

By email to: TechnicalPlanningConsultation@communities.gov.uk

Dear MHCLG

I write in response to the consultation on “Changes to the current planning system”. I endorse the cross party response that has been submitted by the Local Government Association (LGA), and add this response on behalf of the LGA Liberal Democrat Group.

Please note, we do not consider that the term “affordable housing” is appropriate, as in many areas it is anything but affordable to local communities. Throughout the document we have therefore replaced the term with “homes local people can afford”. We also believe that more emphasis should be placed on the delivery of socially rented housing.

We have not written answers to the individual questions, however we have separated our response into the four different themes.

The proposed new standard method for assessing local housing need

Firstly, we note that this is the third consultation in as many years on the standard method for assessing local need. We frequently hear from Central Government that councils, communities and house builders need more certainty, and yet the goal posts on housing numbers keep changing. Moreover, we do not understand why any of the proposals in this document are being considered right now, when there is an ongoing consultation on the wider reforms in the Planning for the Future White Paper.

That said, we are concerned that the proposed methodology for assessing local housing need will not actually deliver the type and tenures of housing that is needed by local communities, in the places where it is most needed. Setting top down targets like this fails to understand or recognise local economic circumstances, land values and geographical constraints. We frequently hear complaints from rural areas that they are only getting large “executive homes” when what they need is homes that local people can afford, and urban areas where young people cannot afford to live in the city where they grew up and where they work. Setting targets in this way will also not necessarily lead to the delivery of the number of homes specified, and may actually lead to more councils being penalised on the housing delivery test because the developers - despite

having their planning permissions approved - are slow in building out their schemes. This in turn could lead to uncontrolled and inappropriate development in unsuitable locations under the “presumption in favour of development” rule. Councils need to be given the resources and the ability to ensure that schemes which they have given permission for are built out in a timely manner, before forcing them to increase their targets further.

Conversely, where councils have been proactive in identifying land for housing it is not helpful for them to now be told to reduce their numbers. This risks undermining local and neighbourhood plans and may lead to confusion and frustration for those councils and their communities.

In relation to transitional arrangements, as previously stated – we can see no reason for making changes now when the formula may change again with the reforms in the White Paper. That said, if the Government insists on making these changes then it is essential that there is a transitional period for councils who will be at different stages of their local plan preparation and adoption.

First Homes

We do not have an objection to the principal of First Homes being included as an option for delivering discounted market housing however, we do not agree that they should be a mandatory component of the contribution on a private development towards homes local people can afford. Many councils already struggle to achieve the necessary quantum of homes for social rent on private developments and this should not be diluted further by insisting that a proportion of housing is for First Homes. We believe that in many areas First Homes will still be unaffordable for large sections of the population, and therefore they should be an optional choice for individual councils depending on local need.

If First Homes are introduced as a mandatory component of the homes local people can afford, councils should be able to determine the level of discount that is given. Homes for sale at 30% discount will be out of reach for many first time buyers, and even at 50% discount would still be unaffordable in some areas.

Small sites planning policy

We do not agree that the site size requirement for providing homes local people can afford should be raised to 40 or 50. The Government has already introduced a number of permitted development rights that require no contribution to homes local people can afford, or to infrastructure, which has undermined the ability of councils to deliver the homes their communities need, at the right price, in the right location.

Raising the threshold may also lead to larger sites being divided up into smaller blocks of 40 or 50 at a time to avoid the contribution, which would further undermine the overall delivery of homes local people can afford. If developers are unable to deliver the numbers that have been declared as viable in a local plan, that has been found sound by a Planning Inspector, then it is an issue with the land prices and build costs that needs to be resolved.

Whilst we are conscious that the current COVID 19 situation has created some challenges for the economy, including in housebuilding, we do not agree that the threshold should be increased even on a temporary basis.

Extension of the Permission in Principle consent regime

We do not agree that Permission in Principle should be extended to major development, and we note that the proposed reforms in the White Paper may deal with this as part of the overhaul of the system so it shouldn't be changed now.

Public Sector Equality Duty

We believe that any proposals to reduce the amount of social or discount rent housing delivered will impact negatively on those in our communities who are most socially and economically disadvantaged.

Yours Faithfully

A handwritten signature in dark ink, reading 'Cllr Adele Morris'. The signature is written in a cursive, flowing style.

Councillor Adele Morris