



# The countryside charity Kent

## **Changes to the Current Planning System**

### **Response to Consultation by CPRE Kent**

**September 2020**

CPRE Kent is the largest of the individual branches of the CPRE Network, representing some 2,250 members, of whom over 180 are Parish Councils or amenity associations.

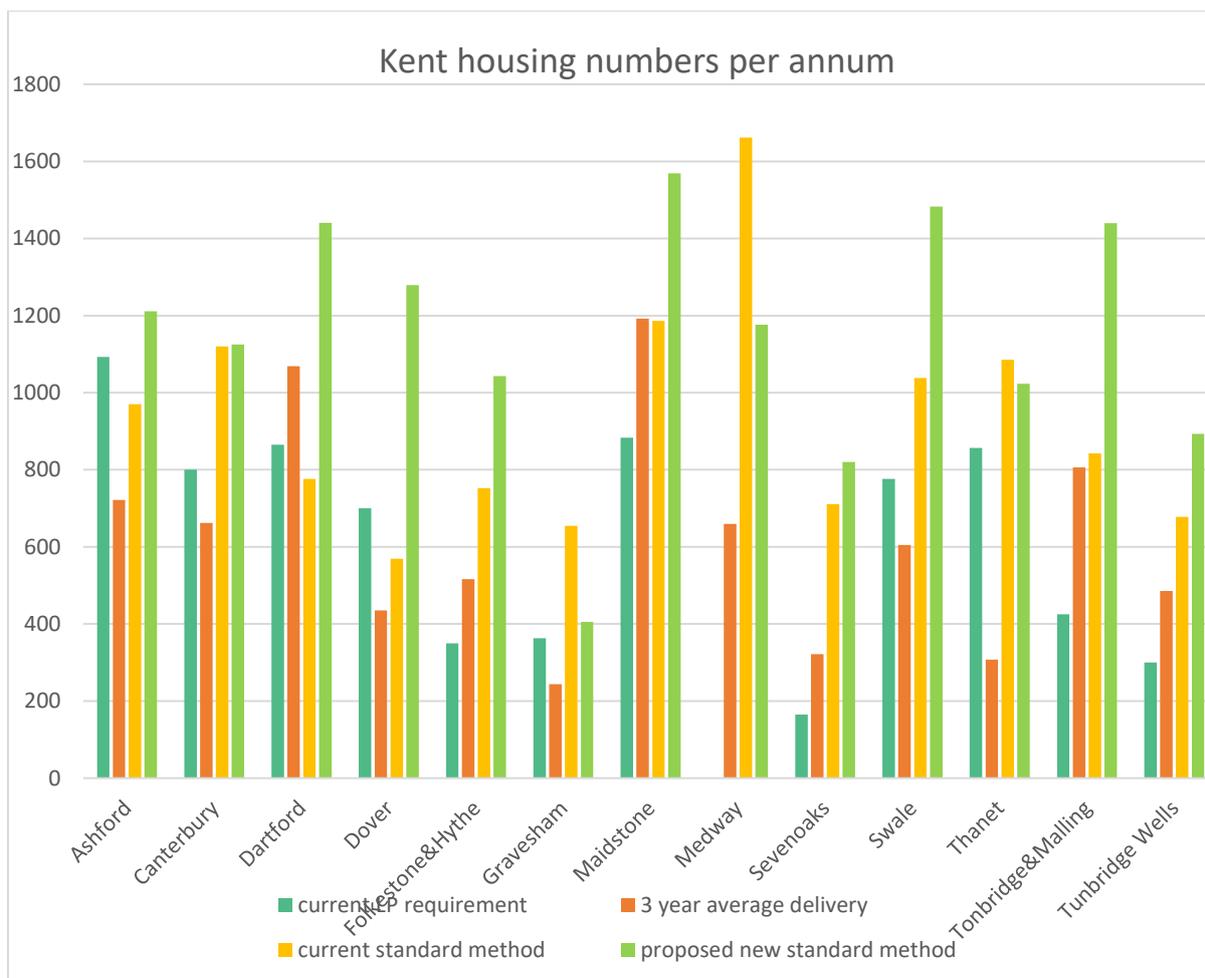
CPRE Kent fully supports the “OneCPRE” Response to this consultation and wishes to make the following additional comments, from the perspective of the effect of the proposals set out in this consultation document on the Kent countryside, an effect which we believe would be severely detrimental.

