

LYNSTED with KINGSDOWN PARISH COUNCIL

2 March 2023

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



Dear Sirs

Below is the response from Lynsted with Kingsdown Parish Council to the consultation on the Government's proposed approach to reforming the National Planning Policy Framework (NPPF).

Housing targets

Fundamentally, there needs to be an evidence-based housing target. It must be up-to-date, not based on the 2014 projections used to justify the arbitrary centrally-imposed housing target of 300,000 homes per annum. It should be accurate, removing the current problem that over-counts students and births in at least 50 districts. Local authorities should have the final say over how many homes are required and deliverable in their area, taking into account infrastructure and environmental considerations.

The housing targets must also reflect recent demographic changes such as the reduction in EU nationals living in the UK post-Brexit, and the change to working patterns caused by Covid. This will reduce the occupancy of office and other commercial space on a permanent basis, which can be converted to residential. Further, the 'levelling up' agenda should result in increased demand for housing in areas of investment in the Midlands/the North, as opposed to the already congested South-East.

The criteria for the Standard Method should be reviewed, as it does not make housing affordable and simply supports developers to build market homes where they want to.

Local Housing Need must be merely a starting point. Areas must not be expected to meet this need where they are subject to genuine constraints.

The Planning Inspectorate must no longer override justified local decisions that are sensitive to and reflect local constraints and concerns. Local communities MUST have a greater say in what is built in their neighbourhood.

Brownfield first

We would like to see clear policies in the NPPF that prioritise the use of brownfield land over greenfield.

Greenfield sites should only be allocated in Local Plans, or planning permission granted, where they will be used to build genuinely affordable homes or social housing for local needs - or where it can be proven that as much use as possible has been made of brownfield land, in particular providing more housing in town and city centres.

This test already applies in cases where local authorities are considering building large housing developments on currently designated Green Belt land - but it should apply across the country and on all Best Most Versatile (BMV) agricultural land.

Development on BMV land must be seriously restricted to increase the UK's food self-sufficiency. Russia and Ukraine produce over a quarter of the world's wheat and other crops, so future imports cannot be guaranteed. This will lead to food shortages and unsustainable increases in the price of staple foods such as bread and vegetable oils. We must protect our own home-grown produce and future food security in the UK.

Local authorities must prove they have utilised suitable brownfield land first. There is currently space to build 1.3 million homes on brownfield land which would avoid the wanton destruction of our national heritage. LPAs must also demonstrate they have brought empty homes into use.

If a local community has clearly judged a development to be inappropriate, there should be no circumstances in which planning permission would be granted on BMV land.

Local Plans and Developers

Environmental matters should be given greater weight than economic and social factors in plan-making and decision-making. The environmentally damaging presumption in favour of development where there is no plan or five year supply must be formally ditched.

Developers should demonstrate they have taken on board community concerns before a planning application is granted - and 'land-banking' should be outlawed, with permission automatically withdrawn if meaningful construction does not commence within two years.

LPAs should refuse planning applications from developers who have failed to meet previous deadlines. Further, LPAs should not be penalised under the housing delivery test when it is fault of developers that houses are not being built.

It is estimated that one million properties with planning permission are not being built, yet developers continue to submit proposals to concrete over our precious countryside.

All Local Plans should be subject to a referendum, as Neighbourhood Plans are. Authorities must be asked at draft plan consultation, as one of the soundness tests for local plan examination, if they have engaged with communities satisfactorily and acted on feedback received.

We strongly support the changes proposed to paragraph 11 and the five-year housing supply. It is essential that councils can plan, instead of being subject to speculative development and planning by appeal. The obligation on local authorities to maintain a rolling five-year supply of land for housing should be scrapped. The presumption in favour of sustainable development and the 'tilted balance' should not apply in relation to issues affecting land supply. LPAs that have historically overdelivered on housing should be allowed to lower the number of houses they need to plan for.

Urban areas must not be allowed to offload their responsibilities to provide new housing onto neighbouring green fields. The 'duty to co-operate' must be scrapped.

Yours faithfully

JULIEN SPEED

Chairman

Lynsted with Kingsdown Parish Council