

## Written evidence submitted by South Worcestershire Councils [FPS 015]

### 1. Is the current planning system working as it should do? What changes might need to be made? Are the Government's proposals the right approach?

The purpose of the planning system is to support sustainable development and for that to be plan-led. It could be argued that the planning system is not working as local plan coverage across the country is less than 50%.

The Government's proposals for planning reform appear to be centred on achieving the delivery of 300,000 dwellings per annum, made evident in the changes to the standard method for calculating housing requirement formula which forms part of the Changes to the Current Planning System consultation, which have been proposed primarily to achieve such a target with apparent little thought on the sustainable development principles of the planning system. The Government considers that the planning system is broken as the delivery of 300,000 dwellings per annum has not been achieved and this is unlikely to be achieved by the mid-2020's under the current planning system. If the Government's view is that the purpose of the planning system is to deliver 300,000 dwellings per annum, then it must be concluded that it is not working as it should do.

The South Worcestershire Councils have, since the lead up to the adoption of the South Worcestershire Development Plan (SWDP) in February 2016, delivered well in excess of the SWDP annual requirement and at a higher rate than ever previous seen across the area:

Monitoring Year	Annual Housing Requirement	Completions
2015/16	1,314	1,897
2016/17	1,314	1,693
2017/18	1,314	1,913
2018/19	1,314	2,191
2019/20	1,314	1,555

The current Standard Method calculation gives a total annual housing requirement for South Worcestershire of 1,253 dwellings, a slight increase in the SWDP average annual housing requirement of 1,183 dwellings:

	Baseline Need	Affordability Adjustment	Total Annual Dwelling Need
Malvern Hills	278	126	404
Worcester	301	54	355
Wychavon	366	128	494
<b>SWDP TOTAL</b>	<b>945</b>	<b>308</b>	<b>1,253</b>

Should the proposed changes to the Standard Method calculation set out in the Changes to the Current Planning System consultation be implemented, South Worcestershire would have a total annual housing requirement of 2,582 dwellings:

	Baseline Need	Affordability Adjustment	Total Annual Dwelling Need
Malvern Hills	380	537	917
Worcester	230	60	290
Wychavon	799	576	1375
<b>SWDP TOTAL</b>	<b>1409</b>	<b>1173</b>	<b>2582</b>

It is contended that the 300,000 dwellings per annum target is somewhat of an arbitrary one, and it should not be the driver of reforms to the planning system, which is inherently at odds with the achievement of sustainable development.

In addition, it should be noted that a contributory factor to the shortfall in delivery of 300,000 dwellings per annum is the volume on unimplemented planning permissions which are controlled by housebuilders who will not deliver unless confident they can be sold.

## **2. In seeking to build 300,000 homes a year, is the greatest obstacle the planning system or the subsequent build-out of properties with permission?**

Under the current planning system, it is suggested that a combination of both the planning system and the subsequent build-out of properties with permission are both substantive obstacles to the delivery of 300,000 dwellings per annum. It is interesting to note that it has been suggested in the development industry that there is little prospect of delivery of the quantum of housing required by the provisional revised housing requirement.

The Planning for the Future White Paper and the Changes to the Current Planning System consultation documents seek to remove the planning system obstacles to achieving this target by introducing an updated standard method for calculating housing requirement which has an annual national output of more than 300,000 dwellings, and making such a calculation binding on Local Planning Authorities. Having said that, the Planning for the Future White Paper does suggest that adjustments will be made to the calculation outputs based on land constraints, which might see the overall national output fall below 300,000 dwellings per annum. In addition, the standard method calculation output is a housing requirement rather than a housing need, and as such whether the arbitrary figure of 300,000 dwellings per annum is required to address housing need is questionable. This may lead to the planning system allocating enough land for the delivery of 300,000 dwellings per annum, but the development industry not delivering 300,000 dwellings per annum due to the uncertainty over demand.

It is clear that subsequent build-out of dwellings with planning permission is an issue across England, and whilst the Planning for the Future White Paper includes a proposal that sites for substantial development should include a variety of development types by different builders which allow more phases to come forward together i.e. enhances the rate of delivery but does not necessarily more will be built overall. More needs to be done to ensure development sites with planning permission commence on site without delay.

Measures such as reducing the amount of time a planning permission is extant unless development is commenced have helped to address this issue to an extent, but this has led to some planning permissions being commenced with the construction of a road or some footings of a dwelling and then being delayed until the developer is willing to commence building the new homes. Measures therefore need to be stronger, and it is suggested that these must be financial penalties for either delaying commencement of a development or for commencing a development to keep the planning permission extant and then delaying full commencement on site, except in exceptional circumstances such as the developer going into administration.

