

# Consultation response form

This is the response form for the consultation on the draft revised National Planning Policy Framework. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (\*)

## Your details

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Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?\*

## Organisational response

If you are responding on behalf of an organisation, please select the option which best describes your organisation. \*

### Other (Please specify)

If you selected other, please state the type of organisation

Housing association consortium/alliance

Please provide the name of the organisation (if applicable)

Homes for the South West (H4SW)

## Chapter 1: Introduction

### Question 1

Do you have any comments on the text of Chapter 1?

[Click here to enter text.](#)

## Chapter 2: Achieving sustainable development

### Question 2

Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 3

Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 4

Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

[Click here to enter text.](#)

## Chapter 3: Plan-making

### Question 5

Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

## Question 6

Do you have any other comments on the text of chapter 3?

H4SW is supportive of the proposals to reform viability assessments for affordable housing requirements, especially measures to improve transparency and make assessments publicly available. The proposal for plans to set out the contributions expected for particular sites and types of development in advance is a positive step and should prevent developers from seeking to reduce planned affordable housing contributions at a later stage in the planning process. However, it remains unclear whether the proposed method for calculating land values, based on Existing Use Value Plus (EUV+) will be effective at bringing forward more affordable housing in practice. The success of this method will be determined by the price at which the landowner is paid. Currently the guidance means that evidence for the price will include *“comparable sites of the same site type that have recently been granted planning consent”*. This will mean the price is likely to be close to the value of land with residential planning permission. We anticipate this method will lead to less affordable housing being delivered because of the high price paid for the land. The Government could consider measures to ensure that land is released at a price high enough to encourage the landowner to sell, but low enough to ensure an increased provision of affordable housing.

H4SW welcomes the focus on setting out infrastructure requirements for particular sites and types of development. Good housing cannot be created without reliable, high-quality infrastructure. Building sustainable communities depends on the provision of transport and utilities. We know from our experience in the South West that a lack of quality infrastructure is a key barrier to the delivery of more homes. Our region is one of the most popular in the UK in which to live and do business and attracts huge numbers of visitors. Existing infrastructure is not robust and struggles to cope, especially when faced with often extreme weather conditions. Infrastructure investment is increasingly pivotal to unlocking strategic land opportunities that will ensure housing investment is accelerated.

## Chapter 4: Decision-making

## Question 7

The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 8

Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

Please select an item from this drop down menu

Please enter your comments here:

[Click here to enter text.](#)

### Question 9

What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

Please enter your comments below

We would support the use of review mechanisms to capture changes in value. However, it is important that those mechanisms are able to capture decreases in value as well as increases.

### Question 10

Do you have any comments on the text of Chapter 4?

[Click here to enter text.](#)

## Chapter 5: Delivering a wide choice of high quality homes

### Question 11

What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?

Please enter your comments here

We are pleased to see an acknowledgement that “*small sites can make an important contribution to meeting the housing requirement of an area*”. As an alliance, H4SW is ready and able to invest £2 billion in new housing. However, to deliver on this promise we must have access to the land to build on.

The current model for development is geared towards those who can acquire land as the highest bidder. We support the proposed measures to promote the development of small sites, allowing more opportunities for SME developers. We are pleased to see the recommendation that local authorities should ensure that at

least 20% of the sites identified for housing in their plans are of half a hectare or less.

### Question 12

Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

**Please select an item from this drop down menu**

Please enter your comments here

H4SW supports the principle that there should be a presumption in favour of sustainable development where delivery is below a percentage of the housing required. However, we believe that the current proposals do not go far enough and that the percentage should be raised so that the presumption in favour of sustainable development applies before under delivery at e.g. 85%.

### Question 13

Do you agree with the new policy on exception sites for entry-level homes?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 14

Do you have any other comments on the text of Chapter 5?

