



HOUGHTON REGIS TOWN COUNCIL
Peel Street, Houghton Regis, Bedfordshire LU5 5EY

Town Mayor: **Cllr Tracey K McMahon** Tel: 01582 708540
Town Clerk: **Clare Evans** E-mail: info@houghtonregis.org.uk

12th October 2020

To: Members of the Planning Committee
Cllrs: D Dixon-Wilkinson (Chairman)
J Carroll, D Jones, M S Kennedy, S Thorne, K Wattingham and Vacancy.

(Copies to all Councillors for information)

Notice of Meeting

You are hereby summoned to a Meeting of the **Planning Committee** to be held at the Council Offices, Peel Street on **Monday 19th October 2020 at 7.00pm.**

This meeting is being held virtually via Microsoft Teams. If members of the public would like to attend, please click on the meeting link below and follow the online instructions:

[MEETING LINK¹](#)

[MEETING GUIDANCE](#)

To assist in the smooth running of the meeting please refer and adhere to the Council's Virtual Meeting Guidance. To view the Virtual Meeting Guidance please click on the link above.

Debbie Marsh
Corporate Services Manager

THIS MEETING MAY BE FILMED/RECORDED²
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Agenda

- 1. APOLOGIES AND SUBSTITUTIONS**
- 2. QUESTIONS FROM THE PUBLIC**

In accordance with approved Standing Orders 1(e)-1(l) Members of the public may make representations, ask questions and give evidence at a meeting which they are entitled to attend in

¹ If you require a meeting link emailed to you, please contact the Head of Democratic Services at louise.senior@houghtonregis.org.uk

² This meeting may be filmed by the Council for subsequent broadcast online and can be viewed at <http://www.houghtonregis.org.uk/minutes>

Phones and other equipment may be used to film, audio record, tweet or blog from this meeting by an individual Council member or a member of the public. The use of images or recordings arising from this is not under the Council's control.

No part of the meeting room is exempt from public filming unless the meeting resolves to go into exempt session.

respect of the business on the agenda.

The total period of time designated for public participation at a meeting shall not exceed 15 minutes and an individual member of the public shall not speak for more than 3 minutes unless directed by the chairman of the meeting.

3. SPECIFIC DECLARATIONS OF INTEREST & REQUESTS FOR DISPENSATIONS

Under the Localism Act 2011 (sections 26-37 and Schedule 4) and in accordance with the Council's Code of Conduct, Members are required to declare any interests which are not currently entered in the member's register of interests or if he/she has not notified the Monitoring Officer of any such interest.

Members are invited to submit any requests for Dispensations for consideration.

4. MINUTES

Pages 6 - 12

To approve the Minutes of the meeting held on the 28th September 2020

Recommendation: To approve the Minutes of the meeting held on 28th September 2020 and for these to be signed by the Chairman.

5. PLANNING MATTERS

Members are advised that, on receipt of a planning application Central Bedfordshire Council will send the Town Council a full set of plans and a copy of the planning application form only. All supporting documents, that have previously been printed and posted, will only be available on their website. Therefore, members are advised that should they require sight of these documents that they request them prior to the meeting.

(a) To consider the following applications:

CB/20/03331/FULL	Form a new dormer to rear of property and conversion of existing garage including the raising of the roof level to form new flat roof 11 Cemetery Road, LU5 5BZ For: Miss M Tavaglione
CB/20/03087/RM	Reserved Matters: following Outline Application CB/15/04918/REG3 (Erection of up to 61,336m ² employment development floor space with associated infrastructure and ancillary works. All matters reserved except means of access from Thorn Road) Appearance, Landscaping, Layout and Scale to Plot B. Land at Thorn Turn, Thorn Road, Houghton Regis LU6 1RT
CB/20/03286/RM	Reserved Matters: following Outline Application CB/12/03613/OUT (5,150 dwellings) for access, appearance, landscaping, layout and scale for provision of class E Foodstore. Land at Sundon Road, Houghton Regis
CB/20/03300/REG3	Erection of a three storey secondary school and sports hall providing 6 forms of entry (900) pupils, together with a 220 pupil sixth form,

