

Oxhey Hall Residents Association

in association with

Three Rivers Residents' Associations

New Government Planning Rules Consultation

You probably heard the new Government's announcements at the end of July about changing planning rules to deliver more new housing. As part of this, the Government issued a draft National Planning Policy Framework (NPPF) for consultation.

The draft contains quite a few changes from the existing version. The key changes are:

- A revised set of targets for new housebuilding which, in general, materially increases the number of new houses that rural areas need to deliver whilst reducing the targets for larger towns and cities.
- Making the new targets a mandatory starting point.
- Weakening many of the protections for Green Belt land from development.
- Effectively removing any highways grounds to object to new developments.

Applying these rules to Three Rivers would require over 730 new homes being built each year in the district – a 175% increase on the level proposed in the draft Local Plan recently consulted on. All these additional houses would have to be built on Green Belt land.

Due to the impact on the local Green Belt and the local environment, Residents' Associations from across the district are against these proposed changes.

The consultation on the changes consists of 106 questions, covering a wide range of areas, and runs until midnight on the 24th September. Local Residents' Associations will be responding to the full consultation.

If you wish to support your Residents' Associations views, rather than respond to all the questions, attached are some suggested answers to five questions that are key to addressing our concerns.

- A)** Question 1 relates to the removal of the section making the Government's calculation of the required number of new houses advisory, thereby making Local Authorities use the inflated Government targets even where there are significant constraints on land availability due to Green Belt, National Landscapes, Sites of Specific Scientific Interest, etc.
- B)** Question 15 relates to a change in the calculation of the required number of new houses to base it on current housing stock rather than forward projections of housing need prepared by the Office of National Statistics.
- C)** Question 17 relates to an increase in the weighting given to affordability in calculating the required number of new houses. This change has a material impact on the housing numbers required in Three Rivers.
- D)** Question 28 relates to requiring Local Authorities to use the wider Green Belt, regardless of quality, to deliver the full housing target.
- E)** Question 71 relates to changes in the chapter covering the highways implications and the weakening of the tests that new developments have to pass successfully to gain planning permission. There is no specific question on this so the response is under a catch all question.

Responses can be sent to PlanningPolicyConsultation@communities.gov.uk.

Suggested Response

Question 1 - Do you agree that we should reverse the December 2023 changes made to paragraph 61?

No.

Whilst there may be merit in a centrally defined methodology to provide a baseline, not even the best centrally defined methodology can fully reflect local factors. In these cases, it is essential that policy allows for a flexible approach to using an alternative method where this can be justified. To do otherwise is to assume that the country is completely homogenous.

It is possible that a multi-factor, complex algorithm could minimise the likelihood of material variations from the central model being seen to the results of a truly local model, but the model proposed is highly simplistic and would not pass any rigorous statistical / actuarial testing.

As such, we would contend that allowance for using an alternative model to determine local housing need should be permitted under the policy, though this should be at least informed by the result of the central "standard" model. This is what the policy after the changes made in December 2023 allowed for and, therefore, that wording should be maintained. Anything else is a clear exercise of politics over scientific methodology.

Question 15 - Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No.

Whilst this method is certainly simple, it assumes that the past is the sole predictor of the future. Using this sort of assumption more broadly will result in a country focussed on that past, missing opportunities for the future and bound to repeating the errors of the past.

For example, by using existing housing stock as the base, an area that grew dramatically in the Victorian age due to linkage with coal or steel production or in the 1970's related to car production is expected to need as many new homes as an area based around modern new technology industries such as Cambridge.

Use of ONS projections meant that the core base of the algorithm could consider multiple factors including, but not limited to;

- current population / householding,
- changes in society / migration patterns / working patterns, and
- technological changes.

The proposed algorithm is already incredibly simplistic, to then remove the one properly modelled factor from it will further invalidate the method in terms of proper statistical and modelling practice.

Questions 17 - Do you agree that affordability is given an appropriate weighting within the proposed standard method?

No.

No evidence is provided as to why the increased weighting has been selected. This increase seems to be based on the assumption that changes in house purchase prices are solely due to issues with supply and demand of housing. This ignores the possible influence of the changes in mortgage costs as well as other factors such as increased money supply due to Quantitative Easing and cultural changes to view housing as investment assets rather than a place to live.

Question 28 - Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

No.

Sustainable development should be prioritised. However, it is not considered that the draft proposals will necessarily result in locationally sustainable sites. Whilst the brownfield first approach will likely result in more brownfield land being developed, such land could be inappropriately located in locationally unsustainable areas (for example with poor sustainable transport connections etc).

While the emphasis on previously developed and grey belt land might also seem reasonable on the surface, the reality is that these areas are often critical buffers that protect our countryside, maintain the character of our rural communities, and prevent urban sprawl.

"Grey Belt" land often serves essential roles in supporting wildlife, providing green corridors, and offering recreational spaces for residents. It needs to be clear that these additional criteria should be properly considered before land is made available for development.

Beyond the brownfield and Grey Belt land, building in the wider Green Belt should not be permitted lest the whole purpose of the Green Belt is undermined and significant irreversible environmental damage is caused.

In conclusion, while your proposals may appear to promote sustainable development, we believe that a much more nuanced approach is required to produce truly sustainable development.

Question 71 - Do you have any other suggestions relating to the proposals in this chapter?

We strongly object to the proposed change to paragraph 115 of the existing NPPF. The addition of the phrase "in all tested scenarios" will discount the situation where, in 90% of scenarios, a proposal has potentially horrendous (and fatal) impacts on highway safety or on congestion (with its knock-on effects for air pollution).

And if it is left to applicants to decide on the scenarios to test it is hard to imagine that applicants will ensure that one scenario (that does not have the severe adverse impacts) is included in testing, despite the probability of that scenario being potentially very low.

In effect, this will rule out highways considerations when deciding applications and will undoubtedly result in the unnecessary loss of life.

If the change is not removed, then the least that should be done is the introduction of a set of rules around the scenarios to be tested that will prevent manipulation of the system by applicants.