Community Planning Alliance

Over 700

campaigns on the map

Agenda

- Introduction
  - How to respond
  - Survey
- Targets
- Green Belt & Sustainability
- Viability
- Your comments and questions

How to respond

- Fill in our survey (in the chat). Share it!
- Respond to the government:
  - Google NPPF Consultation 2024
  - Deadline 24 September
  - Consultation email: PlanningPolicyConsultation@communities.gov.uk
  - Make sure you answer YES or NO, as they will count statistics

Survey results so far

%	Question
84%	housing won't be more affordable
84%	'affordable' won't be delivered
80%	waiting lists won't drop
95%	must do more to involve communities

%	Question
73%	food security is as important as housing (strongly)
76%	'grey belt' not a good idea(strongly)
84%	not doing enough to protect nature
87%	unacceptable loss of countryside

Targets

Housing Targets – Manifesto vs Now

- Labour's Manifesto: **1.5 million homes** over 5y Parliament
- = **300,000 dpa**
- These proposals: **>1.85 million homes**
- = **371,500 dpa**
- **PLUS** New towns of **10-25,000** dwellings each
- Current Delivery 2021-22 = **229,000 dpa**
  (new build 178,000 + conversions)

Why.....

Do they believe this will make housing affordable?

Mandatory Method – Questions 1 & 2

Delivering a sufficient supply of homes – proposal is to reverse previous changes to Paras 60 and 61

Para ~~60~~ 61. New text removes caveats: ~~*as much of*~~ *and* ~~*as possible*~~

Para ~~61~~ 62. New text removes several sentences*:*

~~*The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances including relating to the particular demographic characteristics of an area*~~[26] ~~*which justify an alternative approach which to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals.*~~

Standard Methodology Comparison – Qs 15 to 19

Current SM	Proposed SM
Start with household projections (2014-based), take a 10-year average from current year	Start with the current housing stock levels (2023);
Apply a 0.25 multiplier (adjustment factor), calculated using latest median workplace-based affordability ratio (if house prices more than 4x earnings)	Multiply this by 0.8% (average 10-year stock increase over England is 0.89%)
	Apply a 0.6 adjustment factor, calculated using 3-year average median workplace-based affordability ratio (if house prices more than 4x earnings)
20 largest urban areas nationally – apply a further 35% uplift Cap at 40%, where appropriate	Aim: areas with greatest affordability pressures

The new Algorithm for housing “need”

