



Civic Voice
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By email:

TechnicalPlanningConsultation@communities.gov.uk

1st October 2020

Dear Sir/Madam,

Re: Response to Consultation on Changes to the Current Planning System (August 2020)

Introduction

Civic Voice is the national charity for the civic movement. We are campaigning for a more accessible, balanced, collaborative, and democratic system, as set out in our Manifesto¹. Since we set up in 2010, we have been joined by hundreds of volunteer-led, community based civic societies with over 76,000 individual members. Civic societies exist in over 70% of local authority areas and are one of the most numerous participants in the planning system. 71% of our members agree that the country needs to build more homes and we submitted this as part of our evidence to the Building Better Building Beautiful Commission (BBBBC) in April 2019.

Since the *Planning for the Future White Paper* and accompanying *Changes to the Current Planning System* were published for consultation on 6 August 2020, Civic Voice has been meaningfully engaging with its members through a variety of surveys, member briefings, webinars and newsletters to gain views on the proposals from across the civic movement². Whilst we are partway through this consultation exercise and will submit a full response to the White Paper in due course, there are some key themes emerging from the feedback, which are relevant to this consultation document. Our response is informed by this consultation, by our manifesto calls and our evidence submitted to the BBBBC³ last year. Civic Voice does not feel it appropriate to respond to the specific questions within the consultation document but, in the spirit of helpfulness, offers the following general comments on the policies underlying the mechanisms being proposed, based on members' feedback to date.

Proposed new standard method for assessing housing numbers in strategic plans

Civic Voice supports the principle of having a clear, simplified and standardised methodology to calculate the level of housing that local authorities should plan for, to remove lengthy debates over housing figures and to provide certainty in delivering the homes the nation needs. We also support the Government's ambition to tackle the housing crisis. However, we believe the real crisis is about providing more genuinely affordable and social housing as a proportion of the new housing coming forward rather than arbitrarily increasing figures. We cannot support the proposed standard method as we are concerned that it will not provide the right homes in the right places, the overreliance on affordability in the calculation will lead to perverse outcomes in

¹ http://www.civicvoice.org.uk/uploads/files/Manifesto_FINAL_Screen_version.pdf

² <http://www.civicvoice.org.uk/campaigns/planning-for-people/> and <http://www.civicvoice.org.uk/get-involved/events/>

³ <http://www.civicvoice.org.uk/campaigns/beautiful-broadband-britain/>

the figures for some local authorities and we are not convinced it will provide the certainty or level of housing delivery the Government wishes to see.

‘Levelling up’?

We have reviewed Lichfields’⁴ analysis of the proposed figures compared to existing rates of housing delivery (Figure 3) and are particularly concerned that the proposed method appears to lead to further ‘overheating’ of London and the South East, with some very large increases in housing numbers, yet large parts of the North will experience a reduction. This seems to be at odds with the ‘levelling up’ ambitions of the Government, with the emphasis still on high-growth areas, with little intervention to help areas where viability is the key challenge, rather than affordability. Civic Voice believes that housing provision cannot be tackled in isolation, it must be considered and planned together with employment opportunities and the infrastructure requirements to help support and build communities. Large scale housing development must be co-ordinated strategically as part of a wider framework, linking in with major/national infrastructure development. We are concerned that the proposed standard method will perpetuate existing geographic economic inequalities across England.

Impermanence of figures creating uncertainty

A standard method was introduced in 2018, was later adjusted, and is now proposed to be adjusted again through the proposed new standard method, to boost housing supply quickly. The White Paper also proposes a fourth further adjustment taking account of both local housing need and constraints to provide a binding housing requirement for local authorities. So many revisions to the standard method within such a short space of time shows how complex planning for new housing is and we consider further ‘tinkering’ of the methodology before the White Paper reforms will only create more uncertainty within the system. The calculations undertaken by Lichfields⁵ showing the impact of the proposed new standard method on each local authority demonstrates the current impermanence of local housing figures. When the housing figures keep changing, and in some cases quite dramatically, this is confusing for communities. We question how local authorities are meant to plan effectively for their development needs, and for communities to meaningfully engage in that process, in this situation?

