

Planning Policy Consultation Team  
Planning Directorate – Planning Policy Division  
Department for Levelling Up, Housing and Communities  
Floor 3, Fry Building, 2 Marsham Street, London SW1P 4DF  
PlanningPolicyConsultation@levellingup.gov.uk

2nd March 2023

## OPEN CONSULTATION

### **LEVELLING-UP AND REGENERATION BILL: REFORMS TO NATIONAL PLANNING POLICY**

#### RESPONSE FROM CLIDDESSEN PARISH COUNCIL

Q.1: Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) for as long as the housing requirement set out in its strategic policies is less than 5 years old?

Yes – strongly agree that LPAs should not be constantly required to expend resources defending against speculative applications that run counter to the Plans agreed in consultation with communities.

Q.2: Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

Yes – strongly support the remove of 'buffers' which add unnecessary pressure and complexities.

Q.3: Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?

Yes – support past delivery being taken into account, but clarification is needed as to the time frames.

Q.5: Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

Strongly support giving increased weight to Neighbourhood Plans. Strongly support extending protection to Neighbourhood Plans up to five years instead of the current two years, where LPA housing policies are deemed out of date. However this protection should be afforded to all Neighbourhood Plans including those without housing allocations.

Q.6: Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

Strongly disagree that the case for housing and development should be further strengthened at the expense of other, such as environmental,

considerations. This would seem incompatible with declared climate and environmental emergencies. The Framework should be clearer about the primary importance of protecting natural environment and biodiversity.

#### Q.7: Local housing need and the standard method.

Strongly opposed to the 300K housing target.

Strongly opposed to the continued use of the Standard Method.

It is these two policies – in their own right and in combination – which ‘inhibit plan making, fuel opposition to development and ultimately hinder the supply of high-quality homes where they are needed’.

The Standard Method is not fit for purpose, citing the following reasons:

1. Use of the nine-year-old 2014 based national household projections.
2. Use of partially estimated 14-year-old data inputs.
3. Ignoring the up-to-date results of the 2021 Population Census.
4. Use of an economically illiterate affordability concept which artificially increases every figure by up to 33%. This approach has been rejected by the Tillingham Hall planning inquiry, the Bank of England and current market realities which all demonstrate that house prices are dependent on the cost and availability of credit and not marginal changes in housing supply. New housing in our area is more expensive than the existing stock due to the ‘new homes premium’ in spite of sustained high levels of house building.
5. The Secretary of State in giving evidence to the Housing Select Committee on November 8th 2021, accepted that building new stock had little impact on house prices.
6. The underlying algorithm assumes only one income per household and is an unstable basis for long term planning since it is based on six monthly updates.
7. The housing figure is calculated for 10 years but applies to the whole of the 15 year Local Plan time span thus denying any change in local housing need for a third of the life of the Local Plan.

The Standard Method – being shown to be an arbitrary and unsound method of calculation – in itself creates the demand for ‘exceptional circumstances’.

The NPPF should instead – clearly and explicitly – provide for LPAs to calculate a locally derived, objectively assessed, and locally accountable housing figure – taking account of up-to-date data, a robust local evidence base and all local constraints. Therefore fully taking account of the local character of the area. It is recognised that established and tested models such as Chelmer model have been put forward as a basis for such a calculation.

#### Q.8: Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

As answer to Q7. The removal of the imposed Standard Methodology would remove a need for exceptional circumstances. The introduction of an objectively assessed, locally derived housing figure would allow every LPA to take account of its unique combination of circumstances.

A policy of 'exceptional circumstances' which resorts to citing a few specific examples is limited in concept, and arbitrary and exclusive in application, it fails fundamentally to take account of the complexities of place and plan making. Such attempts to 'patch up' the failings of the Standard Method does not mitigate its shortcomings.

'We would welcome views on the sort of demographic and geographic factors which could be used to demonstrate these exceptional circumstances in practice.'

If such policy were to be pursued then an example of truly exceptional circumstances would be areas which have experienced a massive and forced influx of population and whose geographic factors are unable to support continued growth on this scale.

To consider Basingstoke and Deane, and to consider Basingstoke as a London overspill town. Consider also the New Towns Acts – one of the most significant 'planning movements' of the 20thC. The 1948 Act designated eight London overspill New Towns. Basingstoke is not one of these planned New Towns. Yet designated an overspill town in 1961, this decision called for 37,000 people to be moved from London to Basingstoke. The town's population rose from 16,000 in 1961 to 75,000 by 1981. Basingstoke was subsequently part of the South East Diamonds for Investment & Growth Partnership which – 2006 onwards – sought to provide the majority of economic and housing growth in the south-east.

However Basingstoke's geographic location, its aquifers and young rivers, cannot sustain the ongoing consequences of its forced and massive growth profile over the last 60 years – as required to be ongoing by the Standard Methodology – at a location geographically unsuited and originally unplanned for such growth. Basingstoke's combination of exceptional growth, and the environmental constraints imposed by its geography, require an alternative approach to how future growth is planned.

Q.9: Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out-of-character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

Agree with the of principle of Green Belt land and the principle of not planning for out-of character housing densities. But do not agree that these are the only issues which warrant particular mention or exceptional treatment. An objective, locally accountable housing calculation model would take account of Green Belt and housing density – where appropriate – with all other local constraints which would form its evidence base.

Q.16: Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

Yes – agree with a reduced land supply requirement for emerging Plans. However to apply this to all emerging Plans whether or not they have reached Reg 18 consultation. This would encourage LPAs to start their Update process and not penalise those at an early stage.

Q.37 How do you think national policy on small scale nature interventions could be strengthened? For example in relation to the use of artificial grass by developers in new development?

Strongly support wide ranging and comprehensive measures for 'Embracing wider opportunities to support biodiversity' and supporting nature recovery. Strongly support measures to further protect ancient woodland and significant trees. (The use of artificial grass in any development, new or existing, should be banned other than for use such as sports pitches.)

Q.38 Do you agree that this is the right approach to making sure that the food production value of high value farmland is adequately weighted in the planning process, in addition to current references in the Framework on best and most versatile agricultural land?

Strongly support the protection of agricultural land for food production in combination with measures to increase biodiversity.

Q.44: Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

Yes – strongly support, including use of the term 'significant weight' and the inclusion of large non-domestic buildings. However the changes relating to climate change should be more far reaching. Stronger wording in the NPPF should incentivise / require developers to address climate change. Government should enable those LPAs who have declared a climate emergency to set their own local planning policies now to help address issues. More clarity regarding planning for green field solar farms would also be welcomed plus significant weight given to how these schemes can be planned to support biodiversity.

Q.48: Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

The removal of Supplementary Planning Documents from the planning system is a cause for concern, Government should consult further on this matter.

Q.49: Do you agree with the suggested scope and principles for guiding National Development Management Policies?

Disagree with the introduction of National Development Management Policies (NDMPs). The statutory nature of NDMPs would take over the role of Local Policies and decision making, reducing the ability of local communities to shape their areas. Localism is a key pillar of the planning system and this must not be diminished. NDMPs should not have precedence over Local Plans.