Dwelling Stock instead of household projections

Multiply by 0.8%

New method uses **0.6** as compared to 0.25 for the weighting

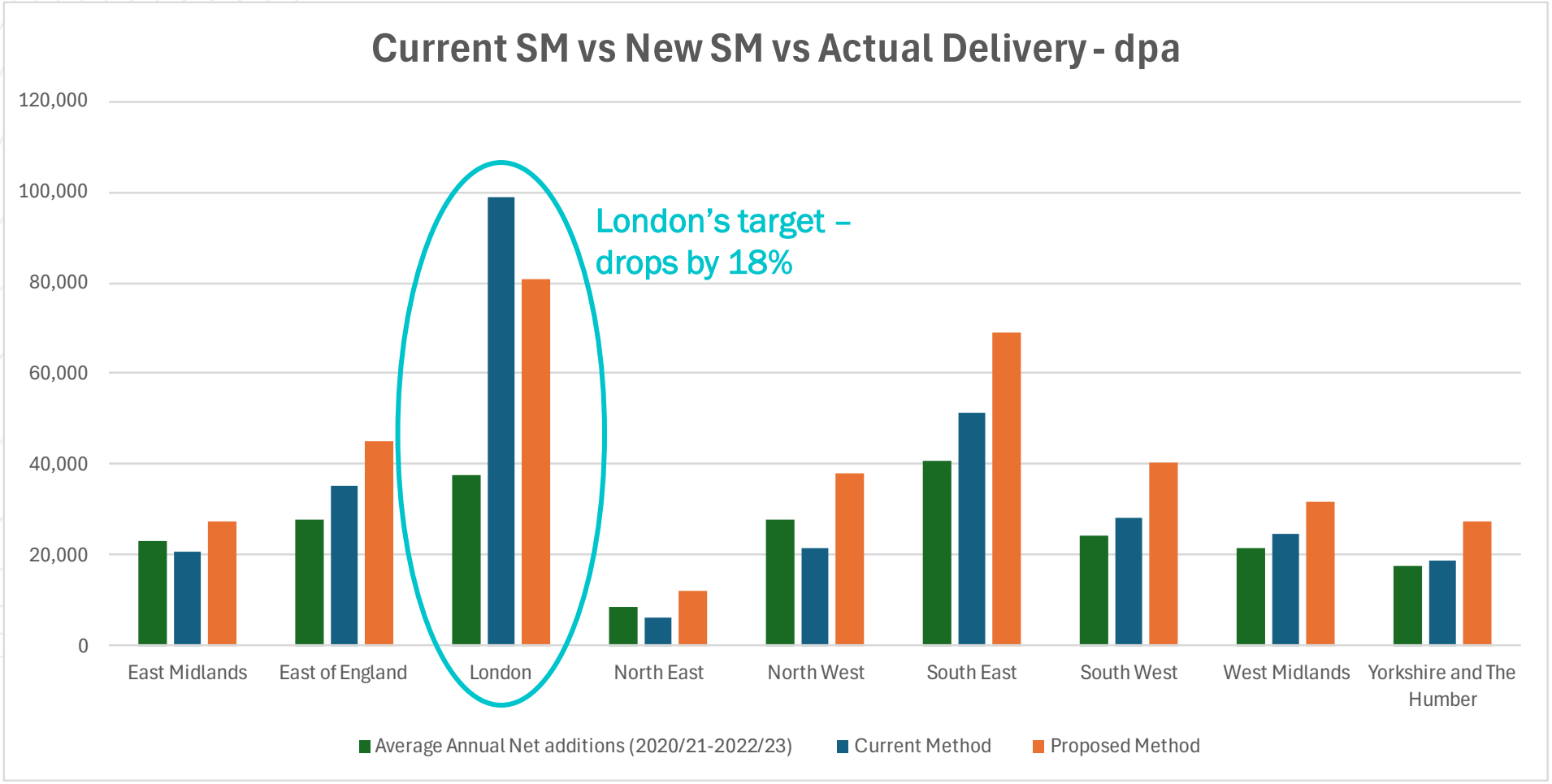
$$LHN_t = Dwelling\ stock_{t-1} \times 0.8\% \times (1 + Adjustment\ Factor)$$

$$Adjustment\ Factor = \frac{(Three\ year\ average\ affordability\ ratio) - 4}{4} \times 0.6$$

