

DRAFT RESPONSE SERVICE

As part of the Rural Opportunities Bulletin, RSN will regularly provide concise potential responses to key current consultations. These are not intended to be definitive or to reflect the views of RSN and may include potentially opposing responses to reflect different views designed to assist individual organisations in compiling their own response. We do however recognise the pressure members are under and we hope this service will assist.

Planning for the right homes in the right places: consultation proposals – Department for Communities & Local Government consultation

This consultation sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth.

Proposals include:

- a standard method for calculating local authorities' housing need
- how neighbourhood planning groups can have greater certainty on the level of housing need to plan for
- a statement of common ground to improve how local authorities work together to meet housing and other needs across boundaries
- making the use of viability assessments simpler, quicker and more transparent
- increased planning application fees in those areas where local planning authorities are delivering the homes their communities need

The attached 'Housing need consultation data table' sets out the housing need for each local planning authority using the government's proposed method, how many homes every place in the country is currently planning for, and, where available, how many homes they believe they need.

Alongside this consultation, the attached 'Comprehensive registration programme: priority areas for land registration' document lists those areas where Her Majesty's Land Registry intends to prioritise the registration of ownership of all publicly held land.

This consultation closes on 9 November 2017.

<https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

Suggested potential responses to a selection of the questions posed are set out below.

Question 1: *Do you agree with the proposed standard approach to assessing local housing need? If not, what alternative approach or other factors should be considered?*

A standard approach to assessing local housing need will undoubtedly save local authorities a great deal of time and resource. As set out in the introductory paragraphs to the consultation document, it is critical that any approach recognises the constraints to development in particular areas (National Parks, AONBs, SSSIs etc) and also the affordability of housing to local people who need to live and work there.

Unfortunately, the proposed approach seems to simply propose a mechanism for identifying housing demand in each local authority area rather than need. The proposed approach will simply reinforce existing market trends rather than lead to the construction of homes where they are actually needed.

There is no reference to housing type or tenure and there is a significant risk that the result will simply be more executive homes built in high demand areas with problems elsewhere not addressed.

In addition, whilst the proposals allow areas wishing to build more homes than the suggested target to do so, there is no accommodation for areas which may be constrained by environmental and sustainable community considerations.

Question 2: *Do you agree with the proposal that an assessment of local housing need should be able to be relied upon for a period of two years from the date a plan is submitted?*

There needs to be stability in relation to the planning process. A two year time horizon within which statistics will be valid seems far too short to achieve such stability. A longer period should be considered.

Question 3: *Do you agree that we should amend national planning policy so that a sound plan should identify local housing need using a clear and justified method?*

Requiring a clear and justified methodology with respect to creating a sound plan is a sensible approach.

Question 4: *Do you agree with our approach in circumstances when plan makers deviate from the proposed method, including the level of scrutiny we expect from Planning Inspectors?*

A flexible approach for National Park authorities and others is welcome. The need for compelling reasons to deviate from the proposed approach should apply equally to those seeking to build more and those seeking to build less homes than the target suggests. There should be some form of indication as to the nature of potentially acceptable reasons set out in the consultation. This will help local authorities to assess properly whether they are likely to be able to pursue an alternative methodology before embarking on a particular course of action and, potentially, wasting resources.

Question 6: *Do you agree with the proposed transitional arrangements for introducing the standard approach for calculating local housing need?*

It is important to recognise the time and resource already committed by many local authorities in progressing their plans and to ensure that this is not wasted by a change on the methodology agreed. This recognition, as outlined in Table 1 of the consultation document, is welcomed.

Question 11:

a) should a local plan set out the housing need for designated neighbourhood planning areas and parished areas within the area?

b) do you agree with the proposal for a formula-based approach to apportion housing need to neighbourhood plan bodies in circumstances where the local plan cannot be relied on as a basis for calculating housing need?

The proposed approach is crude, to say the least, and takes no account of differences in settlements, population trends, policy and needs for individual communities.

Neighbourhood Plans have the opportunity to be based upon much more detailed local analysis of issues, housing need and other factors and should be enabled to identify a different housing need figure based upon this analysis.

At the very least, Neighbourhood Plans should be encouraged to break down identified need into levels of affordability, housing tenure and type required to meet the needs of local people.

Question 12: *Do you agree that local plans should identify the infrastructure and affordable housing needed, how these will be funded and the contributions developers will be expected to make?*

Yes. It is essential that the affordable homes requirement is set out clearly as part of the Plan and that developers are clearly expected to meet this requirement.

Question 14: *Do you agree that where policy requirements have been tested for their viability, the issue should not usually need to be tested again at the planning application stage?*

Yes. This is a very welcome recognition of the need for certainty and will greatly assist local authorities in avoiding unnecessary expense at planning application stage. It will also provide clarity for developers as to what must be provided as part of any scheme.