

Housing, Communities and Local Government Committee

Oral evidence: The Future of the Planning System in England, HC 858

Monday 9 November 2020

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Members present: Mr Clive Betts (Chair); Bob Blackman; Ian Byrne; Brendan Clarke-Smith; Ben Everitt; Rachel Hopkins; Paul Holmes; Ian Levy; Mary Robinson; Mohammad Yasin.

Questions 1 - 62

Witnesses

I: Brian Berry, Chief Executive, Federation of Master Builders; Kate Henderson, Chief Executive, National Housing Federation; Philip Barnes, Group Land and Planning Director, Barratt Developments.

II: Lisa Fairmaner, Head of London Plan and Growth Strategies, Greater London Authority; Andrew Longley, Head, North Northamptonshire Joint Planning and Delivery Unit.

Examination of witnesses

Witnesses: Brian Berry, Kate Henderson and Philip Barnes.

Chair: Welcome, everyone, to this afternoon's session of the Housing, Communities and Local Government Committee. Our evidence session this afternoon is the first in our inquiry on the future of the planning system in England.

Before we go over to our first panel of witnesses, members of the Committee are invited to put on the record any interests they may have that may be particularly relevant to this inquiry. I am a vice-president of the Local Government Association.

Rachel Hopkins: I am a sitting councillor on Luton Council and I have recently been invited to be a vice-president of the LGA.

Ian Byrne: I am still a sitting councillor in Liverpool.

Mary Robinson: I employ a councillor in my staff team.

Brendan Clarke-Smith: I am a sitting councillor in Newark and Sherwood, and I employ a councillor on my staff team.

Q1 **Chair:** We can move on to the important business of now introducing our witnesses. We have three witnesses today. I am going to ask them to say who they are and what organisation they are representing.

Kate Henderson: Hello, everyone. I am Kate Henderson. I am the chief executive of the National Housing Federation.

Philip Barnes: Good afternoon, everyone. I am Philip Barnes, the group land and planning director at Barratt Developments.

Brian Berry: Good afternoon, everyone. I am Brian Berry, chief executive of the Federation of Master Builders.

Q2 **Chair:** Welcome to all three of you. We will ask a variety of questions. If we have a question addressed to a particular member of the panel, we will indicate that when we are asking the question. Otherwise, you are all welcome to come in. If you do agree with what has been said before, if you could just say you agree, it helps, because we have a lot of questions, and we want to make sure we get through them in a timely manner. In asking the question, if Members could indicate who they would like to come in first, that would then be helpful as well.

I will ask you a fairly obvious question. There are some quite major changes being proposed to our planning system by the Government, and indeed there may be other changes you might like to see that are not being proposed. Starting with Kate Henderson: from your point of view, what are the strengths and weaknesses of current system?

Kate Henderson: Thank you very much for inviting us along. We welcome many of the ambitions of the proposals in terms of quality, transparency and speed, but we are concerned about whether these can be realised in terms of the further detail that is needed and the capacity of the system. For us, our real concern is around the proposal for a new national infrastructure levy and whether that is the right solution, particularly at a time of market instability.

In terms of the current system, the thing we are most keen to focus on as part of our evidence is around developer contributions. What we would like to see is the Government focusing on making the current system work better, for example by improving the section 106 process. Rather than reducing its scope or abolishing it, we would like to work on improving its effectiveness and deliverability.

We are making that case because we have a chronic shortage of housing in England, which the Committee has been looking at, and we have growing economic uncertainty. For us, we do not think we need wholesale reform; what we need is to improve what we have.

Chair: We will be coming to the infrastructure levy in more detail in a further question, so we can follow that one through.

Philip Barnes: Barratt supports the Government's objectives for a faster

and more certain planning system that delivers better outcomes for developers, local authorities and communities.

I will sum up our three main points in our representations on the White Paper. We support to drive to better design, and in particular the reference to popular design. We do an awful lot of work with our customers, and we feel we have a good understanding of what is popular in design terms. We are very keen to work with local authorities and the Government on engaging on the content of design codes, which are a fundamental element of the planning White Paper.

Secondly, we support the proposals for binding local authority housing targets and a 30-month timescale for preparing a local plan. With local plans taking on average seven years, we much welcome proposals to speed that up.

Our third point was on the infrastructure levy. That is an area where we think there is more work for the Government to do; the Government accept that. We are keen to engage in that process of coming up with a solution for securing developer obligations that is practical and feasible. The Barratt view is that the 2016 Local Plans Expert Group report on developer obligations, led by Liz Peace, is perhaps a good starting point for that engagement.

Brian Berry: You do not need me to tell you that we have a housing crisis in this country and that there is a need for greater diversity in the housing market. Over the last 10 years or so, there has been a marked decline in the number of SME housebuilders. We carry out an annual survey of our housebuilder members, and this year 48% in our survey said that planning was a major constraint to them actually building. Of course, that is a very serious figure when we are trying to create and build more homes in this country.

The planning proposals are broadly welcomed by the FMB. We need a faster and more efficient planning system. We particularly welcome the creation of a single infrastructure levy. The concentration and focus on standards is welcome, but there is a concern about being too prescriptive and about what is meant by "beauty". Standards should be seen within the wider context of placemaking.

The proposals on the digital transformation of the planning system are very welcome as well. That can speed up the planning process. Allowing people in planning departments to have more time to assess applications is particularly welcome, as is the proposal to speed up the local plan process to 30 months.

One of the things that worries me is resources. None of this is possible unless there are adequate resources to carry this out.

Q3 Chair: Let us try to pick up one or two of those issues. There is quite a lot that has been raised. As I say, we will come back to the levy in particular.

What none of you has mentioned is the fundamental change that has been proposed, which is that we move to this three-tier system. If you

are in an area that is earmarked for growth, the presumption is that planning permission will be given for an appropriate sort of development on that site. Does that not really shift the whole bit about engaging with the local community on to the local plan stage and away from the individual application stage? Will a lot of people feel that is very centralising and taking away their right to have a say as a local community? I am going to put that one to Philip, because presumably the housebuilders are going to be very happy if they cannot have their applications held up by local objections.

Philip Barnes: There were a lot of questions behind that last question. If I take the last one first, the planning system has always balanced central control against local control. The question for us has to be, "Are the proposals in the White Paper getting that balance right?" I know we are going to come on to the detail, but our view is that the proposals largely get that balance right. The proposals promote a much better and comprehensive democratic process to come up with a local plan that is simpler to understand; they promote housing targets for local authorities that can and should be met, which we think is important.

I do not apologise for saying that I am perhaps particularly biased this week. Last week I spent several meetings discussing a site that went through a democratic process to be allocated once. It went through a democratic process to secure outline planning permission. It went to a planning committee to consider the reserved matters and it was deferred. It went again to a planning committee to consider the reserved matters and it was deferred. It went each time with an officer recommendation for approval. It went a third time with an officer recommendation for approval and it was refused, so we are now facing a further year's delay, potentially, for that appeal.

Barratt's vote would be to get behind a much more open, transparent and digitally-driven local planning process that gives communities and local politicians the right to influence plans successfully and, from there, to continue the consultation and participation so that there is input on the design of proposals but there is not the ability to go back on that democratic decision that a site is suitable for housing development.

Q4 **Chair:** I will just pick up on that. You may have had an extreme case there, where conditions have been raised in the end and they have stopped the development. Very often, those conditions are quite important to local people when they are attached to a planning permission, are they not?

If you move to a system where a presumption in favour of development exists because they are in a growth area as part of the tiering, does that simply not shift the need to have all those issues around conditions and particulars of a site referred to the local plan stage? Could that not mean that the local plan stage takes an awful lot longer? An awful lot of work will have to be done on all these sites before the plan can be agreed. Have you thought about that?

Philip Barnes: There is definitely an issue with what we would call white land. That is land that is not a flood-risk area, greenbelt or an AONB; it is

maybe countryside on the edge of a settlement. There needs to be more thinking done to avoid a situation where the new system either imposes a blanket ban on development of any land of that sort or, equally importantly, gives the impression that there is a blanket acceptability for development of land such as that.

Behind the growth designation, Barratt recognises that there will need to be more detail and perhaps subdivisions that give communities a clear understanding of what the criteria are that would allow development in those kinds of locations to come forward. I am thinking of a case where there has not been enough housing delivered or if it is clear the site is acceptable in landscape terms.

Q5 **Chair:** Can I push you a bit more before I come on to Kate and Brian? If you say, "Okay, you want the certainty. It is in the local plan; therefore, it can be built," you are basically saying that that is a blank sheet of paper for the developer, are you not? You do not really need for the planning committee to have any powers at local level over specifying appropriate conditions on the site; it is just going to be built. Is that what you are saying? If it is not, what is the change from the current system?

Philip Barnes: What I am saying is that, when the allocation is made, for every site—to my reading, the planning White Paper is proposing this—there should be a design code that specifies matters such as scale, design, infrastructure, position of open spaces, height or massing. If the development does not come forward in accordance with those parameters in the design code, then of course the officers can and should refuse planning permission for that development.

Brian Berry: We broadly welcome the principle of zonal planning, but it has a danger of being a bit too prescriptive. Small builders often rely on windfall sites. When we are looking at the creation of these zones, we need to think about how windfall sites are dealt with. That is where the opportunities are for local housebuilders.

In terms of community engagement, our members live in the community; they are part of the community. They will want to build things that are sympathetic to the community. Local housebuilders are probably better placed, and hopefully there would be much better community engagement there.

