

RESPONSE TO THE GOVERNMENT'S CONSULTATION CHANGE TO THE CURRENT PLANNING SYSTEM FROM SIR GEOFFREY CLIFTON-BROWN MP F.R.I.C.S

Q1. I understand the Government's desire to increase housing numbers. Whilst a formula or algorithm (the standard method) which if correctly designed will always achieve this (viz Para 40, 337,000 additional houses). It is a very blunt instrument that does not take into account any local variation.

In principle it appears to skew development into the South East and Central South where development is already under severe strain. Instead we should be using our infrastructure to encourage more businesses to locate in other areas of the UK where there is currently lower demand.

The formula does nothing to revive some of our inner cities where transition from commercial to residential is easy. Often brownfield sites are located there. Finally, it does nothing to reduce 500,000 empty flats above shops.

There is particular concern about the interaction between housing numbers between this consultation on changes to the planning paper and the Planning for the future consultation. So, for example this consultation deals with numbers for housing needs whereas the white paper deals with housing requirements, the concern is that one could increase the other.

There is concern that the housing number in this consultation could be introduced very quickly, before all the other planning matters in the planning white paper are considered. Whereas the two should be considered together.

In high demand areas there is no ability to moderate the formula according to local circumstances.

In my constituency, the Cotswolds 80% is designated as A.O.N.B. so the proposed 151% increase (480 pa to 1209 pa) of the 10 year housing projection is probably undeliverable in the remaining 20% and if it was it would so destroy those areas by excessive development that the wealth creators would relocate leaving totally demographically unbalanced areas. The whole constituency including the 20% has the highest percentage of listed buildings outside London and a very high number of conservation areas.

There is concern that the duty to cooperate with other authorities is being abolished if the Cotswolds are required to take the proposed numbers, the only way that they may be able to be delivered is by cooperating with other local authorities.

The local plan inspector said it would be difficult to deliver more than 200 house a year in Cirencester which is by far (17,000 to 5,000) the largest settlement in my constituency. This demonstrates the irrespective of the AONB designation, it would be almost impossible to find

suitable sites for the remaining 1000 houses in the remaining ten larger settlements.

This would then break up the Cotswolds as the unique area that it is. There must be some areas in this country that are regarded as so special that they must have some moderation to the formula. Otherwise the very areas of the country that visitors and tourists come to see will be lost to future generations.

Q2. No. Planning permissions are very different to the actual number of houses built.

Q3. NO. To incorporate affordability into a formula which is designed to increase house numbers is to confuse two different issues.

It appears that the adjustment factor in the formula is overly weighted towards affordability, which appears to be used twice in the formula.

My constituency, the Cotswolds, has the highest affordability gap in the South West.

The current formula as proposed will certainly enormously increase numbers but will not necessarily improve affordability.

This is because developers in the Cotswolds have historically and will continue to build expensive 4 to 5

bedroom houses because they can make more profit, using up evermore greenfield sites.

Whereas to solve the affordability problem many more 1 and 2 bedroom houses and flats of all tenures for the young and old are required.

It would be completely self-destructive if the formula sucked enormous housing numbers and did not solve the affordability problem.

It is highly questionable whether average house prices in an area of high demand like the Cotswolds will ever be significantly reduced by building more houses, particularly the wrong housing mix. All that will happen in areas like the Cotswolds is that we will become a dormitory for other areas where job creation is higher.

This problem is important in my constituency because the demographics of an ageing population in the Cotswolds are already skewed by planning policies and decisions.

The young particularly in the public sector largely cannot afford to live in the Cotswolds.

There is a fundamental flaw in the paper in the assumption that increasing housing numbers will solve the affordability gap.

Q4. NO. See above.

Q5. NO. The formula must be adjusted so that affordability and the housing mix is improved and that the total numbers are not disproportionately increased in a flawed way to solve the affordability problem.

Q6. I understand and agree that the Government need to revise local plans as soon as possible. But given that even more weight is to be placed upon them particularly in the designation of growth areas proposed in the Planning White Paper, I am very concerned that the public must by guidance be given adequate opportunities to make representation to the plan.

Q7. See above regarding time for representations.

Q8. I understand the Government's priority to deliver 25% affordable first houses. As this will be a considerable (rightly) variation in the existing policy in some areas, the Local Authority should be given discretion on the remaining affordable housing.

Q9. YES.

Q10. NO.

Q11. NO.

Q12. YES.

Q.13 A 30% minimum discount seems quite high. It should be kept under review as to whether it is acting as a deterrent

to development. 25% might be more realistic with LA discretion to vary it upwards.

Q.14 Strongly agree.

Q15. Agree.

Q16. The Cotswolds has a high % of A.O.N.B. In some areas it might be appropriate and could enable young people to remain in the countryside.

Q17. Strongly No. In the Cotswolds which is an area of high demand, small sites in rural areas have been historically restrained by planning policy, not price. If this were solved many small exception sites in villages would become available without a threshold which merely inflates prices and means that the particular village would miss out on the necessary infrastructure provided by developer contributions.

Q18. Leave this to LA discretion.

This is because in areas like the Cotswolds about half the affordable homes are delivered from sites of less than 50 houses. The concern is that developers could bring forward smaller sites earlier than they might have done to come within the temporary small sites threshold. So, the delivery of affordable housing in subsequent years will be more difficult.

Q19. NO.

Q20. Unnecessary in some cases.

Q21. Question is ambiguous.

Q22. YES.

Q23. Firstly, define SME's? Secondly, any measure of exemption needs anti avoidance regulations otherwise large builders will simply form small subsidiaries. But do agree that SME's often produce better quality housing.

Q24. A qualified YES. Provided the provision is not going to allow developments to be built in growth areas whatever the circumstances ie that the LA will be able to impose technical conditions at a later stage and that full consideration will be given to this even if the application goes to appeal. Permission in principle must not override these conditions for example building in the flood plain, infrastructure mix, adverse comments by statutory consultees, build out times etc.

Q25. This is wrong or it could lead to a trojan horse for excessive commercial development. What does "Housing-led" development mean? There should be a percentage limit.

Q26. NO. Local democracy demands maximum disclosures. So layout plans, housing mix, design code adherence etc

A broad statement on developers' contributions is essential information for local people to form a view and make representations.

Q27. YES essential.

Q28. YES. Maximum publicity required, particularly for large applications.

Q29. Generally, any development whether a small private one, or a large developer led one, is going to involve a substantial increase in capital value. Planning departments are always underfunded so I believe realistic fees should be allowed to fully recover their costs. Not sure there should be a cap? Maybe modified for large applications.

Q30. See previous answer.

Q31. Strongly agree.

Q32. See my answer to Q.24. Provided Local Authorities are reassured that their reasonable technical conditions will not simply be disallowed at appeal. They will readily engage with Permission in Principle.

Q33. See my caveats in Qns 24 and 32. But overall there is much to be gained, speeding up the process, reducing costs to Applicant and Local Authority.

Q34. YES given the above.

Q35. No provided the guidance is clear.