

## **The Standard Method for Calculating Housing Numbers in Strategic Plans**

**Q1: 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?**

We do not agree with either measure. To use a fixed percentage of the existing stock is arbitrary. The existing stock is the result of past history and there is no reason why it should be a good guide to future need. To use the latest household projections means that an authority that has shown above average growth in last the ten years will be required to do so in future regardless of why this growth has occurred. In the case of our local authority, Wychavon, this growth has been the result of the adoption of a new local plan, the South Worcestershire Development Plan (SWDP) following a period when some major speculative planning proposals were allowed on appeal because there was not a five year housing land supply. The plan allocates housing to 2030 but much of what is designated has already been delivered. As a consequence of this catching-up exercise 6909 dwellings have been built in the last eight years against a requirement of 3874. Wychavon now has a 9.98 year housing land supply in its rural area. However the increase in housing numbers does not seem to have increased the affordability of houses for local people.- see below.

The SWDP is now being reviewed using the government's existing Standard Method for calculating housing numbers and extending the plan period to 2041. This review, which gives an increase of 6% over the annual housing requirement in the original SWDP, is already increasing the pressure on our towns and villages and will require two new settlements in the district (plus a further one on our boundary to accommodate the needs of Tewkesbury Borough). To apply the new algorithm, which also includes an affordability component, to Wychavon would result in a near tripling of what is currently being planned for each year in the revised SWDP and would be totally unacceptable.

However it is not only districts such as Wychavon which would be set entirely the wrong housing targets. Because the algorithm reflects housing demand rather than need it also has consequences for relatively poor off areas e.g. Stoke-on-Trent where the housing market is weak reflecting low demand but not necessarily low housing need.

**Q2: 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.**

We do not agree that the stock element is appropriate – see above.

**Q3: 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.**

Yes, although we do not believe that increasing the supply of market housing is the best way to provide affordable houses to rent.

**Q4: 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 above.

**Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.**

We have already said that we believe an increase of supply as a means of making houses more affordable is mistaken. It is unrealistic to see developers or existing homeowners accepting a sufficiently substantial fall in the prices of existing houses to make new ones sufficiently affordable for the least well off. We have not seen an increase of affordability as a result of the rapid increase of housing provision in Wychavon. It is much better to provide affordable housing to rent directly rather than by operating on the overall housing supply.

**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:**

**Q6: 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?**

**Q7: 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?**

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

We are not clear whether the South Worcestershire Authorities would be able to meet the timetable in Question 7 but given the delay caused by Covid 19 it seems unlikely. Unless they are given sufficient leeway to finish the revision of the SWDP which started in 2017 and was on the point of being finally consulted on this autumn there will be chaos and major developments will be seriously delayed.

**First Homes**

**Q8: 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)

Other. As we have already indicated above we believe that the most acute need in villages such as ours is the provision of houses to rent.

**With regards to current exemptions from delivery of affordable home ownership products:**

**Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?**

No

**Q10: Are any existing exemptions not required? If not, please set out which exemptions and why.**

No

**Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views.**

No

**Q12: Do you agree with the proposed approach to transitional arrangements set out above?**

We need the transitional arrangements to be such that the work involved in the current SWDP Review and developing Neighbourhood Plans is not wasted.

**Q13: Do you agree with the proposed approach to different levels of discount?**

The Parish Council does not have a view on this, except to say that local authorities should be free to decide these matters locally.

**Q14: 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?**

Kemerton is a designated rural area where delivery will be through the Rural Exception Sites policy – see Q16 below. Therefore we do not have a view.

**Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?**

No.

**Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas?**

Yes

**Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?**

No

**Q18: What is the appropriate level of small sites threshold?**

- i) Up to 40 homes
- ii) Up to 50 homes
- iii) Other (please specify)

Other. It is up to Local Authorities to set their own thresholds. Village sites will typically be much lower than 40 homes.

**Q19: Do you agree with the proposed approach to the site size threshold?**

No certainly not. It is most important that we can provide affordable houses in villages such as Kemerton, and this would not be likely to happen with the new national threshold.

**Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months?**

We do not believe in the national threshold at all.

**Q21: Do you agree with the proposed approach to minimising threshold effects?**

We are not qualified to judge how effective these would be.

**Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas?**

What about rural areas that are not Designated Rural Areas such as market towns.

**Q23: Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period?**

Through grants or loans. These could be to Housing Associations or Local Authorities who employ SME builders to do the work.

Extension of the Permission in Principle Regime

**Q24: Do you agree that the new Permission in Principle should remove the restriction on major development?**

No.

**Q25: 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.**

Not qualified to answer

**Q26: 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?**

No we do not believe major developments can be dealt with by Permission in Principle

**Q27: Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.**

Not qualified to answer.

**Q28: 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

**If you disagree, please state your reasons.**

We do not agree that Permission in Principle should be allowed for large developments. If however our view is not supported then we would expect the local authorities to give the widest possible publicity including advertisements in local papers but also consultation with local parish councils and affected residents.

**Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectarage, with a maximum fee cap?**

We are not qualified to answer. It seems likely that a flat fee per hectare will not necessarily reflect the quantity of work that the planning authority is required to carry out.

**Q30: What level of flat fee do you consider appropriate, and why?**

We are not qualified to answer

**Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why.**

Yes

**Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders.**

More training for Parish Councils on this would be most helpful. It is most important that they have a say in granting this permission.

**Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome?**

We do not consider that the scheme would produce any benefits. Unless the same degree of information is given to Parish Councils there will be a sense of local resentment and lack of democracy.

**Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible.**

We are not qualified to answer.

**Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty?**

**If so, please specify the proposal and explain the impact. If there is an impact – are there any actions which the department could take to mitigate that impact?**

We find this difficult to answer but it does not seem that the aim of advancing equality of opportunity is met unless there is more affordable housing to let in rural areas. The changes seem to focus on private house ownership which will not be available to the poorest members of our village communities.