 2018 review. What is so disappointing is the total lack of take up of Letwin's recommendations to improve the build out rate. That these recommendations were not welcomed by the development industry should not be of any concern to a government looking to improve affordability.

This developer gaming of the system would be partially neutralised if the presumption could be switched off by a permissions based test.

19

Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

Clearly a switch off figure is required given developer behaviour, but 115% appears high and 105% would be more appropriate for rural Districts like Wealden where there is a history of all major

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applications and the vast majority of non-major applications all being fully built out.

Therefore, we suggest that the 115% could remain as the default figure but where an LPA can justify an alternative level, this should be accepted.

20

Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

21

What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

22

Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

Yes.

Typically, most new developments do not contain sufficient homes for social rent, these being the type of homes most needed in rural districts and policies should ensure that these are increased in number.

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As the NPPF does not differentiate between the various tenures of affordable housing, developers do not deliver homes for social rent instead providing the more profitable shared ownership.

The government should follow the recommendations included in Letwin's 2018 review of build out rates.

The calculation of the formula rent for social homes uses local income data and it should be straightforward to understand how many households require a social home and then local policies constructed accordingly.

23

Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

Yes.

However, any amendment to the NPPF should wait until the older people's taskforce has reported.

24

Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

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25 *How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?*

26 *Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?*

Yes.

The majority of the Registered Providers lack interest in operating a small number of homes despite the need for these in rural areas. Thus, any measures that would overcome this constraint is to be welcomed.

27 *Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?*

28 *Is there anything else that you think would help community groups in delivering affordable housing on exception sites?*

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29 *Is there anything else national planning policy could do to support community-led developments?*

30 *Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?*

Yes.

31 *Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?*

32 *Do you agree that the three build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?*

33 *Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?*

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34 *Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places', to further encourage well-designed and beautiful development?*

35 *Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?*

36 *Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?*

37 *How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?*

38 *Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current*

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references in the Framework on best most versatile agricultural land?

39 *What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?*

40 *Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?*

41 *Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?*

42 *Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?*

43 *Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?*

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44 *Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?*

45 *Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?*

46 *Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?*

47 *Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?*

48 *Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?*

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49 *Do you agree with the suggested scope and principles for guiding National Development Management Policies?*

No.

Currently, the concept of National Development Management Policies is flawed and despite government protestations to the contrary, it represents a loss of local democracy and a power grab by government.

The thinking that centralised policies can reflect local circumstances is delusional; it may appeal to a one-party state administration but is wholly inappropriate in a democracy.

Should the government be wedded to the introduction of these policies, they should be only a guide or a template and LPAs should be free to include justified alternative policies in their local plans.

50 *What other principles, if any, do you believe should inform the scope of National Development Management Policies?*

NDMPs should be considered a guide and not be mandatory.

51 *Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?*

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52 *Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?*

53 *What, if any, planning policies do you think could be included in a new framework to help achieve the twelve levelling up missions in the Levelling Up White Paper?*

54 *How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?*

55 *Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?*

Yes.

Existing policy is failing to prioritise brownfield development over greenfield development and developers are mostly ignoring brownfield sites. Therefore, greenfield development of areas not allocated in local plans should not be permitted where suitable and available brownfield sites exist in nearby urban areas.

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56 *Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?*

57 *Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?*

58 *We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.*
