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FAO:

Angela Rayner – Deputy Prime Minister
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Jim McMahon – Minister for Housing, Communities and Local Government

Planning and Housing Policy **Recent Announcements**

I wish to provide some feedback in relation to the recent announcements regarding housebuilding and national planning policy. I am a Chartered Landscape Architect with nearly 40 years of experience and have run my own design and environmental planning practice for 25 years.

1.5Mn Housing Target. I have concerns about this very ambitious figure.

- **Housing delivery has been fixed at around 200,000 a year since the 1970s.** The UK building industry would need many years of recruitment, training and capacity expansion to increase to over 300,000/year. It is not impossible, but it will take years to achieve.
- **Are that many 'new' homes actually needed?** In West Norfolk, where I live, 1 in 20 houses are understood to be '2nd homes' (often large and palatial houses that remain unused for most of the year). In addition, there are 4000 empty houses (government figures), plus empty shops and commercial buildings. Some of these buildings in the centre of King's Lynn have now stood empty for many years – even decades. There are a number of notable extant planning consents for conversion of disused buildings to houses that have not been progressed (5 schemes alone could deliver 140 new flats if they proceeded). There are floors above shops that remain unoccupied. Then there is the matter of elderly residents left in large family-sized residences who might welcome an opportunity to downsize if good-quality wardened-housing was available. Therefore, in this Borough alone I am confident there are thousands of opportunities to deliver new homes through better utilisation of existing building stock. 10,000 'new homes' delivered like this would more or less cancel out our Local Plan housing requirement for the next 15 years. I have no doubt this pattern could be illustrated in many other areas.
- **Cost of housing:** It is the cost of housing that prevents many people from acquiring their own property. There is widespread agreement that the 'privatisation' of the rental market and lack of social rental housing has exacerbated this problem and needs to be changed. But the cost of house building also needs to be reduced.
- **House construction:** The UK housing industry (and apparently the house buying public) remain obsessed with bricks and mortar as the principal UK construction technology – which is slow and expensive to deliver and weather dependent. The building industry needs to make a wholesale shift toward prefabricated buildings that can be built in factories and brought to site in kit form. Such technologies could also ensure the delivery of low carbon, energy efficient and more easily recycled/repurposed building stock. This need is all the more pressing with climate change bringing wetter winters that make on-site building conditions more challenging.

Mandatory Housing Targets. My view is that imposing mandatory numbers on local authorities undermines local democracy.

- NIMBYism exists – but in my experience most people recognise that new housing is necessary and are prepared to accept it and help plan where it can go for the benefit of their local community. The Neighbourhood Planning system would seem to prove this. What residents tend to question is the type of housing being offered (e.g. large 4 and 5 bedroom ‘executive homes’ expanding villages when sons and daughters cannot afford to live locally); the provision of settlement expansion without equivalent infrastructure delivery; and, ill-conceived schemes that diminish local character.
- If government imposes fixed numbers to areas, then these genuine concerns and arguments lose ‘weight’ in any planning decision. Effectively local planning departments (and the planning inspectorate at appeals), will always have to come down on the side of providing the numbers. *‘It is a poor scheme that will harm the setting – but it provides 30 houses toward the required total and therefore I grant consent’.* This simple numbers game will not help achieve good planning, sustainable communities or the acceptance of settlement growth.

Green Belt / Grey Belt. This is not especially relevant to Norfolk because our nearest Green Belt is Cambridge. But I have undertaken a number of planning reviews looking at Green Belt land around Cambridge and in the West Midlands in order to review opportunities to release it for development purposes.