## **3. How can the planning system ensure that buildings are beautiful and fit for purpose?**

The planning system has a key role in ensuring that buildings are beautiful and fit for purpose, with the Planning for the Future White Paper placing even greater emphasis on good quality design, which is welcomed. Design codes, design guides and masterplans have been useful tools in the planning system, however they have not been afforded appropriate weight to ensure they influence design in the areas in which they apply to. As such, greater weight being afforded to design codes, design guides and masterplans in the reformed planning system is supported. If sustainable development is the ultimate objective, which it must be, then design must not focus on aesthetics rather on how new development will function and how to minimise impact on Climate Change and the adaptability of the development to ongoing Climate Change.

#### **4. What approach should be used to determine the housing need and requirement of a local authority?**

The merits of a standard method approach are noted, however to make such a calculation binding on a Local Planning Authority is unreasonable. The standard method formula, particularly that consulted on as part of the Changes to the Current Planning System consultation, takes no account of local circumstances and nuances, and as such may produce outputs for Local Planning Authorities which are not deliverable. In addition, the standard method formula calculates a housing requirement which is based more on housing demand rather than housing need. Consequently, it will not equate to the delivery of housing that is needed the most in the most appropriate locations.

Before the introduction of the standard method, Local Planning Authorities were required to use local evidence (usually through a Strategic Housing Market Assessment) to calculate housing need and to use that to set a housing requirement for the Local Plan. Whilst this took time to calculate, this approach would mean that an appropriate level of a range of housing is planned for in the local area which needs it. It is therefore suggested that the planning system reverts to such an approach, with suggestion that an unbinding formula is used which takes account of local need.

It may be that this approach would not lead to the delivery of 300,000 dwellings per annum across England, but this is an arbitrary figure in any case, and it would mean the delivery of a range of housing at a level which addresses the housing needs in each local area.

#### **5. What is the best approach to ensure public engagement in the planning system? What role should modern technology and data play in this?**

It is clear that public engagement with the planning system, and notably in Neighbourhood Planning, is often by those who are older, more affluent and with a vested interest in the area. A greater role for digital technology in the planning system, including through the use of social media, is therefore supported as it is likely to better engage a younger and less affluent audience. Any proposals, though, should not solely rely on digital technology as this may exclude those with limited digital technology skills.

The Planning for the White Paper proposes to refocus public engagement into the planning system to the Local Plan process, however it is often small-scale development proposals and the detail of large-scale development proposals which are the most controversial and as such require public engagement to assist in achieving the best outcomes. Therefore, whilst public engagement in the Local Plan process is crucial, public engagement in planning applications is still necessary and supported; without the latter, the planning system will not have true public representation.

#### **6. How can the planning system ensure adequate and reasonable protection for areas and buildings of environmental, historical, and architectural importance?**

The current planning system, through the National Planning Policy Framework and associated National Planning Practice Guidance, typically affords an appropriate level of protection to the historic environment.

The National Planning Policy Framework is clear that substantial harm to a designated heritage asset through a development proposal is not acceptable unless there are exceptional circumstances, and that less than substantial harm to a designated heritage assets should be weighed against the public benefits of the development proposal, including in securing its optimum viable use. Whilst the National Planning Policy Framework isn't as strong in terms of non-designated heritage assets, it is still clear that the affect of a development proposal on non-designated heritage assets still needs to be considered and a balancing judgement required having regard to the scale of any harm or loss and its significance.

There is concern, however, that there are proposals in the Planning for the Future White Paper that may have a negative impact on the historic environment. Moving away from land allocations in Local Plans to zoning of land may mean the impact of plan-led development on the historic environment isn't properly assessed and this could lead to negative consequences, including significant harm or loss of designated and non-designated assets unless the revised NPPF covers off that point.

Any reformed planning system should continue to safeguard and enhance the historic environment as one of its core principles.

## **7. What changes, if any, are needed to the Green Belt?**

It is clear that the Government affords great weight to the preservation of the Green Belt, with the current National Planning Policy Framework limiting inappropriate development in the Green Belt except for in exceptional circumstances, and there is also clear direction in the Planning for the Future White Paper that Green Belt land is to continue to be protected.

However, the Government's safeguarding of the Green Belt is illogical. Many sites which fall within the Green Belt are adjacent to existing urban areas, have no or limited landscape or biodiversity value, and could be developed without resulting in the coalescence of settlements. As such, the continued widespread safeguarding of the Green Belt means other non-Green Belt sites are preferred, and these are often in less sustainable locations with more associated planning harm. In short, ruling out Green Belt for substantive development as a matter of principle will compromise the ability to secure the most sustainable spatial development option in many locations.

The Government's commitment, therefore, to wholly safeguard the Green Belt should be reviewed, particularly in light of the Government's ambition to deliver 300,000 new dwellings per annum by the mid-2020s, as this is likely to mean future development is in the most sustainable locations. The combination of the Government's commitments to safeguard the Green Belt and deliver 300,000 new dwellings per annum run contrary to the primary aim of the planning system which is the delivery of sustainable development.

## **8. What progress has been made since the Committee's 2018 report on capturing land value and how might the proposals improve outcomes? What further steps might also be needed?**

Significant steps are needed as otherwise the common scenario of development not being able to fund or provide infrastructure, necessary to make the development sufficiently sustainable, will continue.

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