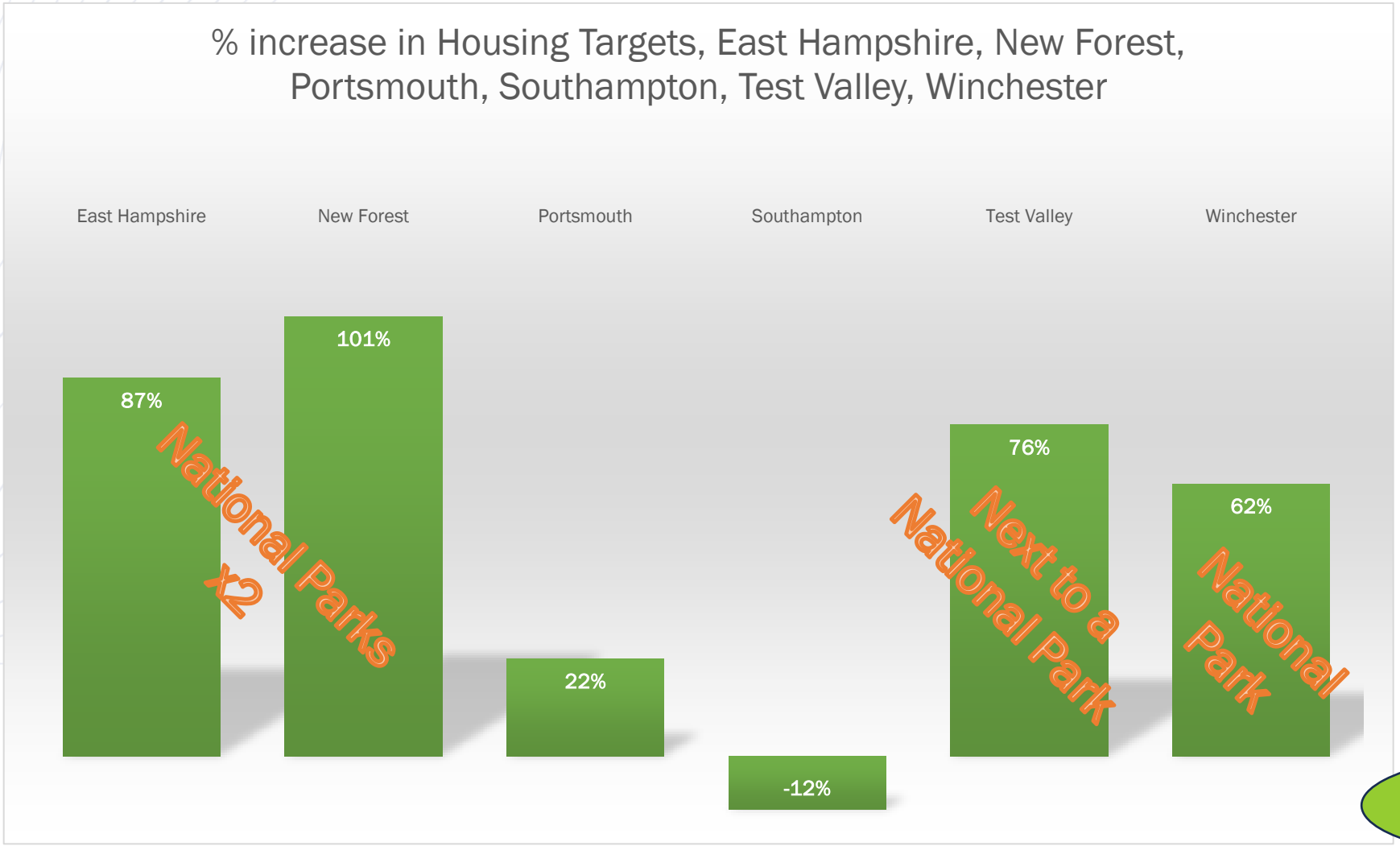
- Want to go lower? ‘Hard constraints’
  - Density
  - Sharing with neighbours
  - GB boundary review

‘Straightforward’?

What is the Result – by Region



What is the Result – City vs Rural



'Balanced' distribution?

The dreaded ‘presumption’…

- Tilted Balance– Questions 3 & 6
- “*reinstating the requirement to demonstrate a 5YHLS at all times is likely to bring more local planning authorities into the scope of the presumption in the short-term.*”
- *11d) where there are no relevant development plan policies, or the policies* ***for the supply of land***[8] ~~*which are most important for determining the application*~~ *are out-of-date*[9]*, granting permission unless:……..*
- Footnote 7 (the get-out clause) still includes Green Belt and AONBs (now ‘National Landscapes’)

5YHLS and Buffers

- Questions 7 to 11
- Bring back the requirement for a 5YHLS across the board.
- Remove the ability to use past oversupply.
- Bring back requirement for an additional 5% buffer for all 5YHLS and delete annual position statements.

7 Targets asks

1. Evidenced need: who are the houses for and how affordable?
2. Census data/Household formation (up-to-date)
3. Social housing targets (funded…)
4. Affordable based on household income
5. Input from LPA: Strategic Housing Market Assessment
6. Remove presumption in favour of development
7. Retain oversupply wording

Green Belt & Sustainability

Need More Emphasis - Move to Main Text

Footnote 7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote ~~7~~42); and areas at risk of flooding or coastal change.

Footnote 63 Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. ~~The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.~~ [restore deletion]

Proposals Affecting Green Belt Land

- Labour's Golden Rules
  - Prioritising Brownfield Land
  - Building on the Grey Belt
  - Affordable Homes
  - Boost Public Services and Infrastructure
  - Improve Genuine Green Spaces

But.....

