

Wantage and Grove Campaign Group



Changes to the current planning system 2020

Dear Sir/Madam

This is our submission to the consultation on the Changes to the Current Planning System 2020.

Introduction

1. This submission covers the following points:
 - 1.1. Information about the Wantage and Grove Campaign Group
 - 1.2. Our response to the Consultation on the proposed Changes to the Current Planning System.
 - 1.2.1. Overview
 - 1.2.2. The standard method for assessing housing numbers in strategic plans
 - 1.2.3. Delivering First Homes
 - 1.2.4. Supporting small and medium-sized developers
 - 1.2.5. Extension of the Permission in Principle consent regime
 - 1.2.6. Public Sector Equality Duty

Information about the Wantage and Grove Campaign Group

2. We are the Wantage and Grove Campaign Group, a non-party-political group of over 1000 individuals who live in and around Wantage and Grove (mainly in the OX12 postcode area) in Oxfordshire. We are not against any development in Wantage and Grove but:
 - 2.1. Developments should be proportionate and sustainable; and
 - 2.2. The infrastructure should enhance and improve quality of life for its residents.

Our response to the Consultation on the proposed Changes to the Current Planning System.

The standard method for assessing housing numbers in strategic plans

3. Paragraph 41 concludes that the result of the revised standard method “will make the most of our transport hubs, support the objectives of brownfield-first and gently densifying urban areas, including building upwards where appropriate.”
 - 3.1. Is densifying urban areas still a valid objective when the Covid-19 crisis has clearly demonstrated the need for more space to work from home, travel and exercise in a covid secure way?
 - 3.2. How does the revised method support the objectives of brownfield-first and gently densifying urban areas? We do not believe that the revised method supports the objective of brownfield first and densifying urban areas. The method simply increases the numbers of

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units which should be approved within a local plan, leaving developers to prioritise where and when these units will be built since, as usual, looking at those that will generate the highest profit first. Densification and brown-field development will be slower as it is usually much less profitable.

Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is *whichever is the higher of* the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?

A1 No

A1.1 The purpose of the ONS household projections is to project the number of homes needed in any particular area based on historical information. If these projections do not provide the correct figures then there is something wrong with the way in which the projections are derived.

A1.2 This is only the baseline for the standard calculation and is then adjusted so why move away from independent figures calculated by the ONS?

A1.3 If a figure of 0.5% of housing stock is to be used then it should be adjusted to take account of the permissions granted but not built. Land banking can be a significant factor when looking at the housing potential for an area. It provides a means for developers to influence the figures.

Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

A2 No

A2.1 Simply basing a housing figure on a percentage of the current housing stock seems to be a very blunt instrument and assumes that saturation cannot be reached. It also takes no account of the employment potential in the area. For example, the closure of a large employer would mean that the housing need may decrease in an area.

Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

A3 No

A3.1 The basic premise on which these proposals are based is that developers will build enough to reduce the prices and improve affordability. This is blatantly untrue. Developers are focused on providing shareholder capital improvement and this can only be achieved by increasing the profitability of the business overall. They will continue to restrict supply to maintain prices and hence profitability.

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A3.2 This takes no account of the need for social housing. Many people on low incomes or zero hours contracts will never be able to buy a home and will rely on social housing. Local Councils have estimated that there is a need to build up to 100,000 social housing units per year and given the post covid world that we may eventually move towards this need will only increase with higher levels of unemployment.

A3.3 Any calculation of housing growth should include a projection of the number of people in the area on the housing lists and the availability of social housing. Given the Right-to-buy scheme the demand for social housing units will continue to remain high and consistently so.

Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

A4 No

A4.1 We do not believe that affordability has anything to do with house building as developers will always restrict supply to maintain prices.

Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

A5 No

A5.1 We do not believe that affordability has anything to do with house building as developers will always restrict supply to maintain prices.

A5.2 The statement in paragraph 31 that “High house prices indicate a relative imbalance between the supply and demand for new homes, making homes less affordable. The affordability of homes is the best evidence that supply is not keeping up with demand” is only true because developers are restricting supply to maintain prices and profitability. High house prices mean that developers are ensuring a return for their shareholders by restricting supply. This will only change if government funded development takes place to eliminate the profit motive.

A5.3 More than 1,000,000 homes have already been granted planning permission and are not being built, not because of problems with the planning system but because developers maintain prices by restricting supplies of new homes.

A5.4 We believe that there should be a time limit on the timeframe in which a site has to be started and that a low and high rate of build should be part of the approval. No build or simply dig a trench should not be acceptable. If a minimum build rate is included in the application then more permissions might turn into homes rather than land banks.

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:

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Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination? If not, please explain why. Are there particular circumstances which need to be catered for?

A6 No

A6.1 This is not sufficient time to allow for the increase in housing numbers and the review of sites for inclusion which this will entail.

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:

Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate? If not, please explain why. Are there particular circumstances which need to be catered for?

A7 No

A7.1 This is not sufficient time to allow for the increase in housing numbers and the review of sites for inclusion which this will entail.

Delivering First Homes

4. Paragraph 46 states that polling shows that 87% of people would prefer to own a home given a free choice, but that high prices, high deposits and difficulty accessing mortgage finance still mean that far too many people are denied this opportunity. No reference is made to the need for a mortgagee to be in stable employment with an above average salary. The increasing levels of unemployment and increasing tendency for zero hour contracts will increase the number of people unable to obtain mortgage finance. The number of zero hour contracts has increased from less than 200,000 in 2010 to more than 900,000 today and gives those workers no opportunity to buy their own homes, increasing the need for social housing.

Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):

- i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.
- ii) Negotiation between a local authority and developer.
- iii) Other (please specify):

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A8 We believe that the delivery of social rented units is essential to the growth of the number of homes in the country and therefore any proposal which allows developers to reduce the number of homes for social rent provided should be resisted.

With regards to current exemptions from delivery of affordable home ownership products:

Q9: Should the existing exemptions from the requirement for affordable home ownership products (eg. for build to rent) also apply to this First Homes requirement?

A9 Only for the portion of the exception which relates to social rent units.

With regards to ownership products:

Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.

A10 No comment

With regards to current exemptions from delivery of affordable home ownership products:

Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views:

A11 No comment

Q12: Do you agree with the proposed approach to transitional arrangements set out above?

A12 Yes, partially

A12.1 Six months is the minimum time. A great deal of time and money has been spent developing plans and engaging with residents, developers and councillors and this would be wasted if plans had to be thrown out.

A12.2 Paragraph 58 proposes that “the local authority should have flexibility to accept alternative tenure mixes, although they should consider whether First Homes could be easily substituted for another tenure, either at 25% or a lower proportion.” We would be very concerned if this impacted on the number of social rental properties available.

Q13: Do you agree with the proposed approach to different levels of discount?

A13 Yes,

A13.1 We agree that the minimum discount for First Homes should be 30% from market price and that local authorities should have discretion to increase the discount to 40% or 50%.

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Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?

A14 No

A14.1 We do not agree that the affordable homes delivered should be First Homes for local, first-time buyers. We agree that the proportion of the affordable homes which would have been discounted purchases could be First Homes but that social rental properties should remain.

Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?

A15 No,

A15.1 We believe that the National Planning Policy Framework threshold on site size which requires “the Entry-level exception sites to be larger than one hectare in size or exceed 5% of the size of the existing settlement” is good and ensures that a mix of dwellings is available in any settlement.

Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas?

A16 No,

A16.1 We believe that if First Homes are to be a valuable part of the affordable homes portfolio, they should be available in rural locations as well.

Supporting small and medium-sized developers

Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?

A17 No,

A17.1 A development of 40 or 50 units is not a small development in many parts of the country and is a site size attractive to all developers not just SMEs. These sites should be treated in the same way as larger developments.

Q18: What is the appropriate level of small sites threshold?

- i) Up to 40 homes
- ii) Up to 50 homes
- iii) Other (please specify):

A18 Other – up to 10 properties should remain the threshold.

Wantage and Grove Campaign Group Comments - continued

Q19: Do you agree with the proposed approach to the site size threshold?

A19 No,

A19.1 As is recognised in paragraph 81 there could be adverse threshold effects whereby developers attempt to bring forward larger sites in phases of up to 40 or 50 homes to avoid contributions. Placing the onus on local planning authorities to try to secure contributions for affordable housing where it may become apparent that a larger site is being brought forward will be too late as developers may sell on potential sites to other developers and attempt to get around the policy.

Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?

A20 No

A20.1 It should not be raised at all.

Q21: Do you agree with the proposed approach to minimising threshold effects?

A21 No

A21.1 These will not work in practice, it will just create more work for developers and LPAs to try to ensure that the policy is followed.

Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?

A22 Yes, the current threshold should be retained.

Q23: Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?

A23 No comment.

Extension of the Permission in Principle consent regime

Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?

A24 No

A24.1 We believe that given the climate emergency, the importance of Environmental Impact Assessments is such that they must form part of any outline application and removing the restriction will mean that permission could be granted without the need for an EIA.

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A24.2 In addition, an EIA would include a heritage statement which would identify the possibility of any archaeological remains which should be investigated. Sites once destroyed cannot be recovered.

Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.

A25 Yes

A25.1 We do not believe that the restriction on major developments should be removed but if it is, then the amount of commercial development must be set in the same way that the maximum number of housing units should be in the Permission in Principle.

Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

A26 No

A26.1 See our comments above. Given the climate emergency, the importance of Environmental Impact Assessments is such that they must form part of any outline application and removing the restriction will mean that permission could be granted without the need for an EIA. If the restriction on major developments should be removed then an EIA (including a heritage statement) must be required prior to Permission in Principle being granted.

A26.2 We are pleased to see the comments in paragraphs 96 and 97 but would prefer the limit to be reduced from 150 dwellings to 50 dwellings.

Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.

A27 Yes,

A27.1 Height is a key component of the scale of development and must form part of the Permission in Principle.

Q28: Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:

- i) required to publish a notice in a local newspaper?
- ii) subject to a general requirement to publicise the application or
- iii) both?

Wantage and Grove Campaign Group Comments - continued

iv) disagree

A28 Both.

A28.1 All Permission in Principle applications should be subject to the same publicity arrangements as any outline application to ensure open democracy.

Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap?

A29 No comment.

Q30: What level of flat fee do you consider appropriate, and why?

A30 No comment.

Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.

A31 No comment.

Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.

A32 No comment.

Regulatory Impact Assessment

Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?

A33 No comment.

Regulatory Impact Assessment

Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.

A34 No comment.

Public Sector Equality Duty

Wantage and Grove Campaign Group Comments - continued

Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty?

If so, please specify the proposal and explain the impact. If there is an impact – are there any actions which the department could take to mitigate that impact?

A35 No comment.

30 September 2020