

HOMES FOR THE SOUTH WEST

Levelling-up and Regeneration Bill: reforms to national planning policy - Homes for the South West response

Overview

Homes for the South West (H4SW) is a group of chief executives from 11 of the largest housing associations in South West England.

We support the intention of simplifying the plan making process and making it easier for LPAs to get plans adopted. However, in making the plan making process simpler it is essential that the housing needs are still met – supported by the role of housing associations and evidence of need in the local area.

The addition, in section 5 of the draft NPPF, terms such as “meet as much housing need as possible” and “standard method is an advisory starting-point for establishing a housing requirement for the area” indicate that the new policy does not commit to meeting housing needs and offers lots of opportunities for LPAs to under provide housing if they choose to do so, which is often the easiest and most politically acceptable stance to take.

We are concerned that in combination, the changes proposed through the NPPF revisions will water down the requirement for LPAs to plan for the full housing needs of an area and make it easier to dodge the requirement.

Specifically, we are particularly concerned about the removal of:

- the test for the plan to be justified;
- the 5yr land supply test from the first 5 years of the plan;
- the suggestion that authorities with green belt won't be required to review the green belt in order to meet the housing needs.

We have responded to the relevant consultation questions on the page below.

Consultation response

Question	H4SW response
<p>1 - Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?</p>	<p>No – the changes to the plan making process are suggested to make it easier and more efficient for Local Authorities to adopt Plans.</p> <p>We recognise the importance of Council's having up to date plans and support the intention of simplifying and speeding up the process such that more LPA's will have up to date adopted plans.</p> <p>However, under the current examination process there is not sufficient interrogation of the housing land supply to ensure that at the point of adoption the Council can demonstrate a 5 year supply of land for housing; and in simplifying the process, it is likely that the level of scrutiny will be even less.</p> <p>This runs the risk of plans having significant shortfalls against the 5-year land supply requirement which would then lead to an undersupply of housing; and critically an undersupply in affordable housing.</p> <p>Ensuring that Plans have a robust housing supply from the outset is critical to ensuring housing needs are met, and we believe that the requirement to be able to demonstrate a 5 year housing land supply during the early years of the plan is critical to ensuring that sufficient homes are delivered to meet these needs.</p>

<p>2. Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?</p>	<p>No – the buffer on the housing land supply requirement ensures that there is a degree of flexibility for under delivery of sites, to ensure that housing needs are met if some sites stall or fail to deliver at the rate anticipated (which is often the case).</p>
<p>4. What should any planning guidance dealing with oversupply and undersupply say?</p>	<p>The proposed change to Para 11)b)iii) suggests that the past over-delivery of homes should be discounted from any new plan.</p> <p>Any new plan should however be based on an up to date evidence base that would in itself take into account any historic over delivery by reflecting this within the assessment of housing need undertaken at the start of the plan making process. We are concerned this suggested change will have the potential to reduce the supply of housing necessary to meet housing needs and would not reflect the level of housing need identified by the evidence base.</p>
<p>7. What are your views on the implications these changes may have on plan-making and housing supply?</p>	<p>As a group of housing associations, we are concerned that the changes proposed through the revised NPPF could have a dramatic impact on the number of homes being planned for and the delivery of housing.</p> <p>Combined, the changes have the potential to remove the requirement to plan for the appropriate level of housing need; and remove the mechanisms available to developers to plug any shortfall when it arises.</p>

	<p>These measures could have a significant detrimental impact on the level of affordable housing to be achieved and exacerbate existing issues with the affordability of housing.</p>
<p>9. Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?</p>	<p>No – Many LPAs with Green Belt also have the most significant housing need and affordability issues. Green belt is a policy rather than an indication of the value or beauty of a piece of land.</p> <p>Much Green Belt land does not perform the functions that it was designated for and without undertaking a review, it is impossible to determine whether there is Green Belt land that should be released for development – and whether the harm of not meeting the housing need outweighs the impact on the Green Belt.</p> <p>With the ability to avoid looking at the Green Belt many LPAs on the edge of urban areas will avoid allocating sufficient land for housing due to how unpopular this may be.</p>
<p>11. Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?</p>	<p>No – it is our view that all Plans should be justified.</p> <p>We are content that the plan making process should be streamlined but it must be suitably justified so as to demonstrate that it provides a good balance of meeting housing needs as well as all of the other competing interests.</p>