- It is important to remember that Green Belt policy is a planning tool designed to prevent urban sprawl and settlement coalescence around large urban areas. It is not directly related to landscape quality (although some land within Green Belt may have special landscape values). Therefore, by building in Green Belt you are effectively making the likelihood of settlement coalescence more probable (or at least reducing the physical gaps between settlement to perhaps narrow and less functional corridors). It follows that new areas should be designated as Green Belt to compensate for any proposed loss.
- In studies I have undertaken I have identified large areas of farmland with declining condition and landscape amenity value. This is often related to styles of landscape management. ‘Horsiculture’ is often a problem for planning authorities, leading to a decline in hedgerow management and a ‘clutter’ of stables, other small buildings and fencing types. A host of other non-traditional land use can substantially alter landscape character. Agriculture may become less viable when close to urban areas for a number of reasons. This may lead to the ‘Grey Belt’ as I think the term is meant. It is not really traditional farmland but its not settlement either. I would ask whether Local Authorities should be given stronger powers to enforce appropriate land management, rather than turning to the ‘nuclear option’ of releasing large areas for wholesale settlement expansion.
- A case I have made in reports is that if it is decided to release Green Belt land for housing development, it should be balanced by delivery of improved green infrastructure that will benefit the whole community (existing and proposed). This would ideally be funded by/enabled by the new development. This would very much fall into line with recommendations that Natural England made 15-20 years ago with their *Access to Natural Greenspace Standard (ANGSt)*.

New Local Plans. It would help if central government didn't keep moving the goalposts...

- The principal reason many local authorities do not have a recent local plan in place is because government repeatedly alter the planning system, meaning that local authority planning departments have to review and revise work they have already undertaken. All stages have to be consulted upon, which takes significant time, and need to be supported by elected councillors (who themselves are on a 4-year electoral cycle and are frequently not knowledgeable about planning and the planning system). Additionally, the funding restrictions on local authorities have limited the number of staff in planning teams. In my experience most authorities only have one or two strategic planners, generally supported by one or two graduates.
- In any case, a plan older than 5 years old is unlikely to be a significant barrier to sound planning decisions. Typically, older plans have had amendments and updates that address significant issues and government policy changes. Arguably it is more important that supporting supplementary guidance such as design guidelines and landscape capacity studies are in place and up to date.
- Overall, it is my view that, whilst it would always be desirable to have a recently reviewed Local Plan in place, making it a mandatory requirement will not in itself be especially helpful to anyone. If this is made a goal – then central government will need to provide a more stable policy setting, and ensure that planning departments have adequate resources to fulfil target programmes.

Land Values / Paying for Infrastructure. Landowners often aggressively market their land for development allocation and extract huge profits from the subsequent uplift in land value. Such profit seeking hampers housing delivery.

- Successive governments have promoted the idea that brownfield land should be developed before greenfield land – but the fact remains that brownfield land often has pre-commencement costs (clearance/decontamination) that make it less viable for development. Until money is made available to act as a catalyst to commence development on brownfield land (even those with extant consents) I suspect a lot of sites will continue to sit derelict.
- However, the development of greenfield sites is often hampered by what can only be described as greedy landowners (often institutional groups that have acquired farmland at agricultural prices simply to look for opportunities to benefit from any land value uplift). Why is it acceptable to buy land for £10,000/acre and sell it for £200,000/acre (or more) without actually delivering anything? This windfall profit should be aggressively taxed! That tax could go toward funding public infrastructure – and might curb the enthusiasm to build on green field land (and therefore make brownfield land more viable).

Sustainable Development. In the 21st century the principal criteria that should be guiding planning, and therefore the selection of development sites and the construction of new settlement is meaningful sustainability. Sustainability has been a vague term in planning for many years – but we now know it must mean development that can deliver a carbon zero future.

- Sites must be selected for resilience in the face of climate change. Sea level will rise; extreme weather and flooding will be more prevalent; water supply is critical for growing communities. Continuing to intensify settlement in the south-east, especially in river valley and coastal settlements is clearly questionable. (It is an ideal reason to prioritise the regeneration of northern cities and towns that have previously lacked investment).