Delivering a sufficient supply of homes :

The government could introduce requirement on developers for a minimum percentage of affordable housing as part of the grant of planning permission, to be ring-fenced as the Community Infrastructure Levy (CIL) currently is. This would stop developers negotiating away affordable housing once a project is underway. Whilst we welcome the emphasis on viability assessment at plan level, setting out affordable housing requirements earlier in the process, we do not believe that the proposals outlined in this chapter go far enough. We recommend that in addition to setting out a percentage of homes to be available for affordable home ownership, the draft NPPF should set a wider requirement for the overall affordable housing contribution expected on a site.

The South West is one of the most desirable places to live and work but faces a challenging combination of high house prices and low average wages. With a range of cities, historic towns, coastal towns and rural communities, the South West is diverse and has significant pockets of deprivation. The average house price (in 2016) was £256,000, which is more than ten times the average regional income. In

some rural areas average house price is more than 13 times average income, and there is a high demand for affordable housing.

Unlike open market housing, which is delivered at a sale rate dependent on market conditions, affordable housing demand is measurable and build out rates are constrained only by the speed at which we can build at the right quality. Therefore, the higher the volume of affordable housing on a given site, the higher the rate of delivery. We believe that a requirement of 25% would provide more certainty around the rate of delivery.

Provision of affordable housing should not be sought for non-major developments and believes that all market housing should contribute towards the provision of affordable housing. We are pleased that the draft NPPF does not mandate the provision of Starter Homes. However, we do not support the proposal to include Starter Homes, as specified in the Housing and Planning Act, in the definition of affordable homes. Research has shown that in many areas Starter Homes will not be affordable for those on low-to middle incomes. As illustrated above, the circumstances in the South West mean that this is likely to be the case across much of the region.

Housing associations build a range of different homes and tenures and can build quickly and effectively with less consideration given to sales rates for market homes than commercial housing developers. We agree with the principle in the draft NPPF that the needs of groups with specific housing requirements are identified and that the size, type and tenure of homes required for different groups are set out, including those who require affordable housing. H4SW calls on the Government to further acknowledge the key role of housing associations in delivering a sufficient supply of homes.

Our sales rates show that we can deliver more housing across a range of different tenures than private developers. Our financial structure and overarching purpose to house those in greatest need allows us to be more flexible and to deliver affordable housing at a build rate determined by quality, not market sale conditions. Housing developers will generally plan a mix to derive the highest return whilst at the same time achieving a target sales rate, which will not be determined by demand. This can lead to delays in the planning process while the merits of design or viability are negotiated with the local planning authority.

Identifying land for homes:

Bringing forward more land for development is critical to delivering more homes. We agree with the Government's emphasis in this Chapter on ensuring that a "*sufficient amount and variety of land can come forward where it is needed*". Increasing the supply of land for development would reduce the upward pressure on land values, curtail discussions about the viability of development programmes and maintain the level of affordable housing to be delivered. We believe that local authorities should extend their land supply targets. Just as businesses over plan to achieve budget or to exceed it if possible, we believe that local authorities would be more likely to secure the land they need if they aimed for a 5-year + 30% target for every 5-year period.

## Chapter 6: Building a strong, competitive economy

### Question 15

Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 16

Do you have any other comments on the text of chapter 6?

H4SW supports the recommendation in the draft NPPF that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. In particular, we are pleased to see the requirement that planning policies should seek to address potential barriers to investment, such as inadequate infrastructure.

According to the CBI, by unlocking higher productivity, the South West could add £14.8billion to the UK economy. We also know that 63% of businesses in the South West are dissatisfied with infrastructure, compared with a national average of 46%. As outlined in our response to Q6, we believe that investment in infrastructure is the key to delivering a strong, competitive economy and would like to see the Government doing more to incentivise improvements in this area.

## Chapter 7: Ensuring the vitality of town centres

### Question 17

Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 18

Do you have any other comments on the text of Chapter 7?

[Click here to enter text.](#)

## Chapter 8: Promoting healthy and safe communities

### Question 19

Do you have any comments on the new policies in Chapter 8 that have not already been consulted on?

