

**DEPARTMENT FOR COMMUNITIES AND LOCAL GOVERNMENT
(DCLG) CONSULTATION PROPOSALS 'PLANNING FOR THE RIGHT
HOMES IN THE RIGHT PLACES', ISSUED SEPTEMBER 2017.**

**RECORD OF THE RESPONSE FROM LITTLE CHALFONT PARISH
COUNCIL**

The DCLG's consultation document can be found at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Homes_Consultation_Document.pdf

The document proposes a new system for local planning authorities to use in calculating their 'Objectively Assessed Need' (OAN) for new housing, and contains a list of questions for consultees to answer.

The Parish Council decided to answer only those questions on which it had appropriate knowledge to enable it to form views. Background to the questions will be found in the consultation document.

The answers were submitted via an electronic survey on 29 October 2017, meeting the deadline of 9 November. The questions selected for answer by the Parish Council, and the answers given, are set out below.

Question 1:

a) do you agree with the proposed standard approach to assessing local housing need? If not, what alternative approach or other factors should be considered?

Answer to Q1a

No, we do not agree that a standard approach is appropriate.

In an evident search for a simple, practical formula which could be applied across all planning authorities, the analysis makes two fundamental errors: (i) it confuses housing need with housing demand; and (ii) it bases the proposed formula on the simplistic contention (in para 13c) that "High house prices indicate a relative imbalance between the supply and demand for new homes, and makes housing less affordable. The affordability of new homes is the best evidence that supply is not keeping up with demand."

Both of these errors are a result of ignoring the prime determinants of housing demand and pricing, namely "location, location, location". Therefore, the search for a universal formula is misjudged as each planning authority's area will differ from others, for example in the importance of constraints – see the second paragraph below.

Constraints. There is a conflict between the references to constraints in paragraphs 9 and 48 in the proposals. If constraints, such as the green belt, are to be taken into account in making plans (paragraph 9), how can it ever be right in any circumstances that they may not be taken into account in calculating the 5-year land supply (paragraph 48)? To leave the matter of constraints for LPAs and appeals inspectors to decide only in relation to individual planning applications would be inconsistent with paragraph 9, and with the principles of environmental protection as practised in the UK. Such a policy would also shift the balance of power too far in favour of the developer.

More broadly, the consultation proposals contain no details of how the new system is to accomplish environmental protection by satisfactory application of the constraints. Rather, the proposals appear designed to make the constraints subordinate to housing need in all cases. This is wrong, and revised proposals should be issued to correct the policy. Inadequate application of the constraints would do disproportionate environmental damage to South East England, and to our region in particular.

Household Growth Projections. We understand that the National Office of Statistics projections for household growth (paragraph 16) look ahead only five years. We hear that many commentators on the White Paper challenged this period as inadequate. A period of ten years, as used by many local authorities now, would be more appropriate.

Capping. We agree in principle that the level of any increase should be capped, and at no more than the 40% proposed.

Question 5:

a) do you agree that the Secretary of State should have discretion to defer the period for using the baseline for some local planning authorities? If so, how best could this be achieved, what minimum requirements should be in place before the Secretary of State may exercise this discretion, and for how long should such deferral be permitted?

Answer to Q5(a) Yes. This should apply not only to those authorities “collaborating on ambitious proposals for new homes” (paragraph 49), but to those such as Chiltern and South Bucks where a great deal of work has already been done by the planning authorities, parish councils, community associations and thousands of individual members of the public on an emerging plan which is close to completion but will not quite meet the 31 March 2018/NPPF deadline. A modest but adequate extension should be allowed in such cases, if the local planning authority so requests, for example where public consultation on a draft Local Plan consultation has started, or commences in 2018.

Question 6: *do you agree with the proposed transitional arrangements for introducing the standard approach for calculating local housing need?*

Answer to Q6. No. The arrangements proposed in paragraphs 52-55 are unfair to our community for the reason given under Question 5(a) above.

Question 11:

a) should a local plan set out the housing need for designated neighbourhood planning areas and parished areas within the area?

Answer to 11(a) No. It is not the purpose of neighbourhood plans, or of parish councils, to satisfy the housing needs of wider areas, but to establish how other community needs and desires will be taken into account in conformity with an adopted local plan for housing. The allocation of specific amounts of housing to each neighbourhood or parish would provoke inappropriate planning applications designed to fill what developers would perceive and broadcast as a 'quota'.

Question 12: *do you agree that local plans should identify the infrastructure and affordable housing needed, how these will be funded and the contributions developers will be expected to make?*

Answer to Q12. Yes. However, we are very concerned that the proposed £2.3 billion fund will prove to be grossly inadequate for the size of development envisaged in the paper and accompanying local OAN calculations. We hope this budget will be increased.

Question 19: *having regard to the measures we have already identified in the housing White Paper, are there any other actions that could increase build out rates?*

Answer to Q19

To reinforce the proposed principle of "ensuring infrastructure is provided at the right time in the right places", appeals inspectors considering development proposals should be instructed to pay more attention to the absence of adequate infrastructure, and should rigorously refuse proposals where it is not clear that this will be in place before population of a new development begins. Damage has been done to amenities for our community by several appeal decisions, for example on applications CH/2006/1772/OA (Former Sawmill Site), and CH/2013/2047/FA (redevelopment of former parking site to commercial unit and apartments) where in our view infrastructure needs were not adequately considered.