I would also flag up some research that the FMB did a couple of years ago with the LGA. This is about communication. We would like to see more examples of developer fora across local authorities, where small builders and local authorities can come together and talk. There is poor communication in many areas. There are some shining examples in Birmingham and north-east Lincolnshire. By builders talking to the local authority, they have been able to speed up and resolve planning applications.

Q6 **Chair:** Kate, you may have a slightly different view on the need for fundamental change and the need for improvement. Would that be a fair assessment of what you are saying to us?

Kate Henderson: Yes. There is also a lot to welcome in terms of the

ambition of having a planning system that is effective, efficient, delivers great places, is sustainable and offers that certainty to local authorities, communities, residents and the private sector as well. What we have proposed here is pretty high-level. On the point we have just heard around zonal planning, the growth areas and the renewal areas, it is about how that would work in practice and the detail of what needs to come into place to make that effective and to give that certainty at a time when we have huge market uncertainty.

To change from the system we currently have over to a zonal planning system will require a huge amount of resource up front. It is always the things we just heard Philip talking about in terms of the design codes, being able to, within a designation, talk about the sustainability, the façade, the height, the character and the infrastructure need that would enable a presumption in favour of development. At this stage, we do not have that detail. Of course we are committed to engaging constructively in the process, but we do not have the detail yet. When it comes to renewal, it is even more complicated than it is for growth zones.

Q7 Chair: Finally from me, I want to come on to the important question of numbers. We all want to see more houses built; this is about how we go about it. I will take you in reverse order. Coming back to Kate, are you satisfied with the idea that there should be a prescription for each local authority about the houses that should be built in their area?

Secondly, we have seen the distribution numbers as currently proposed. Algorithms are in vogue this year for solving lots of problems, or not solving them. Is that distribution right?

Kate Henderson: There is no easy or perfect answer to this. We need to have a methodology that works, but we need a methodology that balances broader criteria. It needs to take into account both local and sub-regional expertise and judgment. There is going to need to be a backstop in the process as well.

What is difficult with what we have now is that it does not take into account the potential opportunity of levelling up. It does not take into account the differential between urban and rural. We need something that is more nuanced. It is really important that we have a methodology and that we have transparency over our methodology. We want numbers that add up to that 300,000 homes a year, which we all want to see. We all recognise that need and demand in the country, but, as it stands, it is too crude and it will miss the opportunity of levelling up.

There is some really good research from, for example, Homes for the North, which is a collection of ambitious housing associations in the north of England, whose numbers would go down as a result of this methodology, yet there is huge potential for growth and renewal. There is more work to do on it. That is probably our conclusion on this one.

Brian Berry: I agree with Kate. There is work to do here. Sorting out the methodology would need further consultation. It is also about getting the number of homes built, and that can be tricky when there are not enough small sites for small builders to be given the opportunity in the first place.

Housing markets also vary across the country. That would need to be factored in as well, as would land prices.

Philip Barnes: Yes, there is work to do. The Government Minister has made it clear that they are looking at the representation that was a month before the White Paper. We would agree with that.

Do we support them as currently proposed? No, the numbers are not right at the moment. I would agree with Kate. For example, if you have an algorithm producing numbers for the north that sets them less than they have been delivering recently and you have numbers for London that are three times higher than is being delivered and a third higher than the London Plan, you have to say that the algorithm is not perhaps producing the right result.

My final point would be that those numbers are not binding. They are a policy figure and it is for local authorities to determine what should be their number and how to meet it in discussion with their neighbours. The big change comes 18 months or two years down the line, when what we call the standard method 3 numbers come from Government to local authorities; they incorporate that layering of the policy in terms of the green belt and AONBs, and they give a number to each local authority. That will be difficult and controversial, but we very much support the principle.

Q8 **Mohammad Yasin:** Good evening, everybody. We know we are in crisis when it comes to delivering housing, and we are not building enough houses. Kate Henderson, I will start with you. In your view, what are the major factors that stop the numbers of houses we need being built? Why are we not building them?

Kate Henderson: We know there are issues with the build-out rates on large single-tenure sites that are under single ownership and control. We would really endorse the Government's independent review of the build-out rates, identifying that problem of the absorption rate for market homes and the suggestion that greater diversity on sites, including having different developers, including SME developers, and having different tenures really helps with that.

The relationship between planning and building rates is complicated, and it is probably more complicated than the number of permissions suggests. It is difficult to clearly understand, but some of the measures the Government are proposing at the moment around more transparency in the land market and understanding what land has options on it are also really positive. A big issue with build-out is having that mix of tenure on site and the mix of developers on site.

Philip Barnes: The housing crisis is deeply embedded. There is no silver bullet and no single reason. What is the greatest barrier to getting 300,000 homes built? My view is that it would definitely be the planning system. There is insufficient land with planning consent to be confident of getting 300,000 homes a year built. We are currently running at around 300,000 consents a year, down from around 400,000 in the last couple of years. The impact of Covid will have affected that.

In contrast to that, you have a study from Lichfields claiming that you need between 900,000 and 1.1 million consents a year to be certain of delivering 300,000 homes. You have research that ChamberlainWalker Economics did for Barratt saying that you need about 1.25 million consents a year to be confident of building 250,000 homes a year. You have the previous Housing Minister, Kit Malthouse, saying that we need a stock of 4 million to 5 million homes either with consent or with allocation in an adopted plan.

When I compare the mismatch between what we think is needed versus what is coming through the system, I would say it is about the planning system. More sites of different sizes in more markets will deliver more homes.

Brian Berry: I would echo the issue about planning. As I said, in our annual survey of housebuilders this year, planning came out as the number-one barrier. Linked to that is the availability of land. 64% said they had seen a decrease in the number of small sites available. That has been critical.

Local authorities are probably keener to work with larger housebuilders, and it has been the same situation with Homes England. We need a supply of small sites to encourage local housebuilders to build out. My members are typical micro-housebuilders, only building half a dozen homes a year. The information requirements can be quite onerous, both in terms of the time it takes to complete but also the costs. The costs range from £2,000 to £7,000, which may not seem like an awful lot, but you are adding an extra cost to this. Linked to that, of course, is the section 106 agreement.

It is about the land availability and the disproportionate cost it places on small housebuilders.

Q9 **Mohammad Yasin:** Brian, the Letwin review proposed building more tenures of housing together to speed up the completion of planning permissions. Has this happened yet?

Brian Berry: My members tend to operate in the private sector, more at the upper end. For them, tenure is less of an issue. In the national interest, we know and recognise the need for there to be more affordable homes. That is only right in terms of the levelling-up agenda. The number of small householders has declined now to just 12%. They are almost being marginalised into a smaller sector, which tends to be at the higher end of the housing market.

Kate Henderson: I wanted to come back and say that, for our sector, yes, we have challenges with planning and we would like it to be faster, but our biggest barrier to delivering homes is having long-term certainty over investment in social and affordable housing, which would enable us to upskill, to be more longer-term, to be more land-led and rely less on section 106s, to be able to invest in our own development teams and to form those longer-term partnerships on those larger strategic sites, so that we can deliver the affordable tenures, working in partnership with local government, private sector, investors and the construction sector,

including SMEs.

I just wanted to emphasise that it is not just planning that is the barrier to the housing numbers. In our sector, it is around long-term funding certainty as well.

Philip Barnes: I know we are not allowed to agree with the other witnesses, but Brian has talked about the small sites; Kate has talked about the larger sites. They were all really good points. There is a group of sites in the middle for volume housebuilders where we just want to get the consent and get building. If it is made a lot more complicated for us—we are not talked about section 106 and social rented here; we fully understand our responsibilities there—by having to bring in other builders, other tenures and other players, that is not going to accelerate delivery.

As Letwin highlighted, on those larger sites, which tend to be brought forward through master developers, like Urban & Civic, Grosvenor or Homes England, there is a huge opportunity to carve up those sites so there is a multitude of tenures and sites for small, medium and large housebuilders. Trying to force complication on to a small site that one of Brian's members is building on, or even a medium-sized site, risks cutting across the aspiration to accelerate volume and delivery.

Q10 **Mohammad Yasin:** Councils around the country, such as Tenterden Town Council, Ashford and Hackney Borough Councils, Rutland County Council and the Campaign for National Parks have all called for taxes or financial penalties to be imposed to penalise developers for slow build-outs. Bristol City Council suggests time limits on completing section 106 agreements. What would be the effects of these types of measures?

Philip Barnes: They would have to be very, very carefully imposed. We were ordered to shut down all of our sites on 23 March, which cost us many, many, many millions of pounds. To have a fee payable to the local authority because we were not hitting build rates would have just added salt to the wound.

In terms of mandatory build rates, you just have to be careful that they are flexible enough to accommodate changes in market circumstances so that you do not get to a situation where you are forcing a builder to build homes that either will not sell or will not sell at anywhere near what is needed to cover costs. We have done deals like that—we have done deals like that with Homes England—but it has an impact on the land value because you have to cover off the downside risk going forward.

Kate Henderson: The “use it or lose it” planning policy approach is not really the right way to ensure we deliver the right homes in the right places of the right quality and with the right affordability in the face of a deep recession. What we need to do is think about the places we want to create, make sure we do not lose that focus on quality in our desperation to build and keep construction going, and think about how we can provide the right support.

From a housing association perspective, we deliver homes of all tenure. We have many sites that are exposed to the market at the moment, and one of the things we would like to see is more flexibility over grant with the existing programme so that we can de-risk sites. For sites that have a high proportion for sale or shared ownership, we need to have the ability to have additional grant to ensure that, should the market dip, we are able to bring them forward as rented homes, hopefully social rented homes.

