

Changes to the current planning system
Consultation on changes to planning policy and regulations
Submission by Hallow Parish Council, Worcestershire

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?

The use of the latest household projections averaged over a 10-year period to calculate the baseline need is not appropriate. In effect this would disadvantage those rural parishes that have already taken considerable housing, and result in the over-build of category 1 villages beyond what is sustainable. Hallow Parish has already seen 131 houses built with more assigned on top of a census 2011 housing figure of 532 households. The projected uplift up to 2041 under the revised South Worcestershire Development Plan will be difficult to absorb, with consequent pressures on local infrastructure. The proposed methodology will have considerable negative impact. The methodology may well boost supply in the South East where it is most needed, but the negative impact on many rural parishes in other parts of England need to be considered. Using growth rather than need creates a bias in the housing system, in effect punishing those villages who have met recent need (and in some cases, like Hallow have gone beyond local need). This, combined with high average house prices, a bias towards large executive homes and lack of genuinely affordable homes locally distorts provision away from parish-based need.

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.

See response to Question 1

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.

Yes. However, difficulties will remain where large national developers "land bank" against future house pricing uplift, and where the gap between local earnings, particularly in the public sector, and local house prices remains overly large.

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

In our view this is best done at Local Planning Authority level with greater powers to respond to local need, and further consideration should be given to strengthening the powers of Neighbourhood Development Plans and Neighbourhood Development Orders to bring forward genuinely affordable housing matched to Parish need.

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?

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?

The transition periods, including for Neighbourhood Development Plans should be 12 months. At present a number of local NDPS are on hold due to Covid 19, and the progress of the Local Plan has been similarly impinged. As Covid 19 is likely to impact until well into 2021 we think a longer transition period will be required. Given that most work on NDPs is done free by volunteers, with the support of local communities, it is imperative that this work is not nullified by a transition period that is too short. Many such plans will not now be completed or accepted until late 2021.

Delivering First Homes

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)**

This is generally welcome, but is not nuanced enough to reflect parish led need. Difficulties locally are an ageing population wishing to downsize, and growing families needing to upsize to affordable homes, including homes for sale as well as social housing. The changes do not reflect the challenges of an ageing population within rural areas in England and Wales, west Worcestershire for example has one of the oldest populations in England.

Affordable housing in many rural parishes is a key issue, with a large gap between earnings and house prices, and a bias towards to executive homes with high pricing. This is trapping many growing families into unsatisfactory housing. It is not clear how this will be addressed by the current proposals.

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

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impact until well into 2021 we think a longer transition period will be required. Given that most work on NDPs is done free by volunteers, with the support of local communities it is imperative that this work is not nullified by a transition period that is too short. Many such plans will not now be completed or accepted until late 2021.

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

We agree with SWCs answer- No, a site size threshold should remain. *“Proportionate in size to the existing settlement”* is too vague. We support that local authorities in consultation with local parishes, especially those completing NDPs, could set their own thresholds.

A lack of restrictions on size could lead to unsustainable developments in inappropriate locations. There are already examples in Worcestershire.

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?

We agree with the answer provided by South Worcestershire Councils- No, LPAs have adopted planning policies which set out the thresholds that are appropriate for their area based on local evidence; these policies have been through Examination and found to be sound. Also, there is no evidence to suggest that locally market led housing schemes on small sites cannot afford to deliver the required element of affordable housing. If there are issues of viability of schemes then these can currently be pursued through the submission of a Viability Assessment for the site.

In addition, we agree with SWCs answer that: The affordability of new housing is problematic in many areas and the introduction of a considerably higher national threshold will mean that many developments will no longer deliver housing that is affordable to local people, particularly for first time buyers, young people and families. This will impact on communities in villages, rural towns and smaller cities where there are often fewer opportunities for larger sites to come forward. The introduction of the new national threshold would effectively mean that most sites in these locations would not include any affordable housing which would result in fewer local people being able to access the affordable housing that they need. This is particularly acute in parishes like Hallow which has seen a disproportionate amount of executive housing, adding to car commuting to the West Midlands conurbation, and pressure on the rail network around Worcester. It also fuels ‘Nimbyism’ when housing locally is unaffordable to those in the parish, or who work in the parish.