- sports pitches including an all-weather pitch, vehicular access, car-parking, coach parking, pedestrian and cycle access from the north and east, landscaping and associated infrastructure.
Kingsland Secondary School Parkside Drive, LU5 5TH
- CB/20/03391/FULL Construction of 9 residential dwellings and all ancillary works
Land at The Orchard, Bedford Road, LU5 6JJ
For: Bilsby Properties Ltd
- CB/20/03406/RM Reserved Matters: following Outline Application CB/12/03613/OUT (Development to comprise: up to 5,150 dwellings and various other classes (retail) (public house) (take away) (offices, industrial and storage and distribution) (hotel) (care home) (community and leisure)): RM sought for appearance, landscaping, layout, and scale of furniture and play equipment.
Houghton Regis North 1, Sundon Road, Houghton Regis
- CB/20/03539/FULL Conversion of the former surgery building to a residential dwelling with outdoor garden space and vehicle parking area
Sewell Manor, Manor Farm, Sewell Lane, Sewell, LU6 1RP
Mr A Buckland
- CB/20/03557/VOC Variation to Condition 12 of Planning Permission CB/19/0323/VOC Variation of Design to keep the ridge level as approved but lower the pitch of the roof to raise the eaves level of the dwellings to alleviate the need for dormers and create small gable on the two storey front projection.
Stable Cottage, Manor Farm, Sewell Lane, Sewell, LU6 1RP
For: JAW Construction
- For noting***
- CB/20/03374/NMA Non-Material Amendment to planning permission CB/19/00883/RM (Reserved matters of appearance, scale and landscaping for residential development of 255 dwellings Following Outline CB/15/0297/OUT): Substitution of house types on plots 167, 168, 169 & 170 from Irwell to Weaver.
Parcels 4a and 4b Bidwell West Houghton Regis Bedfordshire LU5 6JQ
- CB/20/03178/DOC Discharge of Condition 1 from planning permission CB/20/00449/RM (Reserved Matters: following Outline Application CB/12/03613/OUT planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Development to comprise: up to 5,150 dwellings (Use Class C3); up to 202,500 sqm gross of additional development in Use Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1, B2, B8 (offices, industrial and storage and distribution); C1 (hotel), C2 (care home), D1 and D2 (community and leisure); car showroom; data centre; petrol filling station; car parking; primary substation; energy centre; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks;

- engineering operations. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans. Reserved matters planning application for 309 new homes, public open space, landscape and associated infrastructure pursuant to Conditions 3 and 4)
Houghton Regis North 1 (HRN1) Land on the northern edge of Houghton Regis, Houghton Regis
- CB/20/03495/DOC Discharge of Conditions 12 & 14 against Planning Permission CB/19/03232/RM (Reserved matters: Appearance, scale and landscaping for residential development of 336 dwellings on Development Parcels 5a & 5b Bidwell West, Houghton Regis. Outline application (CB/15/0297/OUT) was supported by a full Environmental Statement (ES))
Parcels 5a & 5b, Bidwell West, Houghton Regis, Bedfordshire, LU5 6JQ
- CB/20/03399/DOC Discharge of Condition 5 to planning permission CB/15/00297/OUT (Outline 'hybrid' planning application with details of main access routes, primary road network and associated drainage in detail only and layout in outline with details of landscaping, appearance and scale reserved for later determination. Development to comprise: Up to 1,850 residential (C3) dwellings (including affordable housing), 2FE Primary School (D1), employment land (Use Classes B1 [a-c], B2 & B8), local centre comprising retail (A1, A2, A3, A4 & A5) and community/leisure uses (D1 & D2), layout of public open spaces including sports pitches and changing rooms, natural wildlife areas and all associated works and operations including engineering operations and earthworks)
Land West of Bidwell (Houghton Regis North Site 2) Houghton Regis
- CB/20/03400/DOC Discharge of Condition 20 against planning permission CB/15/00297/OUT (Outline 'hybrid' planning application with details of main access routes, primary road network and associated drainage in detail only and layout in outline with details of landscaping, appearance and scale reserved for later determination. Development to comprise: Up to 1,850 residential (C3) dwellings (including affordable housing), 2FE Primary School (D1), employment land (Use Classes B1 [a-c], B2 & B8), local centre comprising retail (A1, A2, A3, A4 & A5) and community/leisure uses (D1 & D2), layout of public open spaces including sports pitches and changing rooms, natural wildlife areas and all associated works and operations including engineering operations and earthworks)
Land West of Bidwell (Houghton Regis North Site 2), Houghton Regis
- CB/20/03574/DOC Discharge of Condition 19 against planning permission CB/20/00388/RM (Reserved Matters; following outline Application CB/12/03613/OUT Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. 5,150 dwellings (use class C3) 202,500 sqm of