Those are the kinds of things we need to be looking at at this time of real economic uncertainty, to make sure we keep sites going, de-risk the process, build the homes the country needs and avoid seeing a contraction in the construction sector, which we have seen in previous recessions.

Brian Berry: It would not be such an issue for small and micro-housebuilders, because they want to build as quickly as possible and move on to the next site. They are not hanging on to any development, because that is not how their business model operates. No one likes to see extra taxes imposed on development. It would not adversely affect micro-housebuilders, but it would probably give a negative signal.

Q11 **Paul Holmes:** I wanted to focus on something that Philip said. He said there is an inefficient supply of land and that, of course, as a developer, he wants to get the consents to build out as soon as possible. If that is true—I have no doubt that it is—do you recognise the figure that there are currently 1.3 million homes that are awaiting build out post permission being awarded?

Philip Barnes: Yes. I would return to my earlier point: we probably need around about that figure to be granted every year. We need a stock of 4 million to 5 million, rather than 1 million, to give you that future confidence of hitting 300,000 a year. Of that 1 million, a very significant proportion will be on sites of over 50 units. We sell about 50 units per year on a site; it is actually less than that. If you get permission for 1,000 units, you cannot just build them all in a year and say, "There is a stock of 1 million consents. Why are we not getting 1 million houses a year?" That is not how Barratt sees it operating. I would certainly commend Nathaniel Lichfield's *Stock and Flow* report as giving a good understanding of how the type and size of consents that come in to one end of the pipeline influence the annual delivery at the other end.

Q12 **Paul Holmes:** I understand what you have said about the 4 million; I completely understand that, as a developer, you need to work within your business model. You have just acknowledged that there are 1 million to 1.3 million homes awaiting build-out. Why is it taking developers so long to live up to their obligations to build these sites out?

Philip Barnes: I cannot comment for every developer in the sector, but I can say that for every site that Barratt has, either a strategic site that we are promoting to consent and allocation or a site with planning permission, we are trying to get on site and build it as quick as we can. If

you are in Barratt, you get promoted if you get to site quickly and you get a good sales rate. You get in a lot of trouble if you are seen to be delaying, particularly after you have purchased the site.

- Q13 **Paul Holmes:** In connection to the question that my colleague Mohammad Yasin asked about section 106, in terms of putting potential limits on the planning permission granted on a development, currently that sits at five years. What impact would reducing the time limit for you to build out on currently awarded developments have on your business?

Philip Barnes: It is not something I have considered in detail. If you are talking about the period from getting consent to starting construction, and you lose the site if you are not there in five years, that does not particularly worry us; we can do that. All I would say is that 86% of the sites that get outline planning permission are not secured by housebuilders. They are secured either by a landowner or a land promoter or whatever. If we are getting a site four years after consent is granted, that is a bigger challenge for us than if we have secured an outline consent with five year to go.

- Q14 **Paul Holmes:** If it were reduced to two and a half or three years, it would not have an overriding impact on your business at Barratt?

Philip Barnes: It could have an impact on the supply of land to us from people who have secured the consent and then sold the site into the market for housebuilders. For Barratt, securing an outline consent and then getting to site within three years would not worry us unduly.

Chair: We are now moving on to the range of builders. We have just heard that most homes are built by large builders in this country, which makes us slightly different. Let us explore that issue.

- Q15 **Brendan Clarke-Smith:** Good afternoon, everybody. The Committee recently called for increases in the number of social houses. We have received evidence advocating support for building housing for older people. That links with our predecessor Committee in 2018. How can the planning system promote the creation of a diversity of different types of housing?

Kate Henderson: Local plans are really important here. It is really important that we have up-to-date local plans in place that are based on local need. This links to the consultation point as well. In engaging in these local plans, and if we move to this new system, it is so important that the voices we hear in that process are not just of current residents but also future residents of all ages who have all different types of housing needs. Having that evidence base and an up-to-date local plan in place enables you to deliver the types, tenures and mixed communities we want to see.

Philip Barnes: I should not do it, but I agree with what Kate said. I would only really add two points. If the local plan says the area needs older people's housing and it needs this tenure and that tenure, and there might need to be some regulation change on that, Barratt will do that. The issue would be about transition. If we have already bought the site

and we get a retrospective requirement to change what we can build on it, that would be difficult. We would seek a transition period.

The only final point would be this. These things are sometimes better if you go with the market rather than against it, if you can. For example, in the private rented sector there probably was not really a market appetite for a low-rise suburban rented family home five years ago, whereas the market is coming into that sector now. We are having positive negotiations and discussions with those operators. That would be a point to think about.

Brian Berry: To echo what already has been said, it is about the local plan stage and sorting out the requirements for the community. When we are thinking about building homes for everyone in our society, let us not forget about existing building stock and how we can change that. Covid has reduced the need for office space, and our towns and cities need regenerating. There are opportunities there, particularly for small builders, to convert those buildings.

Q16 **Brendan Clarke-Smith:** On that issue, how can the planning system support the growth of these small and medium-sized housebuilders?

Brian Berry: This is the big challenge. As I have said, the results from our survey suggest the planning system and the lack of land availability is a key issue. We actually need to see more smaller sites earmarked and allocated for local housebuilders. I recognise that, for a local authority strapped for cash, it is easier to use larger housebuilders. If you are looking for local housebuilders who employ apprentices, that is where future builders come from. Some 71% of all construction apprentices are trained by SMEs. We need to look at things in a slightly different way.

A speedier and more efficient planning system would help as well, because it would help to reduce costs in terms of the viability of proposals for SMEs. We need these changes; otherwise, I am quite fearful that the decline—it has dropped from 23% at the time of the financial crisis in 2008 to where we are now at 12%—will continue.

Q17 **Brendan Clarke-Smith:** Again, on that point, does the construction industry have the capacity to build the 300,000 units a year we have been looking at?

Brian Berry: I do. Half of our members get involved in some form of housebuilding, but then, because they cannot access the market, they will go back into repair, maintenance and home extensions. 15% of our members are dedicated housebuilders. We know we can increase capacity with our own membership, and I am sure that would be widespread throughout the SME building industry. There is a huge opportunity there to increase this, and indeed it is needed.

That would be beneficial in terms of standards, design, choice and regional growth, because you are actually using local housebuilders all across the country. They will not be moving around the country; they will be based in the community.

Q18 **Brendan Clarke-Smith:** Philip, as a larger builder, what is your perspective on that?

Philip Barnes: I tend to agree with Brian. From a Barratt perspective, our completions were 12,500 last year. It is published that we want to get to 20,000. We want to very significantly increase our volume. I cannot speak for other developers; that is where we sit.

I would say that skills is a potential barrier to hitting 300,000 per year. Touch wood, the rise in modern methods of construction will perhaps reduce reliance on brickies and joiners, where the key pinch-points are, and help us address that skills challenge. If there are more sites there and the planning system is really supporting the smaller builders and the builders of housing for older people, which you mentioned earlier, the market would respond. I can only really give a Barratt perspective.

Kate Henderson: I agree that we would skill up if we had the certainty of the pipeline of development. We have all recognised—the Committee certainly has—that we cannot get to that figure of 300,000 without everybody playing their part, so we need the private sector to be at full pelt going for it. We also need local authorities; we need councils; we need SMEs; we need self-build; we need community land trusts. We need all of that to be working together to get up to those numbers.

If we have certainty over the planning system and, for us as a sector, certainty over long-term funding, we absolutely could get up to those numbers, but we do not have that long-term certainty at the moment on either front.

Q19 **Brendan Clarke-Smith:** My last question on that is this. Homes for the South West suggested to this inquiry that raising the threshold that exempts small sites from having to build affordable housing to 40 or 50 units would encourage the larger developers to move into the small-site market. How would you assess this argument?

Philip Barnes: Barratt is essentially looking for sites of more than 80 or 100 units. An exemption on providing affordable units would not take us away from our core business. We are a fast asset turn business. We invest a lot in our sales machine, which means we spend a lot of money on show homes and sales centres and we want a good two or three years of sales to pay back that investment of selling quickly. Personally, I do not think this is going to drag us into sites with 30 or 40 units. It just does not quite fit with our strategy.

Brian Berry: Most of my members are building half a dozen homes a year, so it does not directly affect the vast majority of my members. This would not be detrimental.

Kate Henderson: Our biggest concern about moving the threshold for section 106s from developers of 10 homes up to 40 or 50 homes is that this would reduce the supply of much needed affordable housing. This would be particularly pronounced in rural areas, but not just in rural areas. For example, in the three years from 2016 to 2019, 70% of

affordable homes in rural locations were secured through section 106s. That is compared to 48% in urban areas. It is really specific to rural areas. That is our biggest concern: the loss of provision on those smaller sites in rural communities.

Q20 **Rachel Hopkins:** Do you support the Government's proposal to support the community infrastructure levy with a national infrastructure levy?

Kate Henderson: We really appreciate the Government's intention is to secure as much or more affordable housing through this revision to the planning system. However, as currently described, we are not sure how the proposed solution is going to enable this. At the moment, we do not support the replacement of section 106 with the proposed national infrastructure levy. That is for some specific reasons. The proposal is to calculate the levy based on gross development value. That does not take account of the widely varying viability and profitability of different areas, different sites and different schemes. It risks promoting the most profitable schemes over the most sustainable and most needed developments in communities, particularly in areas of marginal viability.

We also have some other concerns about it. It is about the link between the development and the community and how the levy might be used. The first point is about how this levy will work in areas of lower demand. How will it work in our former mining towns, ex-industrial cities and some of our coastal communities, where the land values are simply much lower?