Will these proposals be effective?

Let’s look at some of the proposed changes

- Draft NPPF https://assets.publishing.service.gov.uk/media/66acffddce1fd0da7b593274/NPPF_with_footnotes.pdf
- Prioritising Brownfield (paragraphs 122c, 130)
- Building on the Grey Belt (paragraphs 144, Grey Belt Definition)
- Affordable Homes (paragraphs 63, 64 and 155)
- Boost Public Services & Infrastructure (paragraphs 24, 27a, 97, 98 112a, 113)
- Improve Genuine Green Spaces (paragraph 156)
- Green Belt Policy Changes (paragraph 142, 147, 152, 155, 157)

Sustainable Development

What does it really mean?

Just a reminder about the words from the National Planning Policy Framework:

"***At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs***".

So, what does sustainable development really mean?

- **The creation of a range of housing and employment opportunities to meet local needs?**
- **The use of sustainable materials in the development process?**

- **Ensuring there are sufficient school places and health services provision to meet community requirements?**
- **Ensuring there is sufficient access to Green Spaces and other amenities, including retail, entertainment, etc?**

- **The implementation of sufficient sustainable freight & passenger transport to reduce the need to travel by private car or HGV?**
- **Ensuring the development does not exacerbate the effects of climate change (ie resulting in increased flood risk, carbon emissions, or air, noise, light, vibration or water pollution)?**
- **Enabling the protection of natural capital assets, supporting nature's recovery and future food security?**
- **Ensuring there is a diverse range of employment opportunities to enable access to jobs and career progression?**

Call for Evidence!

There are insufficient protections in legislation, regulation or policy for land that supports climate mitigation, nature's recovery or future food security.

It is sacrificed without appropriate evidence – we should understand, for example, for all Plans, allocations and alternatives, the:

- Natural Capital Value of the land to be lost
- Ecological Impact of proposed development
- Carbon Emissions Implications of the Plan as a whole
- Impact on the Rural Economy and food security

Viability

Targets on steroids, promises on placebos

Promises, promises

If the NPPF promises are not viable, they will not be delivered

Remember, for housebuilders:

- Margins over volume
- Output restricted to keep prices high
- Profits protected by planning guidance (15-20%)

Barratt has already pulled 3 planning applications because 50% renders scheme unviable.

NPPF Viability

- Golden rules
  - 50% ‘affordable’ (appropriate proportion social rent). Subject to viability
  - ‘necessary improvements’ to local or national infrastructure. Define ‘necessary’.
- New towns 40% ‘affordable’. No chance. New towns already unviable.

- Ironically: “Responsibility of plan-makers to create realistic, deliverable policies”

NPPF: Setting Existing Use Value

- Gov't suggests need for land value guidelines in Green Belt
  - Rate yet to be determined

- Don't fix land values, use this:

"The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan."

Para 002 https://www.gov.uk/guidance/viability

- Remove all 'subject to viability' references.

Large settlements

Industry concerns about how difficult it is to deliver very large settlements

"Q13 Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?"

- Need: robust viability assessments for all new settlements to ensure they can deliver infrastructure and affordable
- (Spoiler alert: they can't: Viability, viability, viability!)

7 viability asks

1. No viability opt-out
2. No fixed benchmark land value: use existing guidance
3. Impact study: what if policies can’t be delivered?
4. Community Infrastructure Levy (+s106) everywhere
5. Government funding for new towns and social housing
6. Workplace charging/local congestion charging to pay for public & active travel
7. No removal of CPO hope value

Thank you for listening

Community Planning Alliance

IMAGINE.

IF LOCAL COMMUNITIES COULD INFLUENCE PLANNING

Join us to help make sure that is a reality

HOMES FOR NEED, NOT HOMES FOR GREED.

There are 1 million homes not lived in, 1 million planning permissions not built out and 1 million brownfield sites suitable for housing.

The right homes for local need

TAKE A STAND FOR A GREEN AND PLEASANT LAND

The right homes for local need

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