- additional development in Use Classes
A1,A2,A3,A4,A5,B1,B2,B8,C1,C2,D1,D2 All development, works and operations to be in accordance with the Development Parameters Schedule and Plans. Reserves matter for 153 dwellings with access, parking, landscaping and associated works)
Land To The North And East Of Houghton Regis, Sundon Road, Houghton Regis
- CB/20/03576/DOC Discharge of Condition 12 to Planning Permission CB/20/00388/RM (Reserved Matters; following Outline Application CB/12/03613/OUT Outline Planning Permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. 5,150 dwellings(use class C3) 202,500 sqm of additional development in Use Classes A1,A2,A3,A4,A5,B1,B2,B8,C1,C2,D1,D2 All development, works and operations to be in accordance with the Development Parameters Schedule and Plans. Reserves matter for 153 dwellings with access, parking, landscaping and associated works)
Phase 1 Parcel 3 Houghton Regis, North Site 1, Houghton Regis
- CB/20/03553/DOC Discharge of Conditions 3, 6, 7, 8, 10, 11, 12, 13, 14 & 15 to Planning Permission CB/20/00449/RM (Reserved Matters: following Outline Application CB/12/03613/OUT planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Development to comprise: up to 5,150 dwellings (Use Class C3); up to 202,500 sqm gross of additional development in Use Classes: A1, A2, A3 (retail), A4 (public house), A5 (take away); B1, B2, B8 (offices, industrial and storage and distribution); C1 (hotel), C2 (care home), D1 and D2 (community and leisure); car showroom; data centre; petrol filling station; car parking; primary substation; energy centre; and for the laying out of the buildings; routes and open spaces within the development; and all associated works and operations including but not limited to: demolition; earthworks; engineering operations. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans. Reserved matters planning application for 309 new homes, public open space, landscape and associated infrastructure pursuant to Conditions 3 and 4)
Houghton Regis North 1 (HRN1) Land on the northern edge of Houghton Regis, Houghton Regis
- CB/TRE/20/00538 Works to Trees Protected by Tree Preservation Order
SB/80/00004/T4:
Remove decayed large limb of Aesculus Hippocastenum (Horse Chestnut) with weight bias towards Park Road North
Land Adjacent to 80 Tennyson Avenue, LU5 5UG

(b) Decision Notices***Permissions/Approvals/Consents:***

None at time of going to print.

**Houghton Regis Town Council
Planning Committee
28th September 2020 at 7.00pm**

Present: Councillors: D Jones Chairman
J Carroll
Y Farrell Substitute
M S Kennedy
S Thorne

Officers: Clare Evans Corporate Services Manager
Louise Senior Head of Democratic Services

Public: 0

Apologies: Councillors: D Dixon-Wilkinson
K Wattingham

Also present: Councillor: S Goodchild Central Bedfordshire Council

11351 APOLOGIES AND SUBSTITUTIONS

Apologies were received from Councillor Dixon-Wilkinson and Councillor Wattingham (Councillor Farrell substituted)

11352 QUESTIONS FROM THE PUBLIC

None.

11353 SPECIFIC DECLARATIONS OF INTEREST

None.

11354 MINUTES

To approve the Minutes of the meeting held on the 7th September 2020.

Resolved: To approve the Minutes of the meeting held on 7th September 2020 and for these to be signed by the Chairman.

11355 PLANNING MATTERS

(a) The following planning applications were considered:

Non - Delegated

CB/20/03079/FULL Erection of two-bedroom dwelling on the side plot adjoining
71 Churchfield Road
71 Churchfield Road, LU5 5HN
For: Mr S Pointing

Comments:**Objection:**

- 1. The proposed development represents overdevelopment in the area;**
- 2. There is no parking provision contrary to the CBC Parking Regulations;**
- 3. The design is not in keeping with the surrounding area.**

Members requested this application to be called in by Cllr Goodchild.

CB/20/02855/FULL Proposed Side and Rear wrap around extension
67 Grangeway, LU5 5PR
For: Mrs Belzunce

Comments: Houghton Regis Town Council had no objections to this application.

CB/20/02694/FULL Installation of a new fence and gates to the rear of property
7 Woodlands Avenue, LU5 5LJ
For: Mr & Mrs Ward

Comments: Houghton Regis Town Council had no objections to this application, provided that materials are in keeping with the Conservation Area.

CB/20/03131/VOC Variation of Condition 6 to Planning Permission
CB/18/04232/Full (Residential development of 2 No. 4 bedroom dwellings): The position of the bin collection point to change.
4 Bidwell Farm Barns, Bedford Road, LU5 6JS
For: Mr J Dearman

Comments: Houghton Regis Town Council had no objections to this application.

CB/20/03101/FULL Extended driveway with dropped kerb and keep clear hatching
153 Sundon Road, LU5 5NN
For: Mr P Sparkes

Comments: Houghton Regis Town Council had no objections to this application.

CB/20/02953/REG3 Remove existing window and section of brickwork and in its place install new door to match material and finish of window. Create new access ramp with 1:12 gradient and hand rail leading to new door.
For: Regis Education Centre, The Chiltern School

Comments: Houghton Regis Town Council had no objections to this application.

CB/20/03276/FULL Conversion and extension of double garage into a single storey two bedroom detached dwelling, with off street parking and rear private garden
4 Townsend Terrace, Houghton Regis, Dunstable, LU5 5BB
For: Mr T Starkey

Comments: Houghton Regis Town Council had no objections to this application.