Secondly, how will it link to the development itself? A lot of the issues with planning are around trust and accountability. I know section 106 is not perfect, but it did deliver 28,000 affordable homes last year. It also ensured that there was onsite provision of infrastructure relating to that development, which means that communities can understand what is coming with development; it makes the development more acceptable. If it goes into a pot with the local authority, it might not be ringfenced to that development.

We also do not know with the national infrastructure levy whether it would be ringfenced for affordable housing. We have such a chronic need for affordable housing. At the moment, section 106 is our onsite provision of affordable housing. That is probably my last issue around this. We need to create mixed communities. If we are coming forward with zonal planning and a national levy, we cannot go back to an era of bolt-on estates that are mono-tenure. You have a contribution that is paid and that money then goes to a piece of land on the outside of town that no one wants to live in, and that is where you put the social housing. I really think that the Government want to keep mixed communities. That is a Government ambition, but it is just really hard to see, with the current proposal, how we would do that.

At the moment, we would say that we do not support it. We are fully committed to working with the Government, if they are going to come forward with a levy, to make sure that we get those outcomes, so that

we make sure that it works for all parts of the country, delivers mixed communities and meets the ambition of as much or more affordable housing and onsite affordable housing.

Philip Barnes: We would also say it is an area where the Government acknowledge they have more work and engagement to do. We are very keen to play our part in that. Of course, we support simplicity and transparency, but we just need to keep an eye on making sure there are no adverse unintended outcomes for developers, communities or local authorities.

There are perhaps two questions for us, which are the only things that Kate has not covered. For Barratt, if we are paying a local authority to deliver some infrastructure that is necessary for our development, it makes us quite nervous about whether we are certain it is going to be delivered. Under section 106, we just deliver it ourselves. To make that real, we might get a development with a planning condition saying, "Prior to the occupation of the 200th unit, the primary school shall be completed and open for pupils", and we would make that happen via section 106. If we have paid money, we run the risk that the school is not there for placemaking purposes and also we stop a development on a site we have paid many millions of pounds to acquire, and we cannot build any more homes.

The other thing, which perhaps is repeating Kate, is that the levy is clear that it is based on typical costs. That feels like it could prejudice sites that are very infrastructure-heavy or complex brownfield sites at the expense of simple vanilla greenfield sites. Those are the two questions there for us.

Brian Berry: I would just add that, from our survey, 55% reported that sites were unviable because of section 106 and CIL. Anything that can make it clearer, more transparent and more certain, such as a single tariff, would be much more attractive than the current system. We would be more sympathetic towards a single tariff.

Q21 **Rachel Hopkins:** Should small sites be exempted from requirements to provide affordable housing and infrastructure-levy requirements?

Brian Berry: We recognise that there is a need for more affordable housing, and we would be sensible about the contributions that have to be made. For a micro-housebuilder—I am talking about those building a handful of homes—it is just not viable. We have already seen that in the figures from our survey. They will not build. They will go back into home extension, repair and maintenance.

If you want to increase capacity in the housing market, you have to exempt the small developments and allow the micro-housebuilders to flourish. It is just an extra cost. It would be disproportionate on a micro-housebuilder as compared to a medium-sized or larger-volume housebuilder.

Kate Henderson: This comes back to my earlier response around the section 106 threshold. We really need affordable housing in pretty much every postcode, every community and every part of the country. All of your constituencies need affordable housing, so where we set that threshold is really important. I have a huge amount of sympathy for the small builders. For a small builder going through the process of trying to secure a section 106, the administration and the cost of doing that is really disproportionate, so I do understand the idea of exempting smaller builders.

There are huge benefits, though, of having onsite affordable once you have through planning. If you are doing it through a section 106, there is cash flow, certainty and build-out rates. There are all of these things that diverse partnerships can enable you to do. I absolutely understand that, from the side of very small builders, a levy, CIL or section 106 is difficult.

However, if we were to exempt smaller builders at a low threshold, there still needs to be a way of getting onsite provision of affordable housing. That is why I come back to my point that I know section 106 is not perfect at the moment, but reform of the existing system is our best way of delivering that onsite affordable housing at the moment.

Philip Barnes: I do not have anything further to add. If it is a tax payable on a square meterage, I am not 100% certain why it disproportionately affects a smaller development rather than a larger development.

Kate Henderson: A cheeky addition to my response is that we should exempt any sites that are for affordable housing. Where the developer is a local authority or a housing association doing an affordable scheme, that scheme should be exempt from the levy.

Q22 **Rachel Hopkins:** That was a helpful segue. I want to test and be clear about something that I am getting it from most of you. Should the levy pay for affordable housing or should the existing section 106 approach be preserved? Does anyone want to add something to what they have already said?

Kate Henderson: At this stage, my answer is that we should keep section 106. We should make it simpler to deliver. If we are going to have a national levy, we will work with the Government on the detail of that. If we do have a national levy, it is vitally important that the levy, if it replaces section 106, contributes to the delivery of affordable housing at the same level that section 106 does. Last year's figures were that 28,000 affordable homes came through the section 106 route.

Philip Barnes: If we can get a levy that is simple, transparent and helps Brian and his members in the way he has just described, if it works and does not cut across the supply of housing, then, yes, we would like to engage in the process to achieve that. At the moment, we have not seen a lot of detail. Barratt is sitting there looking at the 2016 Local Plans

Expert Group report and saying that looks to be a good starting point for a discussion on how to secure developer obligations.

Brian Berry: We need simplicity. That would help the micro housebuilder. The results from our survey revealed that 31% said the costs of section 106 made their sites unviable. There is an issue there amongst micro-housebuilders about the costs of section 106. I would be in favour of a single tariff based on units, not value, but it has to be very simple and clear for it to work for small housebuilders.

Q23 **Rachel Hopkins:** Reflecting on the actual infrastructure levy, at what stage of development should the infrastructure levy be charged?

Philip Barnes: If we are going down the route of an infrastructure levy and if we can work with the Government and get one that works, the current proposals to charge it at point of sale would be supported by Barratt.

Kate Henderson: We need to work constructively with Government to understand the housing association role in that. One of the things we have at the moment with the section 106 is that we might come in very early in partnership with an investor and a developer to agree where the affordable housing is going to be on site, the quality and how it meets its local need. If the levy is being paid at the end once the site is built out, what do you do with the money? Is it ringfenced for affordable housing? Where is it directed in that community? Can you then get the onsite provision? We just need to work through the detail to understand how it would work in practice.

Brian Berry: It should be at the point of sale. Consistency across the country would be really important.

Q24 **Rachel Hopkins:** My final question links to what you have said as well. Do you support money being focused on the local area or should it be redistributed?

Brian Berry: Our builders live in the community, so if it goes back into the community, it would be clear and transparent. It needs to be done in a clear and transparent way.

Kate Henderson: With a national levy, it needs to be really clearly articulated, working alongside a local plan, where that investment would go. One of the big issues around make sure we have community and public consent for development is understanding the infrastructure needs and the infrastructure that will come with that development.

Philip just articulated it really well. With the current section 106, on large sites, you have a trigger point when the school needs to be built, whatever number that might be. It has to be really clearly articulated to a community, where development is happening, that it will get a school, a GP's surgery, a community centre, play spaces and green spaces. These are the things that make places really nice to live in.

If it just goes into a central pot and that pot is not ringfenced—and it is not ringfenced for be affordable as well—there is a risk that you get less public consent towards development, so there would need to be local ringfencing and some local links towards that infrastructure funding for the community that is having the development.

Philip Barnes: It just goes back to the local plan. To the Chair's point, the local plan allocation would be accompanied by a design code, which is going to specify what the infrastructure requirements are. For a site that needs a lot of infrastructure, open space, biodiversity net gain, et cetera, there may be less in the pot for the local community, particularly if some of the infrastructure is remote from the site. For another site, there might be much greater scope to deliver really high-quality social and community facilities in that local area, because the site is capable of doing it. The levy funds can enable that to happen.

Q25 **Bob Blackman:** Just moving on to issues surrounding the green belt and also zero-carbon homes, quite a lot of evidence we have received in this inquiry suggests that there should be a review of the green belt. Of course, that covers a wide range of different types of land and different areas where that land is located. If you agree that there should be a review, what should the review cover? What types of changes would you like to see?

Kate Henderson: We fundamentally support the purposes of the green belt, which is to prevent sprawl and to provide good-quality natural environment that is accessible to people. That is really important. Any review of the green belt needs to be done strategically, and that has been the challenge. At the moment, it is very difficult to do because we are doing it in an "exceptional circumstances" way; it is done on a locality-by-locality basis. We need to come up to a bigger strategic scale in order to look at that.

In reviewing the green belt, there could be a case for being able to release sites, particularly sites for affordable housing. We can designate new green belt as well, but it is really hard to do that without a strategic and bigger-scale look at it. That would probably be our starting point. The purpose of the green belt remains a really important one, around containing urban sprawl.

Bob Blackman: You are saying that a strategic review of the purposes would be reasonable.

Kate Henderson: Yes.

Brian Berry: The first question a local authority is going to have to ask is, "Do you need to review your green belt?" NPPF policy says that, if you can meet your housing needs on your brownfield sites, on your non-green-belt sites, by increasing density and by speaking to your neighbours, you probably do not need to review your green belt. Where you cannot do that, you absolutely have to review your green belt to ensure that you can meet your housing needs.

As part of that review, you look at the five purposes of green belt—they include containing urban sprawl, protecting countryside heritage towns, openness, et cetera—and you say, “If we need to find X-thousand units, which are the top 10 best sites to find those X-thousand units? Five of those are really non-starters; these five can do it”, and you allocate them. That would be my take. You start with the bits of the green belt that are not really green.