We agree that the government proposals to exempt affordable housing contributions on sites of up to 40 or 50 dwellings, with the exception of Designated Rural Areas, will reduce the amount of affordable housing delivered in areas of greatest need and appears to be somewhat at odds with the intentions of First Homes initiative. It will do little to aid those hard-working families trapped in inappropriate housing.

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

We agree with the response of SWCs. No. LPAs have adopted planning policies which set out the thresholds that are appropriate for their area based on local evidence; these policies have been through Examination and are fit for purpose. The affordability of new housing is problematic in many areas and the introduction of a considerably higher national threshold will mean that many developments will no longer deliver housing that is affordable to local people, particularly first time buyers, young people and families. This will particularly impact on communities in villages, rural towns and smaller cities where there are often fewer opportunities for larger sites to come forward. The introduction of the new national threshold would effectively mean that most sites in villages and smaller towns would not include any affordable housing which would result in fewer local people being able to access affordable housing that they need. In addition, the proposal appears to be in conflict with the promotion and use of Neighbourhood Development Plans to bring forward local and parish based housing. In our view, NDPS and indeed Neighbourhood Development Orders should be strengthened and not weakened.

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

Do not agree-this is likely to fuel inappropriate development, and to fuel speculative development contrary to local plans and NDPS, either where adopted or in the process of completion. The proposals do not present any compelling evidence that raising the threshold for 18 months will necessarily aid economic recovery, and little, if any evidence is presented as to the likely impact on the housing market of the probable recession in 2021, and the extent to which those already disadvantaged by the housing market may be further disadvantaged.

We do not support national thresholds in any form for any duration, and believe these are best set locally to enable a more flexible approach across the country.

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

We agree with the SWCs response that this is best achieved through grants and/or loans.

Extension of the Permission in Principle Regime

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

We do not agree. We think it is imperative for local democracy that local people are engaged and involved, usually via Parish and District Councils. Whilst we would welcome speeding up the planning process, there is a role for community consultation and engagement. In our parish experience this can result in better design, and a slightly more responsive approach by developers to reasonable community concerns. It is often larger, major developments that raise the most legitimate concerns. Preventing community engagement and consultation runs the

risk of higher levels of 'Nimbyism', and runs the risk of undermining the credibility of the planning system and eroding public confidence in it. As a Parish Council we are front and centre in hearing community views and we already know that public confidence in the planning system locally is low, with a common perception that their views and concerns are ignored, and that 'the system' is loaded towards the developer. When this is coupled with housing provision that is perceived by local people as 'out of kilter' with local need then very negative perceptions of planning ensue.

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?

No, as stated at Q24, we disagree that major proposals can be appropriately considered under Permission in Principle consent.

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

We support the response of SWCs- The capacity of the LPA to make such an assessment relating to building heights without the benefit of supporting information in relation to the impacts of the development is questioned. Without the benefit of supporting statements such as a Landscape and Visual Impact Assessment (which cannot be requested at the Permission in Principle application stage) the LPA would have no evidence upon which to base setting such parameters. The value of setting such parameters is considered to be limited in any case given that the consent sets an upper limit for dwelling numbers which can theoretically be accommodated on the site. To specify dwelling heights in addition to this would force the LPA to make a judgement on appropriate building scales for a site without the benefit of an appropriate level of detail to support such an imposition.

In addition, Neighbourhood Development Plans, and their attendant Design Codes, Landscape impact work, and significant view work need to be properly considered. Permission in principle may mean that this parish level planning policy is too easily overlooked.

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

We agree the SWCs response- and think the use is likely to be taken up for those sites which the applicant does not consider will be granted permission. In our experience these are often controversial sites within village settings, and are often contrary to those pre-identified as preferred options at LPA planning or at NDP planning. This means that PiP should be discouraged rather than promoted as a

solution, as it is likely to fuel the speculative development that undermines villagers support for the planning system, particularly where preferred options have already been consulted on and agreed.

In addition, it is possible that if extended to major applications these would only be used for complex sites with a number of planning issues which may prevent TDC consents from being granted or may be time-consuming in determination.

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?

In our view, there is a potential negative impact in the following areas:

- Elderly wishing to downsize into more appropriate housing within their locale.
- Growing families trapped in inappropriate housing due to lack of affordable housing locally.
- Public sector workers living and working in rural areas with high market prices and bias towards executive housing.