The following were noted:

CB/20/03090/NMA Non-Material Amendment to planning permission
CB/19/04208/FULL (Extension to first floor, 2 storey side and rear extension, new double garage and porch)
51 Cemetery Road, LU5 5DA
For: Ms Shepherd

CB/20/03053/DOC Discharge of Condition 19 to Planning Permission
CB/15/00297/OUT (Outline 'hybrid' planning application with details of main access routes, primary road network and associated drainage in detail only and layout in outline with details of landscaping, appearance and scale reserved for later determination. Development to comprise: Up to 1,850 residential (C3) dwellings (including affordable housing), 2FE Primary School (D1), employment land (Use Classes B1 [a-c], B2 & B8), local centre comprising retail (A1, A2, A3, A4 & A5) and community/leisure uses (D1 & D2), layout of public open spaces including sports pitches and changing rooms, natural wildlife areas and all associated works and operations including engineering operations and earthworks)
Land West of Bidwell (Houghton Regis North Site 2)
Houghton Regis

CB/20/03061/DOC Discharge of Conditions 3, 6 and 7 from planning permission
CB/19/03323/VOC (Variation of condition 13 of planning permission CB/17/05378/FULL - Demolition of large mechanical storage unit and abutting dwelling and erection of 4no. semi-detached cottages.)
Manor Farm, Sewell Lane, Sewell, Dunstable, LU6 1RP
Although this was presented for noting, members confirmed their objection to this development.

CB/20/01108/GPDE Prior notification of householder extension: Single storey rear extension
18 Dalling Drive, LU5 5EF.

- CB/20/03120/DOC Discharge of Condition 12 against Planning Permission CB/15/00297/OUT (Outline 'hybrid' planning application with details of main access routes, primary road network and associated drainage in detail only and layout in outline with details of landscaping, appearance and scale reserved for later determination. Development to comprise: Up to 1,850 residential (C3) dwellings (including affordable housing), 2FE Primary School (D1), employment land (Use Classes B1 [a-c], B2 & B8), local centre comprising retail (A1, A2, A3, A4 & A5) and community/leisure uses (D1 & D2), layout of public open spaces including sports pitches and changing rooms, natural wildlife areas and all associated works and operations including engineering operations and earthworks)
Land West of Bidwell (Houghton Regis North Site 2)
Houghton Regis
- CB/20/03201/DOC Discharge of Condition 13 to Planning Permission CB/15/00297/OUT (Outline 'hybrid' planning application with details of main access routes, primary road network and associated drainage in detail only and layout in outline with details of landscaping, appearance and scale reserved for later determination. Development to comprise: Up to 1,850 residential (C3) dwellings (including affordable housing), 2FE Primary School (D1), employment land (Use Classes B1 , B2 & B8), local centre comprising retail (A1, A2, A3, A4 & A5) and community/leisure uses (D1 & D2), layout of public open spaces including sports pitches and changing rooms, natural wildlife areas and all associated works and operations including engineering operations and earthworks)
Land West of Bidwell (Houghton Regis North Site 2)
Houghton Regis
- CB/20/03203/DOC Discharge of Condition 7 to Planning Permission CB/15/00297/OUT (Outline 'hybrid' planning application with details of main access routes, primary road network and associated drainage in detail only and layout in outline with details of landscaping, appearance and scale reserved for later determination. Development to comprise: Up to 1,850 residential (C3) dwellings (including affordable housing), 2FE Primary School (D1), employment land (Use Classes B1 , B2 & B8), local centre comprising retail (A1, A2, A3, A4 & A5) and community/leisure uses (D1 & D2), layout of public open spaces including sports pitches and changing rooms, natural wildlife areas and all associated works and operations including engineering operations and earthworks)
Land West of Bidwell (Houghton Regis North Site 2)
Houghton Regis

(b) Decision Notices

Permissions/Approvals/Consents:

None at time of going to print.

Refusals:

None at time of going to print.

Withdrawals:

None at time of going to print.

11356 INCOME AND EXPENDITURE REPORT

Members received an income and expenditure report on the Planning Committees budget.

Resolved: **To note the report**

11357 MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT (PLANNING CONSULTATIONS)

The Ministry of Housing, Communities and Local Government had issued three consultations on reform of the planning system:

1. Changes to the current planning system (NALC deadline for responses 17.9.20 (MHCLG deadline 1.10.20)
2. Planning for the future - the planning white paper (NALC deadline for responses 15.10.20) (MHCLG deadline 29.10.20)
3. Transparency and competition: a call for evidence on data on land control (NALC deadline for responses 16th October) (MHCLG deadline 29.10.20)

Members had previously been provided with briefings corresponding to each consultation and the corresponding deadlines for each consultation. The NALC deadlines were earlier than MHCLG's, so that the Town Councils views could inform NALC's responses to MHCLG on behalf of the sector.

Members considered these briefings at the previous meeting and requested that the Town Council's planning consultant provide members with a report that would help inform the Town Councils response.

It was agreed that the Town Council would respond directly to MHCLG and copy NALC into their response to the changes to the current planning system consultation, as the NALC deadline had passed. NALC had been advised and have confirmed that they will expect to read the Town Councils response in due course. For the other two consultations, the Town Council will respond to NALC only.

Members were reminded that this item was deferred from the last meeting.