Q26 **Bob Blackman:** Could I just interject on that point? You start with that, but, as Kate quite rightly said, some of the land that is classified as green belt is not wonderful land, to put it mildly. However, it is there to stop urban sprawl. How do you stop urban sprawl if you do not have this, to use a modern parlance, circuit-breaker?

Philip Barnes: You would expect Barratt to say this, but I do not accept that all greenfield development compromises urban sprawl. The key purpose of a green belt is to preserve openness, and it also has a key role to stop the coalescence of towns. If you have a site on the urban edge that is sitting very low in the landscape, very significantly screened by trees and close to existing facilities, the development of that site does not constitute urban sprawl. What it does is creates housing in a location, generally in a green belt, reasonably close to a city, to meet housing needs.

What worries me is if we have a hands-off approach to green belt in perpetuity. You have seen what Covid is doing to people’s aspirations for their housing, the choices they want to make and the feelings about their own houses. We do not want to be forcing people to buy houses that are three hours’ commute away from where they work because we are desperately trying to protect poor-quality sites on the urban edge of the city itself.

Q27 **Bob Blackman:** There are other issues about whether people will commute as frequently as they do at the moment, in any case, or work from home. They might, therefore, need a different type of home from the ones currently being built. That is a moot point, I accept. Brian, do you want to give us your view on the green belt?

Brian Berry: The green belt is a highly emotive subject, and some of that is because of poor understanding. It is not all lush, green land. It is some scrubland that could actually be quite helpful in terms of development, particularly the sort of sites that would be ideal for small builders. The principle behind why it was set up is very laudable, and we want to protect our countryside. Maybe the land could be found elsewhere, so we offset it and we do not lose that protection that the green belt has afforded. We should remind ourselves of the principles behind why it was set up.

Q28 **Bob Blackman:** The majority of our respondents say that the protections for areas and buildings of environmental, architectural and historical importance are thought to be sufficient at the moment. Do you agree with that? Do we need any more protections?

Brian Berry: I have no evidence to suggest that the protections are not adequate. What we do need, though, is a skilled workforce to maintain those buildings.

Bob Blackman: Absolutely, yes.

Brian Berry: At the moment, that is where we are struggling. We hear so much about offsite manufacturing; I would like to hear the same amount of effort in terms of upskilling people not only to learn traditional trades but to understand the requirements of a zero-carbon economy.

Q29 **Bob Blackman:** Moving on to the plan for zero-carbon homes, when Brandon Lewis was in front of the Committee in 2015—Clive and I were the only ones on the Committee at the time; Brandon Lewis was one of our 22 or 23 Housing Ministers over the last 23 years—he said the plan for zero-carbon homes would add costs of approximately £3,500 per unit to an average semi-detached house. Time has moved on over the last five years, and the Government White Paper now proposes zero-carbon homes by 2050. How much, in your estimation, does a zero-carbon home cost? Could we achieve this more quickly than by 2050, by which time we will probably have had about 35 or 40 Housing Ministers?

Kate Henderson: I do not have the specifics on cost per home of building to zero carbon, but we certainly should be moving towards building to the zero-carbon standard for all homes. We supported the ambition of the Future Homes Standard, which is coming forward, but it needs to be more than just a fabric-first approach. What we would like to see is that any standards that come forward are a level playing field for everybody who is building. That would deliver economies of scale, it would bring down costs and it would enable us to do this faster.

A target of 2050 is too far off. We need a route map to 2050. Modern methods of construction are part of the solution to this but they are not the whole solution to this. As social housing providers, by far our biggest challenge—it is also an opportunity—is the decarbonisation of our existing housing stock. We really welcome the Conservative manifesto commitment to a Social Housing Decarbonisation Fund. It is really positive that we have a pilot of that fund. That pilot is targeted at local government, which is great. We would like, in the next phase, for it to be expanded so that housing associations can also apply to it.

We are a year away from the COP 26, the UN climate change convention. Housing has to be part of the forefront in this country of demonstrating what we can do. That manifesto commitment is great; it is about getting the next step of that there. We want zero-carbon new homes but as a level playing field. By far the biggest challenge and opportunity for us, as well as our residents and our consumers, is the existing stock: making their homes more affordable to heat and more comfortable, tackling fuel poverty and making those homes sustainable.

Philip Barnes: I am a land and planning guy, so I could not give you the exact cost, other than to say that it varies from site to site and location to location. The costs are coming down and we would hope that that would

continue. We have made the public commitment that all our homes will be zero carbon by 2030, and we have made the commitment that we will be a zero-carbon business by 2040.

Just to reiterate Kate's point about the existing stock, 96% of the homes we build are EPC rating B or above, which compares with 2% of the existing housing stock. Focusing on the existing housing stock cannot be overlooked.

Q30 **Bob Blackman:** What is stopping the ambition of getting to this position whereby all new homes are built with zero carbon well before 2050? I accept that existing stock and bringing that up to speed would be much more of a challenge, but surely we should have some sort of measure that says that all new homes should be built with zero carbon, way before 2050.

Philip Barnes: As I say, I can only speak for Barratt, and we have made the commitment that all our homes will be zero carbon by 2030. We are working to get all our standard house types zero carbon by 2025, so you are not going to get any pushback from Barratt on that.

Brian Berry: Just to echo that, we are in full support of a zero-carbon built environment. In terms of new build, it is often the SMEs that, because they have wealthier clients, are building carbon-efficient homes. That is very encouraging, but if you want more SMEs to build low-carbon homes, perhaps a range of incentives would be very helpful.

The real challenge is not with the new build; the real challenge, if we are ever going to meet zero carbon by 2050, is the existing building stock. Some 85% of our buildings will be standing and in use in 2050. We have seen piecemeal measures from the Government. What we need is a retrofit strategy to tackle this. You cannot pick it apart. All the trades need to understand how they interlink and understand the energy performance of a building. It is very serious. If Government are really committed to zero carbon, they need to think about retrofitting our existing housing stock.

Q31 **Bob Blackman:** The final issue for me is that the Institute of Civil Engineers and England's Economic Heartland have suggested that we need more regional infrastructure bodies. The Government are proposing in the White Paper to abolish the duty to co-operate. What do we now need to do to encourage local authorities to co-operate on planning issues? I will start with Kate, who might have a concern about this.

Kate Henderson: We have good examples of where we have combined authorities that are working really well. It is still a work in progress. For example, in Greater Manchester, there is the combined authority and the Greater Manchester housing partnership, which formed its own delivery vehicle. They are able to engage with Greater Manchester at a strategic tier. Similarly, we have that in London with the GLA and it is emerging in the West Midlands Combined Authority. Where we are seeing devolution and new structures involved, and there is a democratic tier there to engage with, we are really keen to do so.

What is challenging is that there has to be something that is larger than local. The duty to co-operate has not been particularly successful. What we need to do is to ensure that there is a mechanism for local authorities to work together, because we know that landscapes cross boundaries and we travel to work across boundaries. There needs to be a tier to enable strategic working together but it is not for us to be prescriptive, from our members' perspective, around what that should be. I would just say that that experience, where there is a combined authority, is working well for our members in those areas.

Philip Barnes: I am not quite as optimistic as Kate on this one. We are instinctively wary of additional layers of complexity, and slightly nervous about whether they will accelerate housing delivery or slow it down. Perhaps if the Government are going to dig into the weeds so much that they can give a local authority a policy on housing requirement, can they not specify the infrastructure requirements for that local plan as well?

Some strategic plans are working really well. Newcastle and Gateshead are fantastic. They adopted a plan and are delivering it, but sometimes it has not been so successful. In parts of the country, we are waiting five or 10 years for a strategic plan and all we are getting are plans that are prepared, get thrown out, get done again and get thrown out. That is not accelerating housing. Barratt would say, "If you can give me a single local authority where the Government have told it what housing it has to build and what infrastructure it has to deliver, we would prefer that to waiting 10 years for a strategic body to produce a strategic plan."

Brian Berry: Just to add to that, I am a bit sceptical about any additional cost. How would it work with local developers? I would want to see more of the detail and how it works; otherwise, there is a danger, again, of small developers being excluded.

Chair: Thank you to our three panel members. That has been really helpful. Thank you for the evidence you have given to the Committee. That is something that we will give thought to as we get evidence from other organisations in due course, including two more this afternoon.

Examination of witnesses

Witnesses: Lisa Fairmaner and Andrew Longley.

Q32 **Chair:** Could you begin by introducing yourselves?

Lisa Fairmaner: I am Lisa Fairmaner. I am the head of the London Plan and growth strategies at the Greater London Authority.

Andrew Longley: Good afternoon. I am Andrew Longley, head of the North Northamptonshire Joint Planning and Delivery Unit.

Chair: You are both very welcome.

Q33 **Mary Robinson:** Welcome to you both. I would like to start by looking at

the Government's proposed formula for housing targets. There has been criticism of the proposed new standard model for determining housing demand. Does there need to be a nationally determined formula?

Andrew Longley: This is the one aspect of the proposals that we see as posing the most difficulty for us in the short term, from our point of view, because it would increase our housing numbers from 1,800 to 3,000 a year, if the current proposals go through. That is really a top-down formulaic approach that does not take any account of where the jobs are going to be, where the infrastructure investment is going to take place, or where the opportunities and constraints are within our area. Although we are a very pro-growth group of authorities, this has a huge disruptive effect, because it would divert resources into fighting off five-year housing-land-supply appeals, when we really want to be collectively focusing on delivering already ambitious plans.