[Click here to enter text.](#)

### Question 20

Do you have any other comments on the text of Chapter 8?

H4SW welcomes the government's recognition of the social and economic benefits of estate regeneration.

## Chapter 9: Promoting sustainable transport

### Question 21

Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 22

Do you agree with the policy change that recognises the importance of general aviation facilities?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 23

Do you have any other comments on the text of Chapter 9?

Click here to enter text.

## Chapter 10: Supporting high quality communications

### Question 24

Do you have any comments on the text of Chapter 10?

H4SW is pleased to see an emphasis in the draft NPPF on supporting the delivery of advanced, high quality and reliable connectivity, and agree with the proposal that planning policies and decisions should support the expansion of electronic communications networks.

In the South West, as in many places across the country, improved digital connectivity would improve the regional economy, enabling more people to work from home or on the go. 94% of businesses in the UK believe that digital technologies are a crucial driver of increased productivity. Overall, it is estimated that increased broadband speeds could add £17 billion to the UK output by 2024. In the South West there is huge potential for more entrepreneurial activity, especially in rural areas, and this is reliant on good connectivity.

## Chapter 11: Making effective use of land

### Question 25

Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

**Please select an item from this drop down menu**

Please enter your comments here

Click here to enter text.

### Question 26

Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

**Please select an item from this drop down menu**

Please enter your comments here

H4SW would welcome the introduction of minimum densities as they would help meet housing need where there is a shortage of land.

### Question 27

Do you have any other comments on the text of Chapter 11?

[Click here to enter text.](#)

## Chapter 12 : Achieving well-designed places

### Question 28

Do you have any comments on the changes of policy in Chapter 12 that have not already been consulted on?

[Click here to enter text.](#)

### Question 29

Do you have any other comments on the text of Chapter 12?

Evidence shows that the most sustainable communities are grounded in developments that are designed on a “*tenure blind*” basis. While there can be a difference of emphasis in design between homes for market sale and for social rent, all tenures should benefit from good design. There may be a greater emphasis on detached houses for private sale, for example. Affordable housing tends to be built in small clusters to facilitate the management of common areas such as parking courts.

The H4SW alliance is as focused on building communities as building individual homes and will, where possible always look to provide community infrastructure earlier in the development programme on a given project.

## Chapter 13: Protecting the Green Belt

### Question 30

Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt, and to provide for the other forms of development that are ‘not inappropriate’ in the Green Belt?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 31

Do you have any other comments on the text of Chapter 13?

[Click here to enter text.](#)

## Chapter 14: Meeting the challenge of climate change, flooding and coastal change

### Question 32

Do you have any comments on the text of Chapter 14?

[Click here to enter text.](#)

### Question 33

Does paragraph 149b need any further amendment to reflect the ambitions in the Clean Growth Strategy to reduce emissions from building?

**Please select an item from this drop down menu**

[Click here to enter text.](#)

## Chapter 15: Conserving and enhancing the natural environment

### Question 34

Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 35

Do you have any other comments on the text of Chapter 15?

[Click here to enter text.](#)

## Chapter 16: Conserving and enhancing the historic environment

### Question 36

Do you have any comments on the text of Chapter 16?

[Click here to enter text.](#)

## Chapter 17: Facilitating the sustainable use of minerals

### Question 37

Do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text in this chapter?

[Click here to enter text.](#)

### Question 38

Do you think that planning policy in minerals would be better contained in a separate document?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### Question 39

Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

## Transitional arrangements and consequential changes

### Question 40

Do you agree with the proposed transitional arrangements?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### **Question 41**

Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

**Please select an item from this drop down menu**

Please enter your comments here

Click here to enter text.

### **Question 42**

Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

**Please select an item from this drop down menu**

Please enter your comments here

Click here to enter text.

## **Glossary**

### **Question 43**

Do you have any comments on the glossary?

Click here to enter text.