Resolved: **To confirm the Town Councils response to the Ministry of Housing, Communities and Local Government Planning Consultations in accordance with the briefing report prepared by the town council's planning consultant.**

11358 STRATEGIC DEVELOPMENT SITES/LOCAL PLAN– UPDATE/PROGRESS

Woodside Link – No substantive update to report.

A5 M1 Link – No substantive update to report.

All Saints View – No substantive update to report.

Linnere – No substantive update to report.

Bidwell West – No substantive update to report.

Kingsland – No substantive update to report.

Windsor Drive – No substantive update to report.

Section 106 Monies – No substantive update to report.

Local Plan Consultation – Central Bedfordshire Council had been advised that the recent Local Plan consultation, had closed. The consultation ran for eight weeks from 18th June to 12th August and related to additional evidence published by the Council to address questions raised by the Planning Inspectors in their letter of 30th September (EXAM 69).

In total 466 responses were received.

The responses had been submitted to the Planning Inspectors. Inspectors will consider the responses before advising on what the next steps will be. It was anticipated they would wish to hold further hearing sessions later in 2020.

Resolved: To note the information

The Chairman declared the meeting closed at 8.29pm

Dated this 19th day of October 2020

Chairman

28 SEPTEMBER 2020

PR 10-20 | CHANGES TO THE CURRENT PLANNING SYSTEM

I am writing in response to the Ministry of Housing, Communities and Local Government (MHCLG) 'Changes to the current planning system' consultation.

The National Association of Local Councils (NALC) is the nationally recognised membership and support organisation representing the interests of around 10,000 parish and town councils and many parish meetings in England, 70% of which are situated in rural areas. Local (parish and town) councils are the backbone of our democracy and closest to local people, providing our neighbourhoods, villages, towns and small cities with a democratic voice and structure for taking action, contributing in excess of £2 billion of community investment to supporting and improving local communities and delivering neighbourhood level services.

Executive summary

- ◁ NALC agrees with the government that the planning system could be improved and should have more emphasis on building design, (we endorse the recommendations in the report 'Living with beauty' published by the Building Better, Building Beautiful Commission: (<https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission>) .
- ◁ However, NALC urges MHCLG to re-think the changes it has proposed in the Planning White Paper and in 'Changes to the Current Planning System'. The changes would result in a democratic deficit and less community involvement and would not tackle the key issue slowing down the delivery of more housing that was identified by Sir Oliver Letwin in his report 'Independent Review of Build Out' which he presented to parliament in October 2018 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752124/Letwin_review_web_version.pdf).
- ◁ Sir Oliver Letwin identified that the key problem was the market absorption rate (i.e. the rate at which builders were prepared to deliver homes which would ensure their market price in any given local area was not affected in an adverse manner). Sir Oliver, whose report was commissioned by the chancellor of the exchequer, expressed support for master planning (which is not mentioned in the current consultation documents) and the use of Section 106 agreements (which, it is proposed, should be dropped, despite these agreements having delivered significant affordable housing). Master planning

is eminently sensible and 106 agreements have been very successful in delivering affordable housing.

- ◀ Whilst the narrative in the two consultation documents says much about having a planning system that is fit for purpose, inclusive and which improves public trust, the proposals come on top of a significant extension to permitted development rights and they:
 - Dictate the amount of housing each Local Planning Authority (LPA) has to deliver, based on an algorithm geared to delivering over 300,000 housing units per year – despite a lack of verisimilitude for that over-arching figure and despite falling population projections.
 - Require LPAs to divide all land into one of three (or possibly only two) zones, ensuring that the two development zones ('Growth' and 'Renewal') together are large enough to accommodate the housing they have been instructed centrally to supply, thereby forcing the LPAs to not place land in the 'Protected' zone which would be worthy of being there.
 - Allow only 30 months for the evolution of and consultation on Local Plans and thereafter remove from principal authorities the right to decide on planning applications on a case by case basis and the right of local councils to comment upon them.
 - Abolish Sustainability Appraisals and question the value of the 'Duty to Co-operate' between neighbouring local authorities and Strategic Environmental Assessments.
 - Do nothing to strengthen Neighbourhood Plans and stop them from being overturned when principal authorities cannot meet housing delivery numbers or any land tests that may apply and do not tackle the community capacity problem if they have to be reviewed five yearly.
 - Do not recommend that a percentage of the income to LPAs from developers is automatically distributed via local councils for the benefit of their local communities.
 - Do not align with the climate change agenda (NALC has declared a climate emergency).

Consultation questions

NALC's responses to the consultation questions are as follows:

1. Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?

No. There are any number of pitfalls in adopting a standard methodology for complex planning issues. The proposed approach for generating housing numbers of taking three disparate baselines – existing stock levels, household projections and affordability ratios – appears to have been devised in order to arrive at a national headline housing figure of over 300,000 per year. But the intention is to only abide by the housing projection figures so long as they produce a figure of 300,000 or above. If they do not, they are to be dismissed as not robust.