Lisa Fairmaner: We do not believe it is fit for purpose in a London context. There has already been a lot of discussion about the doubling-down on the affordability calculation in the model and the impact that that has, both on areas like London but also those other ambitious areas that Andrew is talking about, which would see their targets lowered. It creates a really volatile set of housing targets, and that volatility is not helpful for long-term planning. We also know that, within London, they do not have the capacity to deliver.

The Mayor has devolved powers. He has the London Plan, which is the appropriate tier of governance for apportioning the housing target.

Q34 **Mary Robinson:** It has been suggested that opposition to the formula is just a product of nimbyism. Is it that or is it councillors and their electorates knowing what their areas need best?

Andrew Longley: It is very much a case of the local authorities having painstakingly, in consultation with their communities, arrived at, in our case, what are already ambitious housing numbers and gained some acceptance around that as an appropriate strategy. They are working night and day to secure the infrastructure investment needed to deliver those plans. When, through a formula, those numbers could increase overnight by 65% in our case, it is not going to be helpful at all, in terms of housing delivery or delivering wider sustainable development needs in our part of the world.

Lisa Fairmaner: To add to that, London goes through a lengthy process to identify all of the capacity to really get significant step changes in housing delivery through its London Plans. When there is a total breakdown between the numbers that are coming through from the algorithm and the actual capacity to deliver those numbers, it breaks that trust between the communities and the local planning system, and also in terms of the local planning authorities' ability to deliver and produce meaningful local plans.

Q35 **Mary Robinson:** Lisa, if not this methodology, what alternative approach would you put forward to determine housing needs? What approach

should be used generally?

Lisa Fairmaner: In the first instance, the second calculation for affordability needs to be removed. The doubling-down against affordability is not helpful. There is scope for increases against the stock as a higher percentage. That removes some of the volatility that makes the targets jump around a lot. It also means that that development is focused on existing built areas and is not putting it out where there is no infrastructure, for example, but does so in a way that more evenly distributes the housing across the nation, focusing it particularly in London and the south-east, where there is not the capacity.

I would note that London already delivers 15% of the country's housing on just 1.2% of the land. That land is already heavily urbanised, so the opportunities are quite limited.

Andrew Longley: I would absolutely agree with the points that Lisa has made. The percentage of dwelling stock is a given. Relying on past household projections moving forward really just bakes in past performance, and the areas that have been delivering high levels of growth are expected to carry on doing so for ever and a day. That would be our starting point.

Likewise, on affordability, we are probably the most affordable place in the south-east, certainly within the Oxford-Cambridge Arc, yet affordability is still an issue for local people and, therefore, we get a load on top of our baseline numbers. In our view, that would not result in more affordable housing for the people who need it. There needs to be other investment. You were talking previously about affordable housing through section 106, et cetera. There has to be that mechanism for meeting those needs.

Q36 **Mary Robinson:** The Government have set a target of 300,000 housing units a year, and we have heard from developers in the previous session that they are keen to build these new homes. In your view, do we need to build 300,000 housing units a year to tackle the problems in our housing market?

Andrew Longley: I go with the evidence on that one. That is an ambition and it is clear that the country needs to provide significant uplift on housing that is being delivered. In north Northamptonshire, we are doing our part for that. Completions are up again year on year and we are running at about 2,000 a year in what is largely a rural area with a number of medium-sized and smaller towns. We are delivering a lot around that and I would not challenge the overall 300,000 a year.

Lisa Fairmaner: We will continue to monitor population and demographics but, at the moment, there is such a huge latent demand that we need to really provide that step change in housing, particularly across London and particularly in affordable housing. At this point, we would not be looking to reduce the 300,000 in any way.

Q37 **Mary Robinson:** I want to move on to the duty to co-operate. We have

received evidence concerned about the proposed abolition of the duty to co-operate, with some calls for strategic bodies to co-operate on aspects of planning. Should there be such institutions and, if so, what should be their remit?

Lisa Fairmaner: It is largely accepted that the duty to co-operate, as it currently is, is largely ineffective. London provides a really interesting model alongside some of the other combined authorities, where it has been incredibly effective in increasing design quality and rates of housing delivery. I would also note that there does have to be effective collaboration outside of London and with our partners outside. At the moment, the London Plan uses a system called “willing partners”, essentially calling on those authorities that want to work with us on infrastructure, capacity and growth. That has been effective to an extent but it is not a whole solution and it certainly does not have the outcomes that we see perhaps in London, where there is an overarching tier.

We do not have any solutions ourselves, other than to note that, for those areas with combined authorities, that is the right mechanism for things that are set out in the planning White Paper to be delivered. Where the planning White Paper refers to national systems such as the infrastructure levy or development management policies, they should be at the mayoral level for any combined authority.

Andrew Longley: In terms of the way that the duty to co-operate has worked in north Northamptonshire, we are four authorities and the county council working in partnership, and that has been since 2005. It has worked well for us within north Northamptonshire but, I appreciate, not well in other parts of the country. In my view, it was always a sticking plaster for the lack of any form of sub-regional guidance to shape our plans. In our part of the world, we were previously part of the Milton Keynes and south midlands growth area and we had a sub-regional strategy accompanying that, which allowed us to get on quickly and produce our own core strategy. We are now part of the Oxford-Cambridge Arc and we are seeing emerging proposals for a spatial framework for the arc, so we are very supportive of that.

Clearly, we want to be heavily involved in that and make sure that the scope of that document is right for the area. Local politicians do not want to be proscribed in detail on all matters but there will be some key things around infrastructure and around the locations of key-growth new settlements, et cetera, where it has to be done at a sub-regional level. It will not come up from the local level.

Q38 **Paul Holmes:** Good evening, both. I just want to ask some questions about local engagement and neighbourhood plans. Do you agree with the claim made in the Government’s White Paper that the planning application process allows “a small minority of voices, some from the local area and often some not, to shape outcomes”?

Andrew Longley: It is certainly true that some people are better equipped to get involved in the formal development management

process, and are more articulate and more engaged with the channels for doing that. That is a fair comment and it has always been a challenge for planners to make sure that opportunities are there for everybody affected to get involved.

Lisa Fairmaner: There is that opportunity but I would add that a lot of local authorities are going to considerable lengths at the moment in their engagement to reach out to people who would not normally participate. Sometimes, if they participate at the local plan level, it can lead to greater participation at planning application level and people feel more comfortable with the process and feel they understand it better.

Q39 **Paul Holmes:** One thing that I am quite passionate about is that the White Paper does not mention local councillors at all. What should be the role under the proposals for elected representatives?

Lisa Fairmaner: That is for the local authority and their scheme of delegation. Local councillors hold their powers and delegate them to their officers on given criteria, and that should absolutely remain. Certainly, the suggestion within the planning White Paper that there should be certain types of application, which, as a rule, elected members are not involved in is not something we would endorse.

Andrew Longley: I agree with that. That has been one of the fundamental concerns that our members have expressed about this: about them being side-lined from what they see as a democratic process. It is fair to say that there will be some applications that could be dealt with in a more streamlined way, according to rules established at the start, providing that members are fully in control of that process of establishing those rules.

Clearly, if proposals come forward in accordance with design codes or whatever, I can see the case for a streamlined approach. Where members will need to get involved again is where developers want to change what they are doing down the line. In some of our developments—5,000-home, garden-community urban extensions—you can never establish all of the detail at the front end; they will change during the life, so there will have to be a continuing process of engaging members and local communities in reconsidering and reconfiguring schemes as they are developed.

Q40 **Paul Holmes:** Lisa mentioned the scheme of delegation. When I was a chair of planning in a council, each ward councillor had the right to call in a development within their own ward. Is that a measure that should be able to stay *carte blanche* across local authorities, or do you still maintain that that should be part of an individual local authority's responsibility in a scheme of delegation?

Lisa Fairmaner: If that is how they want to operate, that should absolutely remain. It is also important that, for those people who feel less confident with the planning system, it is often how they can express their views, because they do not feel confident turning up to a planning

committee, for example. That is an absolutely critical role for a broader range of voices to be heard at a local level.

Andrew Longley: I would agree with that.

Q41 **Paul Holmes:** I just want to ask about local plans. I am going to ask this in two parts, so bear with me. What can you tell us about the number of people contributing to local plans and responding to individual planning applications? Within that, is the Government's proposed 30-month time period for completing local plans realistic? Should all local authorities be obliged to have local plans?

Andrew Longley: I will work back while I remember the question. It is very important that local authorities have local plans. I would obviously say that as a policy planner but it is clearly essential in expressing the aspiration of the area and making sure that national policy does not just override everything else.

In terms of public engagement in the planning process, you will not be surprised to hear that there is much less engagement in the plan-making. It is a huge challenge. When we have run more informal events, such as community workshops and working with schools, et cetera, you do engage a lot of people but the carry-through from that informal engagement into the, frankly, rather boring statutory process of plan-making is that you lose people along the way.

Typically, on our plans, you will get in the low hundreds of people involved in the plan-making process who make formal representations, whereas, when it comes to the planning application, you can easily have thousands of representations on a controversial application. That is notwithstanding that those same sites—I have some in mind—were part of the local plans that have been subject to a process, but people really only engage when there is the immediacy of a planning application. Sorry, I missed your middle question.

Q42 **Paul Holmes:** That is fine. Thank you for that. It sounds very familiar to me and my local authority, which has not had a local plan for 10 years. That brings me on to the final question in this section. Do you believe that the Government's proposed 30-month time period for completing local plans is realistic? I am not asking you to give me a figure or pluck one out of the air, but tell me your thoughts on the 30-month time period as proposed.