- Using development to shape and deliver cost-effective sustainable infrastructure that will benefit existing and new settlement must be encouraged as a key priority when allocating new land for development. In West Norfolk our largest land allocation will be totally dependent on road transport. The existing roads will not take the increase in traffic so a £85M 'access road' is proposed¹. But the road will not enhance the local road system – it is simply 1.3 miles of parallel 'bypass'. It will simply exacerbate existing traffic congestion in the wider setting. It does not represent good value for the taxpayer or offer benefits to the wider community.
- Moving toward a rail/active travel model for new settlement is being widely adopted across Europe and many other parts of the world and is demonstrably successful at delivering low carbon communities and efficient transport. Settlement planning should seek to maximise opportunities for delivering communities that can rely on this type of infrastructure system.
- At the single-house unit scale, dwellings should have the highest level of energy efficiency, low embodied energy and excellent flexibility for later alteration/repurposing and end of life recycling. New-build that cannot support a low carbon footprint either in construction or operational stages should not be acceptable within the planning system.
- 'Grand Designs' (with 6 bathrooms and a woodburning stove in every room) should be actively discouraged by the planning system if it is to support low carbon lifestyles.

New Towns – New settlements may well offer benefits for housing delivery if appropriate sites can be identified.

- I can see the benefit in developing whole new towns if they can ensure the high sustainability requirements that are partly outlined above. They will need to offer resilient sites that can benefit from sustainable transport systems. Complete new towns will obviously need the new facilities and amenities that create a community.
- Brownfield land such as airfields and military sites would seem to offer good opportunities if they can be linked by sustainable transport.
- Large-scale housing estates on the edge of existing settlements (as are being proposed in several towns across East Anglian including King's Lynn), are not 'new towns' even if they have the population size of a town. They are often bereft of any amenities that the existing population will benefit from and they will increase pressure on established local infrastructure. Developments such as Waterbeach and Northstowe near Cambridge appear to offer better opportunities for community building through their commitment to new public infrastructure – although they will still be very dependent on the city of Cambridge for work and education.

Drop 'Build Beautiful'. In my view there is nothing of substance to 'drop' with this slogan (except the coffee-table book that accompanied its launch in 2020!)

- Nevertheless, too much new housing is bland, indistinguishable and poorly constructed. High quality design and a commitment to characterful and aesthetically pleasing architecture should be at the heart of local planning guidance. When Prof Matthew Carmona (Place Alliance) undertook research, he concluded that good design guidance and enforcement by local planning authorities was the single most significant contributor to delivering high quality outcomes.

¹ £85 at current prices where scheme not fully designed and not tendered. £50M required from central government.

- The 'Build Beautiful' mantra also tends to overlook the innumerable utilitarian constraints that prevent the delivery of good design on the majority of building sites. These include slavish adherence to 'standards' enforced by Highway Authorities, utility companies and third-party consultees (including the Police through their '*Secure by Design*' rulebook). Invariably such 'standards' are driven by questionable assumptions built on flimsy 'knowledge' and a desire to drive down cost and 'risk' (e.g. by eradicating any perceived future management responsibilities). These are the mundane matters that regularly reduce design plans to the minimal bland schemes we so often see in new development. It is not a lack of vision or ability from the developer or design team but represents their submission to intractable third parties.

It is frustrating to hear politicians and other commentators trotting out the same old lines about a 'housing crisis', a planning system that is 'unfit for purpose' and how developers are causing a problem through 'land banking' etc – when actually the issues with delivery of high-quality sustainable development are more convoluted and invariably more mundane. But ripping up the existing planning system will not help matters.

Lastly, I would add that if a principal driver of committing to increased housing delivery numbers is to 'grow the economy', then addressing the replacement or regeneration of existing housing stock is very likely to achieve that goal – irrespective of new build. There needs to be a national conversation about whether upgrading and retrofitting older housing stock to receive fossil free energy and to meet energy efficient standards is actually viable and cost efficient. A lot of housing stock may just need replacing. Addressing this and providing the resources would represent a massive economic driver for decades to come.

Yours sincerely

Richard Morrish.