From our perspective, developers (as the Local Government Association recently confirmed), have been given 1 million planning permissions in the last ten years which still have not been built out – so a focus should be given to rectifying that first. Local communities will feel aggrieved if they are required to surrender more land for development when existing planning permissions have not been delivered.

NALC is calling on the MHCLG to establish a housing delivery test focused on developers which requires them to build out sites for which they have planning permission - rather than allowing a punitive system which punishes local authority areas for not meeting either artificially high housing delivery numbers (or their five-year housing land supply if this measure is in fact retained) and which forces them to accept even more development.

We doubt that the government will be able to deliver on its commitment in the White Paper to build 337,000 new homes. The government should revise its aspirations to ensure they are based on the latest ONS population figures. We would point out that since 2014 ONS household projections have declined significantly whilst the government's target has escalated. We concur that more homes are needed and that there is a dire shortage of affordable homes but we cannot support the government's contention that the country requires 300,000 homes plus every year.

2. In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

No. There are undoubtedly issues around both the baselines and the headline figure. For instance, a statement in paragraph 20 maintains that diverse housing needs are taken into account. But it is not possible to find a basis for this statement. Meanwhile, the headline figure (of 300,000 or 337,000) appears to NALC to be more or less a fixed entity, despite the fact that the ONS population figures have declined since 2014 and irrespective of future variations in population predictions or any other relevant factors which may emerge. With all the

variables that actually exist, it would be very difficult to support any standard methodology but it is not possible to support this one which does not withstand serious scrutiny.

The figure of 300,000 houses per year nationally is approximately 1.2% of national stock. Consequently, many areas would have to contribute well in excess of 0.5%. Also, the proposed new methodology does not only fail to focus development on urban areas but directs it to areas which are less sustainable and where housing is more expensive.

We also think that the requirement in the National Planning Policy Framework (NPPF) for a five year land supply for housing - needs to be amended and clarified in a way which prevents developers riding roughshod over Local Plans, contrary to the wishes of local communities, endorsed planning policies and emerging and 'made' Neighbourhood Plans. We agree with the Kent Association of Local Councils that the government should amend the 300,000 target for new dwellings as ONS population figures become available. Housing allocation across authorities is fundamental and should be agreed regionally for that reason.

3. Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

No, on balance. The idea of trying to second guess how the economy will react in future, particularly after COVID 19, is deeply flawed, as old methods of housing need assessment will go out of the window with more and more people working from home. We would like the government to reverse the negative impact on the availability of affordable social housing caused by factors such as the reduced contribution to Housing Associations and a failure to make use of empty properties that could be used for housing for local people.

4. Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

No. See position in response to Q.3. Also, local councils (e.g. Newport Pagnell) are telling us that such approaches may not last forever as it is not possible to predict yet what the impacts on house building from COVID 19 will be. We see this as an attempt to smooth calculation using trends, but we have the same concerns as for question 3. In our view, the proposed methodology would do little to address affordability. It merely places a lot of pressure on high value

areas where developers would restrict their build-out rates in order to keep property values high. The demand for affordable housing would not be met.

5. Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

No. NALC supports the linking of housing need calculations to affordability but it is unable to concur with any of these three propositions or with the proposition that the housing figures which emanate from the proposed new methodology should become mandatory. The affordability formula put forward has the effect of directing the biggest increase in housing numbers to areas of high demand and high housing prices. Whilst this might improve the amount of land that is made available, it will not improve the delivery of housing.

Builders will not build out at a rate which would affect the prices they can achieve. (Oliver Letwin's 2018 review of build out rates explained that builders work to a 'market absorption rate', only constructing new homes at a pace which the local market can stand without materially affecting the market price). The need is to boost the supply of affordable tenures, not the supply as a whole. The other point that NALC would make here is that less affordable housing would be delivered if the government went ahead with the idea of exempting developments of fewer than 40 or 50 homes from having to pay the proposed new levy. See again our answer to question 3. But, for the future, MHCLG needs to consider the following factors when assessing housing need:

The real issues are where is new industry that requires close proximity to the workplace to be built?

Where will tax break incentives for this to happen take place?

How much of retail sales will move to online sales, where warehousing and logistics become far more important than proximity of people to a central shopping area?

6. Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of:

Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination?

On balance, no. Whilst this strikes an appropriate balance between the needs of those planning authorities not already at the second stage of the strategic plan consultation process and those which are - the government must ensure that Local Planning Authorities (LPAs) can only rely on accountable and transparent evidence of housing need which they are obliged to share with local councils progressing Neighbourhood Plans. This would ensure that a failure to do so should result in the new Infrastructure Levy (IL) being payable as if relevant councils had adopted a Neighbourhood Plan. Government should be undertaking research into these questions, both to kick-start the economy and to prepare for what will be a new housing market in the future with no basis on old standard methods of assessing housing needs, that were always at best, nothing more than a guess based on past experience.

7. Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate?

We do not agree. There is an element of unreality to these suggested transitional timescales. If the new methodology results in a significant change (upwards or downwards) to a local authority's housing figures, obviously, it is going to affect their need for development sites. There could also be wider impacts on other parts of the Local Plan. Are these adjustments supposed to be made without collecting further evidence and without further consultation? Certainly, the time frames proposed do not allow for either.

If not, please explain why. Are there particular circumstances which need to be catered for?

See our answer to question 6.

8. The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):

- i) **Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.**
- ii) **Negotiation between a local authority and developer.**

iii) Other (please specify)

NALC does not feel able to endorse these proposals because they do not deal with the need for a range of different types of tenures to be available. These proposals are linked to the government's (apparently exclusive) commitment to home ownership as the preferred tenure despite the evidence that facilitating home ownership does not improve affordability. Shelter demonstrated in 2015 that the 'Help to Buy' scheme had added over £8,000 to the average house price and that those 'helped to buy' were able to do so at the expense of worsening the affordability situation for everyone else.

We agree with the Kent Association of Local Councils that affordable housing targets should be re-assessed and re-aggregated from a county to a regional perspective. We think that key to all housing development is the delivery of required infrastructure. GP surgeries, roads and schools should be built ahead of new housing developments – according to the government's own manifesto priorities. We also think that climate change factors and health and wellbeing factors for residents should also be considered when affordable housing targets are set. We think this also depends on existing need and demand.

9. Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to this First Homes requirement?

No (the 'Changes to the current planning system' document does not appear to contain the relevant information necessary to answer this question fully). There should be a clear policy uncluttered by conditions giving ways out. One would expect the local authority to have all the facts to ensure they meet local needs for First Homes and not be governed by exemptions which could lead to fewer First Homes becoming available.

10. Are any existing exemptions not required? If not, please set out which exemptions and why.

No (the 'Changes to the current planning system' document does not appear to contain the relevant information necessary to answer this question fully). Exemptions tend to cause confusion. The Local and Neighbourhood Plans should already have dictated the number and tenure mix required.

11. Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.

No (the 'Changes to the current planning system' document does not appear to contain the relevant information necessary to answer this question fully). Further exemptions would add to the confusion. The definition of key workers needs to be clearly thought about. From a local council perspective there are key workers too, working in leisure, parks, play areas, cemeteries, etc.

12. Do you agree with the proposed approach to transitional arrangements set out above?

More detailed clarification is required around the proposed transitional arrangements. For instance, what would happen to a Local Plan submitted now? Neighbourhood Plans must reflect Local Plans. If a Local Plan is in a Regulation 19 phase - and MHCLG gives 6 months for aligning it to new proposals, the Neighbourhood Plan that must relate to the Local Plan will not be at Regulation 19 stage-equivalent, and so should be given longer (say 1 year) to bring the Plan in line. We are also asking MHCLG to expressly set out the relationship that will exist between neighbourhood plans and any new types of future spatial plans.

13. Do you agree with the proposed approach to different levels of discount?

It is apparent that very high levels of discount would be required in some areas in order to bring house prices to an affordable level. This prompts the question, should significant sums be invested in this way - or would some of the money be better spent enabling affordable rented properties and / or socially rented ones? NALC also asks MHCLG to reconsider its decision to require local authorities to review their Local Plans every 5 years as this means that neighbourhood plans also have to be reviewed with the same frequency. There are capacity issues related to both types of spatial plans and, in any event, a longer period of currency would bring with it more certainty.

14. Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?

No, on balance. A mix of homes (market and affordable) seems to work well and MHCLG have imposed constraints to ensure that is the way forward by insisting on a percentage of a development being affordable etc. Allowing for the ratio of affordable to market to be reversed in this way does not seem well thought through. We are also asking for the mandatory provision of protection for parishes from speculative development during the creation of Neighbourhood Plans and greater certainty that 'made' plans will be upheld.

15. Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?

No. Any new development must, by necessity, be proportionate to the existing settlement which suggests a size limit is required. Paragraph 64 says First Home Exception Sites are small sites brought forward outside the Local Plan. MHCLG cannot refer to 'small' and then leave, undefined, what is meant by the word. The size limit should be retained. Government should change the National Planning Policy Framework (NPPF) so that local councils (and Neighbourhood Planning bodies) have the same right as promoters / developers to appeal planning decisions. Developments must have a proportion of affordable housing.

16. Do you agree that the First Homes exception sites policy should not apply in designated rural areas?

In the first instance, clarification is needed as to what constitute 'designated rural areas'. Communities need to understand whether they are in a designated area or not and how they would be affected. Clarification is also needed as to how exception sites would be treated within the different zones proposed in the Planning White Paper. It is understood, however, that the proposals change how exception sites would be used. Up to now, the purpose of exception sites has been to enable the provision of affordable housing by using sites that would not otherwise have achieved planning consent. But the proposal in 'Changes to the current planning system' is that small sites can be promoted outside the Local Plan for First Homes - but not for other tenures. Studies have shown that building owner-occupied housing in an area tends to cause prices to rise - and quite rapidly. Hence housing in that area quickly becomes unaffordable. There needs to be an exclusion of the Right to Buy extension to housing in rural areas and, where this is not possible, for priority to be given to land already pre-allocated by LPAs for local need.

17. Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?

Only if the LPA thinks so after consultation with affected local councils. We applaud the desire to help small businesses to recover, but this approach is not right for rural areas. Furthermore there is no telling how long the COVID restrictions and their impact will last. Smaller sites making a contribution to affordable housing are more acceptable to rural communities than larger ones. Other ways of supporting SME builders with their cashflow should be considered such as subsidised loans, VAT exemption for a specified period, tax breaks. It is important not to trade off help for SMEs with a reduction in supply of affordable homes. The government should give local councils the freedom to spend what should be a statutorily fixed share of Infrastructure Levy monies (developers'

contributions) on leisure and recreation facilities – or other community facilities – as they judge to be necessary.

18. What is the appropriate level of small sites threshold? i) Up to 40 homes ii) Up to 50 homes iii) Other (please specify)

Other – see 16. We need much more affordable housing, not less. It has been estimated that if SMEs were allowed to completely forego affordable housing provision for sites of up to 50 units, it would lead to a reduction of affordable housing of between 10% and 20%. A far better way to secure employment for small builders is to make it a requirement of large build sites that a percentage of the available land is sold off to small builders, at a ‘reasonable price’ that does not see huge margins on original cost of site. However, we agree with the Kent Association of Local Councils that, as matters currently stand, authorities have to maintain a 5 year housing land supply and maintain a retrospective housing delivery test and - on the ground - the two are not compatible.

19. Do you agree with the proposed approach to the site size threshold?

No. Local councils should be legally consulted on site size threshold up to 40 homes – see 16. Our view is that land banking is one of the major reasons for lack of home building, be this by developer or land ownership, and we accept that both are occurring.

20. Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?

No, on balance. Developers of large sites are taking an unnecessarily long time to build, as developers like to hold their price levels by building no more than 100 homes per year. Any new planning system should robustly counteract that by insisting that a major development site (anything over 50 homes) must be completed (not just started) no less than 3 years from the date of detailed planning application. This would ensure major developers work collaboratively with minor builders to get many more workers onto site at the same time, and would have the beneficial effect of reducing house prices.

21. Do you agree with the proposed approach to minimising threshold effects?

No. Forty or fifty homes on one site in a small rural community is a lot and could change the character of that community. Proportionality should be a factor if this idea is introduced. Also, it has to be said that short term economic boosts for

specific sectors historically only tend to be effective for as long as the initiative lasts.

22. Do you agree with the Government's proposed approach to setting thresholds in rural areas?

NALC would repeat here a point it made earlier in this consultation response and that is that circumstances vary around the country and even within local authority areas. Consequently, it would be better to leave this matter to each LPA. Also, communities preparing neighbourhood plans need a 'breathing space' in which to plan and national planning policy and guidance must explicitly recognise this.

23. Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?

Yes – by engaging with local councils and LPAs on housing sites and allocations through neighbourhood plans. The government should be examining ways to help local authorities to deliver social housing. MHCLG must be aware that the ability for a community to shape its area through neighbourhood planning is an important part of the social role of planning. Methods of collaboration between major and minor builders can vary from a straight supply and demand agreement to purchase of land subject to conditions of build. No planning applications on adjoining sites that could share a common build should be allowed to come forward in piecemeal ways.

24. Do you agree that the new Permission in Principle should remove the restriction on major development?

No, on balance. This should be optional for LPAs to decide whether it is appropriate case by case to remove such restrictions. Communities should always be consulted where major developments are concerned. The detailed planning stage is where the average person and Neighbourhood Plans can have the most influence.

25. Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.

Yes, on balance. A limit should be imposed and communities (including local councils) should be consulted on the size of commercial development as needed – especially in rural areas.

26. Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?

Yes. But more information is needed when consulting local councils. Without this phase important contributions to landscaping, amenities, nature of schooling, community centres, public open space and all the other very important issues for residents are ignored. These items are only touched on very briefly during the outline planning phase, so the detailed planning phase is required to ensure that places are built which people want to live in.

27. Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.

Yes. A ceiling should be set for the number of storeys a building can be built to and local councils / the community should be consulted on heights during the application process. There should also be a requirement when submitting planning applications that all plans should have dimensions for all proposed buildings, including the height above ground level, and the distance from the plot boundary. This also depends on the local character of the area.

28. Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be:

- i) required to publish a notice in a local newspaper?
- ii) subject to a general requirement to publicise the application or
- iii) both?
- iv) Disagree

Both. The more publicity local councils have access to for permission in principle applications for large developments, the better.

29. [REDACTED]