Andrew Longley: It remains to be seen around the detail of that and the scope of what is envisaged for local plans, but I do not believe it is compatible with the ambition to frontload most of the consultation and a lot of the technical work in order to give sites permission in principle. There is a huge frontloading involved here and I cannot foresee that being achieved in 30 months. We will certainly try to rise to the challenge. Previously, where the Government have given incentives through a planning-delivery grant or other sources of funding for authorities that are really trying to push it and get to certain targets, that is always useful, but I would be extremely worried if there were any sort

of sanction involved in not meeting an imposed timescale. As you know, things come up along the way, such as difficult political decisions, and plans sometimes have to be put on hold.

Q43 Paul Holmes: Lisa, you are looking at this from a London perspective in your current role, but could you let me know your views on those questions, particularly around the 30-month time period and the general number of people who contribute to local plans and individual planning applications?

Lisa Fairmaner: On local plans, it can sometimes be really hard to engage. I have seen instances where using things like fast surveys has got rates to a fairly decent level. I am not saying that every single person in a community is going to be engaged, but certainly above the hundreds that you might have seen previously. Moving to digital and using social media has been really effective in getting wider participation, even at plan-making stage.

I would also note that, on neighbourhood planning, within London we have opportunity area planning frameworks, which are very local planning frameworks, and you do get better rates of participation when you start to really drill into people's neighbourhoods and they become really familiar with them.

On the 30 months, we do not believe that that is anywhere close to being adequate. One of the reasons for that is that good engagement is an iterative process and it takes time. In the first instance, it takes capacity-building within your community. The second thing is that, if you want to go out to your community, you need to have evidence. You need to have some ideas on the table. You need to have some really strong materials to go out and engage with your communities. It takes time to prepare even that very first approach to your community. You cannot just roll it out and say, "Here you go. Here is a blank sheet of paper". We are particularly concerned about twin-tracking master plans and design codes, and what that would mean in terms of the ability of local authorities to carry out that work.

Importantly, we would have a healthy scepticism about even the Government's ability to engage with that process. There are organisations such as the Environment Agency, Natural England and Historic England that would also need to work to that 30-month timetable across the entire nation, and it would be concerning if there were penalties applied to a local authority because of those kinds of delays. Maybe they are going through a process where they are trying to agree some wording between them and it does just take time going back and forward.

Similarly, if we look at the London Plan itself, it was submitted to the Secretary of State for examination some 27 months ago, so we are quite sceptical of the ability for the processes to deliver on a 30-month timescale and we certainly would not want to see any comeback to local authorities for failing to meet the timescales.

Q44 **Paul Holmes:** I am well aware that we are starting to run behind time now, so I am going to ask two more quick questions. Could we keep the answers brief, although I appreciate your candour in that one? My next question is for both of you. Do you agree with the Government's proposal to introduce growth, renewal and protected areas? I know that that is an open-ended question, but if you could please give some brief answers.

Andrew Longley: No. It is terribly oversimplified and we have set that out in a bit more detail in our response.

Lisa Fairmaner: We agree. It does not take the best elements of zoning systems elsewhere. It is a hybrid that does not really work.

Q45 **Paul Holmes:** My final question is to Lisa. We had the Neighbourhood Planners London in and it told us that, "The culture within London boroughs and the GLA and mayoral development corporations has been antipathetic at best to the evolution of neighbourhood planning". It also said, "There are too many cases of active hostility and the London Mayor has also repeatedly failed to offer support for neighbourhood planning or design into his programmes for the capital", and that, consequently, it takes "on average 49 months to progress from designation to a made plan in London, and there are nine boroughs ... with no designated [neighbourhood] forums". How do you respond to these criticisms?

Lisa Fairmaner: I can put a slightly different hat on as a person who has led one of the plans that has been made in London: the Ham and Petersham Neighbourhood Plan. There is some hostility. It is mixed. It is not universal. I would say that it is possible and it is just a lot of hard work. There is scope, if neighbourhood planning is going to continue, for some very clear guidelines, both to the boroughs and the Mayor, but I am not convinced that the concerns are with the Mayor. There is a mixed response from the boroughs. Some have embraced it and some have not.

Q46 **Bob Blackman:** Turning to infrastructure funding and commercial property, should there be a national infrastructure levy, as set out in the White Paper? If so, when in the development process should it be paid?

Lisa Fairmaner: No, we do not agree with the national infrastructure levy. There are some significant concerns about it. One of them is when it is paid at the end of the process. We can see huge issues with that. The infrastructure needs to be delivered upfront. The local authorities can take that financial risk on. In London, we are talking about some really big-kit infrastructure, which is really the difference between a certain level of housing and a very significantly different level of housing. If you are talking about Crossrail and those kinds of investments, that infrastructure has to be upfront. We have significant concerns, including affordable housing within any infrastructure levy. Depending on the development values, the infrastructure levy may well have to be set at over 10 times what it currently is in order to be able to provide an amount of affordable housing and infrastructure equivalent to what is currently being delivered across London, so we have reservations about that.

It should not be set at a national level; it should be set at a London-wide level, which enables it to be flexible enough to take account of local development values and what is achievable. If we do not do that, our modelling shows that there is no way that you would be able to deliver the same levels of affordable housing or infrastructure with the model proposed.

Q47 **Bob Blackman:** I accept that you do not agree with the proposed development levy, but can I ask you one further question, Lisa, in relation to it? If such a levy is implemented, should it be spent in the area where the levy is made? In other words, should it be spent in the area where the development takes place rather than collected nationally and then split up all over the country?

Lisa Fairmaner: It would need to be but not at a really granular level. If you look at something like the mayoral community infrastructure levy, which is collected to pay for Crossrail, there could not be any jeopardising of the long-term funding that is already in place through the mayoral CIL, so that would need to continue. We do not agree with it being spread across the country and it does need to be local, but there need to remain different pots that are spent at different levels and there needs to be some clarity about that.

Q48 **Bob Blackman:** Andrew, what is your view on the potential infrastructure levy?

Andrew Longley: In principle, if it does everything that the White Paper promises it will do, we are quite supportive of it. That is in part because of the greater certainty that it will give to those contributions being secured. Our members are rather fed up of agreeing section 106 agreements and then having to look at them again a year or so down the line, when the developer comes back with a viability case. The certainty is great but, at the moment, I would agree with Lisa that there is no surety from the work that has been presented that it would deliver at least the same amount of affordable housing or at least the same amount of developer contributions. That is worrying for an area such as north Northamptonshire, where viability is challenged on many of our large schemes, so we would expect the Government to still be committed to contributing towards the key infrastructure that we need for many of our sites to get away.

Q49 **Bob Blackman:** Lisa covered this but I will just put this to you directly: should affordable housing be funded out of the levy, or should it be funded in a different way?

Andrew Longley: Ideally, it would be funded in a different way and make the infrastructure levy all about the infrastructure needs, but clearly the system has become rather dependent on planning to deliver affordable housing, as you heard in the previous session.

Q50 **Bob Blackman:** If it is a national levy, should the money raised from that national levy be concentrated and used in the area in which it is levied rather than spread out all over the country?

Andrew Longley: If it is, in effect, a development tax, that gives the Government scope to apportion that.

Q51 **Bob Blackman:** I accept that the Government have scope but I am after your view about whether it should be spent in the particular area where it is levied, rather than spread out on a redistribution basis.

Andrew Longley: My view is that money collected for the infrastructure needs within north Northamptonshire ought to be spent within north Northamptonshire, but the other point is that that will not be sufficient to meet the strategic infrastructure needs of the area and, therefore, we need money from somewhere else. Whether that comes from the top-slicing of a levy in areas that can afford to pay more is a matter for Government.

Q52 **Bob Blackman:** The final point that I just want to get your reaction on is that the British Property Federation noted that commercial property was not mentioned in the White Paper at all. What should the planning system do about commercial property?

Andrew Longley: It is a very difficult one because it is very much market-driven. We have experience of allocating a larger number of sites—in fact, an oversupply of sites—and the sort of uses that we allocate them for do not always come forward. The big market in our area is logistics. We cannot get enough land for the big sheds but we are much more challenged to get the higher-order employment uses. That is one of the reasons why we are so enthusiastic about being part of the Oxford-Cambridge Arc, to try to benefit from that. We will continue to identify the high-quality sites to attract those uses but, unfortunately, they do not always come. Covid and changes in the office market have put another question mark over that.

Lisa Fairmaner: We would be really concerned as custodians of London's Central Activities Zone. It is the heartland of London, including the West End and the City of London. We need to be really clever about how we manage those places. It has been really obvious to us that the town centres and places that are best managed are those that have umbrella organisations. Business improvement districts or other town-centre-management arrangements are most effective. Particularly where you have big landowners like Grosvenor or the Crown, these are really strong places. How we protect our town centres going forward is going to be absolutely critical.

The idea that, if you see vacancies, for example, there is an opportunity to lose those active uses is not one that we endorse. We look for a far cleverer management of town centres, bringing residential in and making them vibrant places, but ultimately they have to be the heart of communities. Post pandemic, what they can do there is going to be even more important. We would be concerned about any move to a laissez-faire approach. If you look at places like Soho, which looks quite a higgledy-piggledy arrangement of commercial uses, it is really carefully curated, and we want to continue that.

Q53 **Rachel Hopkins:** I have quite a short question; hopefully, there will be some short answers. A great deal of our written evidence argued that local planning authorities needed additional resources, in terms of both funding and skills. However, there are also demands across many other areas of local government and public services. Why should money be focused on local planning authorities?