Housing market failing to deliver

Whilst we support the Government’s ambitions to deliver 300,000 homes annually, this level of delivery hasn’t been achieved since the 1960s, where a significant amount of Council house building boosted supply. This is not the case today. We fear that, fundamentally, there simply isn’t the capacity or inclination in the current housing market with the housebuilding industry’s business models to deliver that level of housing, regardless of the overall figure proposed through the new standard method (337,000 per annum). The housebuilding industry relies on a steady rate of delivery and over-supply could result in a drop in price, making some schemes unviable. So, the aim to build more housing is unlikely to be realised.

⁴ <https://lichfields.uk/blog/2020/august/7/setting-a-higher-standard-a-new-method-for-assessing-housing-needs/>

⁵ <https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/>

Para. 9 of the consultation document acknowledges that allocating sufficient land in Local Plans *'does not ensure that the homes are actually built – that is reliant on wider market conditions...'* Therefore, it is imperative the Government addresses some of the other factors preventing increased housing delivery such as the failure of the housebuilding industry to implement existing planning permissions. This is estimated by the LGA⁶ to total more than 1 million homes since 2009/10, which could make a significant contribution.

Transition

We support the need for transition arrangements to prevent further delays in plan making for those Local Plans that are close to examination or adoption. However, the implication of the proposed arrangements is that those Local Authorities that have 'done the right thing' and have an up-to-date plan in place will now have to re-start the whole process on the new figures. The focus should be on those Local Authorities that do not have an up-to-date Local Plan and have been unable to plan for their needs.

Changes to affordable housing provision

Civic Voice members have been clear in their feedback that they support the need for more housing but the focus for Government should be on increasing the number of genuinely affordable homes, if it wants communities to be more supportive of new housing proposals. The introduction of First Homes, discounted by at least 30% of the market price, could be a welcome additional product, but we are not convinced this will bring the step-change in provision of genuinely affordable homes that are needed across the country. We believe Local Authorities are best placed to set out the mix of affordable housing tenure, that best meets local needs.

With this in mind, Civic Voice objects to the proposal to raise the threshold for affordable housing provision to 40 or 50 homes, for small and medium-sized builders (SMEs). Whilst we support efforts to encourage more SMEs to enter the market, we do not believe the potential benefits outweigh the impacts and are very concerned that this will reduce the amount of affordable housing coming forward, at a time when it is desperately needed. We consider the current thresholds in national policy (10 or more homes, or lower in some rural areas) should remain.

Extending permission in principle to major development

Civic Voice strongly objects to the proposal to extend permission in principle to major development as we are concerned that this consent route, with greatly reduced information requirements upfront, could lead to unintended consequences and poor quality outcomes. The consultation proposes that housing schemes of up to 150 dwellings, or a site size of up to 5ha, with no limits on the amount of commercial development, would benefit from the permission in principle route, with applications decided in 5 weeks with a 14 day consultation period. We do not consider Local Authorities will have sufficient or appropriate information to make quality decisions on major development via this route and the timescales involved prevent meaningful engagement with communities. Schemes of this size could have major impacts on the character,

⁶ <https://local.gov.uk/lga-responds-planning-proposals>

appearance, amenity, and infrastructure provision of the local area and as such, we believe they must be fully considered by Local Authorities through the normal planning application process.

We appreciate that permission in principle may form part of the consent routes coming forward in the Government's wider planning reforms but we would anticipate that if new style Local Plans are brought in, significant wider preparatory work would be undertaken to assess the suitability of land as Growth and Renewal areas. Until this time, it is inappropriate and premature to widen permission in principle.

We hope these comments are helpful and we will be responding fully to the wider White Paper consultation in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ian Harvey'. The signature is written in a cursive style with a large initial 'I' and 'H'.

Ian Harvey

Executive Director