Andrew Longley: The Government are asking local planning authorities to step up and to achieve a transformation in the planning system. That transformation has to have the resources and the support to enable it to happen. Things like design skills are really going to come to the fore, and there are not many authorities across the country that are geared up for that, so that is going to be one area. We certainly support the commitment in the White Paper for the skills and resource strategy to help us deliver what is being sought.

Lisa Fairmaner: I would agree. The industry itself really needs proper resource-planning services, so that they can get their planning applications through. It does not do anybody any favours to have things just sitting there because there just are not the people or there is not the funding for the skills. I am sure that your speakers in the previous session welcome being able to go to a local authority, work with them to agree what is needed on a site, and have that clarity through properly resourced planning functions, and then everybody can move forward.

Q54 **Rachel Hopkins:** Do you have any more specific areas where additional resources could be focused, maybe on the specialist skills that you mentioned?

Lisa Fairmaner: Yes, absolutely. We have just done a place-making review in terms of things around design and wider place-shaping, as well as just the nuts and bolts of providing planning services. We notice, for example, that resources tend to be directed to fee-paying. In fact, if you are going to move more to frontloading at the plan-making stage, you are going to need far better inputs, in terms of both your data at that plan-making stage and your policy-writers.

Andrew Longley: I would agree. In terms of the burden on the plan-making stage, we should be looking for the developers—the people putting forward sites—to step up and contribute towards that. I would also pick up the point about the stakeholders, such as the environmental stakeholders and Government agencies that are really stretched. We need to make sure that they are equipped to meet the challenge, particularly at the plan-making stage.

Q55 **Ian Byrne:** Lisa, do you support the Government's proposals for national and local design codes?

Lisa Fairmaner: Yes. The London Plan looks to design codes and master-planning—they are really effective tools—but what we do not support is for them to be mandatory in terms of having a blanket application right across local authorities. They are great tools but they do not have the resources to do them for every single bit of land.

Andrew Longley: Similarly, we are very supportive of stronger national guidance, which we are seeing coming through the system, and we are looking to interpret that at a local level. Neighbourhood plans will have a role to play there. We are also rolling out Building for a Healthy Life, which is a really useful tool to ensure that the basics of good design are applied across sites.

Q56 **Ian Byrne:** Local authorities that have submitted evidence to us have voiced concerns about the reduction of the democratic voice in the planning process. With that in mind, what is your view of the Government's wish to promote locally popular design codes that reflect local character and preferences about the form and appearance of development?

Lisa Fairmaner: One of our concerns is that, if you took a Victorian suburb, for example, and if you were to look at a local vernacular that just repeated the kind of buildings that you already have there, it would completely fail to provide the housing numbers that London needs to deliver. We need to provide an uplift on the existing suburban forms that we have, and the way to do that is not going to be through rigid design codes that might just set out more of the same. That is really critical.

Also, that approach to things can lead to a tick-box approach for traditional design features—yes, it has a peaked roof or whatever—but it does not make it good place-shaping, and it does not even make it good architecture. London has some amazing contemporary architecture and you would not want to see a loss of that. That kind of design journey might take a while but it is better. London achieves very high in Place Alliance's design audit—the highest out of any of the regions—and that is by applying good design principles, not rigid design criteria, which are a different thing altogether.

Ian Byrne: That is a good answer.

Andrew Longley: I agree with that if it was a good answer. The key thing is that we should not get hung up on aesthetics. Well-designed places are about more than just what an individual looks like. That is why we are really keen on Building for a Healthy Life, which deals with connections, distinctive places and Streets for All—the whole remit.

Q57 **Ian Byrne:** Should there be a national design body?

Andrew Longley: I thought we had national design bodies, and we have done a lot of work with CABE in their past incarnations, but we are certainly supportive of greater design resource and greater guidance and support for local authorities and the industry, which are trying to achieve good design.

Lisa Fairmaner: We would not say no to those kinds of things but the Mayor has the mayoral design advocates, who are a body of well-respected architects and people within that space, to advise. The use of design review panels is critical as well, and probably more important at a local level.

Q58 **Chair:** One of the proposals in the White Paper that perhaps could change planning significantly is the recognition that planning has perhaps not been as quick as some other services to embrace new technology and digital technology. Are you supportive of the proposals that are in the White Paper in that regard?

Lisa Fairmaner: We are absolutely supportive; we just do not think we need to change the entire planning system to deliver it.

Andrew Longley: We are really supportive. From what Lisa said earlier, we are some way behind where London is in terms of utilising those tools. It is something that we need the support and the resources to mainstream in our services.

Q59 **Chair:** Would you then do away with things like notices on lampposts? Are they for the last century rather than the current century?

Andrew Longley: We need them both because there will be people in the community who do not have access and who prefer to read a notice on the lamppost while they are walking their dog. We do need to get to people whichever way we can.

Lisa Fairmaner: We would agree. There are a range of channels that are needed right across the board, and not everybody has access to the internet. I know that things have changed a lot with Covid, but there are still people out there who, for example, rely on their local libraries to access the internet, and that is problematic.

Q60 **Chair:** One of the things that causes quite a lot of concern to local newspaper editors is the concern that they might lose the requirement on local authorities to have to put notices in their papers. I am not saying that newspapers have gone past their sell-by date, but has the idea of putting public notices in gone past its sell-by date, in terms of whether people read them and the value for money? Who is brave enough to upset their local editors?

Andrew Longley: I will pass on that one because I do not get involved in the advertisement of planning applications.

Lisa Fairmaner: Probably not that many people read them but there are broader things out there about what you are required to do, such as with weddings. Perhaps a national review across the board might be more relevant.

Q61 **Chair:** We will no doubt ask some politicians later on whether they want to put their head on the block in that regard. Essentially, how do you see digital technology coming in to play? Is it just on the individual applications? Is it on the issue of local plans? How would you see, in 10 years' time, planning looking different to the general public who might want to know what is happening in their area?

Lisa Fairmaner: I do not mind going first, because the Mayor has been incredibly active in this space because of its importance across London. There is the engagement part, where you can use different platforms,

and there is social media; more importantly, there is the provision of open data, and data that reads across between different things.

In terms of the areas that we are currently looking at, all of the planning data is available for London in a public format, so that any member of the public can access any of the layers that are in their local plan, for example, on a single website. We have Transport for London's public transport accessibility. You can look up any site in London and immediately know what its accessibility is. Infrastructure-mapping has also been taken on by the Mayor to reduce costs and streamline that process.

In the 3D space, we are looking at all of the different 3D models that are available, making sure that there are arrangements so that it does not really matter which borough you are working in and that there is read-across between them.

We are looking at doing our first live strategic housing land availability assessment, which, instead of doing it on a rolling programme, will be purely live. That builds on the data that has been in place for over a decade, where the Mayor collects all the data from every planning application across London through an arrangement with all of the boroughs. It is really critical that the public can access the raw planning data, as can app designers, for example. We have an open and transparent approach, both through TfL and the GLA, so that people can go and write their own apps and use that data more widely.

Looking at back-office aspects, we work with the boroughs. For example, "Submit my planning application" is something that Hackney is doing, and that looks at reducing invalid planning applications. There is a whole host of technologies that are already in play and already being piloted that we are looking at. There is a huge opportunity, both for the data and for the engagement.

Andrew Longley: That is where we would like to be in the future. Our authorities are coming together to form a unitary authority in April of next year, and that is a huge opportunity to refresh what we currently do digitally as well as to look at transformation of services going forward. We will be looking to the Government's Catapults and others to help us on that journey.

Q62 **Ian Levy:** I have a couple of questions. I would like to finish off talking about the green belt. The evidence we have received about the green belt has been varied. It has called for its extension; it has also called for the abolition of the green belt. What do you see as the future of the green belt, and also the purpose of the green belt?

Lisa Fairmaner: It makes up 22% of London's land area. We are perfectly happy with the purposes of the green belt as set out in the NPPF. We absolutely support those. We support the ongoing protections of the green belt but we also note that, if you have a look in London, there are multiple specific beneficial functions. The green belt reduces the

urban-heat-island effect that London has. It is important for food-growing and providing space for recreation. There are a whole host of environmental services that it serves, which are critical to tackling the climate emergency and the biodiversity crisis that are currently in play. It makes a contribution to green open space, which, in the post-pandemic world, as I alluded to earlier, is critical. There is then the role of containing further expansion of the built environment.

On top of that, it has driven the reuse of brownfield sites and the intensification of London's suburbs and existing urban areas in a way that, if the green belt's protections were in any way relaxed, that benefit would be reduced as well. We do not have any reason to encroach on the green belt. We will look again at what options are available for continuing to increase housing delivery within London. We note, for example, that, going through the examination in public on the London Plan, we put in an approach to small sites. The inspectors found that it was not the wrong approach but it went too far, too soon. Clearly, there is capacity there of about 10,000 homes per year by which the inspectorate reduced London's cumulative target, but we can look again at how we can ramp up delivery on small sites involving SMEs.

I wanted to note as well that, for London, we have metropolitan open land, which enjoys the same protections as the green belt, and we would want that to continue as well.

Andrew Longley: I do not have anything to add to that, because we are not affected by green belt in Northamptonshire, although I previously worked in a greenbelt authority. It clearly has a really important function going forward but, as you heard in your previous session, it will be for individual authorities to look at whether they need to undertake a review of the detailed boundaries in the light of housing requirements and other development requirements going forward.

Chair: Thank you to both our witnesses for their contributions. That has been really helpful and helps build the range of evidence that we have on what we all agree is a really important subject. Thank you both very much for coming and spending your time with us this afternoon.