#### **Proposed revision to the current method for assessing local housing need: Questions 1 to 7**

**Overall Answer:** We agree with the OneCPRE Response. We do not consider that the current method represents anything approaching an objective assessment of local housing need. It is already simply a means of seeking to deliver the government’s housebuilding target for the time being, having ceased some time ago to be based upon up-to-date Office for National Statistics (ONS) statistical projections of household formation. Even ONS data represents no more than a projection of estimated demand and has little to do with local housing need. The existing method and the levers by which it is imposed on local planning authorities (LPAs) are already driving housing development to unsustainable levels in many parts of England, to the detriment of the countryside.

This is demonstrably already the case in Kent, where local plans are already regularly allocating land for major development in the two Areas of Outstanding Natural Beauty (AONBs) in Kent (the North Downs AONB and High Weald AONB) and in the London Metropolitan Green Belt, something that under the NPPF should only happen in exceptional circumstances. Furthermore, the frequent changes to the method of calculating housing need over recent years have often placed LPAs in Kent in the position of being unable to demonstrate a five-year housing land supply. This has led to speculative developments in the countryside, outside the parameters of local plans and sometimes in protected areas, being approved. We believe that these problems are experienced similarly in other counties in the South East.

The revised method will only make this situation worse, as the bar chart below demonstrates:



Despite the environmental harm which the current method is causing, it falls far short of delivering the government’s current housing target of 300,000 new homes per annum. The reason is not the lack of land allocated for housing or the rate at which planning permissions are granted by LPAs, as the rapidly rising stock of unbuilt planning permissions demonstrates. It is simply that the profit-maximising rate of housebuilding in current market circumstance is far less than this and the imposition of higher housing targets on LPAs will not alter this, nor will any other measures proposed in this consultation. Centralised housing targets are not the answer. A more useful measure would be to incentivise the industry to build out the one million unbuilt permitted homes around the country, before any more development land need be allocated.

CPRE Kent believes, of course, that everyone living in our County should be decently housed, in well-designed homes suitable for their needs, but housebuilding cannot be an overriding policy consideration. The one overriding long-term policy consideration in today’s world is the protection of the environment: to mitigate climate change, protect food supply, enhance the health and wellbeing of our population and preserve the natural beauty and cultural heritage of this Nation and this County.

## **Questions 1 and 2**

### **Answer: No**

Existing housing stock is an irrelevant consideration in the calculation of housing need. It takes no account of the capacity for sustainable new housebuilding in any given area. It perversely increases housing targets in areas in which most homes have recently been built. Local housing need can only be determined by LPAs, who are in possession of all the relevant information about the communities in their areas.

A vital consideration, wholly absent from the current and proposed formulas, is the environmental capacity of an area to support a larger population. In Kent there are many constraints on allocating more land for housing, which are there to prevent harm to the environment and unsustainable developments. They include, but are not means limited to, protected areas and landscapes such as AONBs, Green Belt, Conservation Areas and other heritage assets, Sites of Special Scientific Interest (SSSIs), nature reserves, and the settings of such areas and assets, flood plains, valuable landscape areas, water supply and sewerage issues and the need to protect productive agricultural land. All these considerations need to be factored into the housebuilding target for any area and are best assessed locally, by the relevant LPA.

## **Questions 3, 4 and 5**

### **Answer: No**

The use of affordability in the current method already drives LPAs towards allocating land for unsustainable and environmentally damaging levels of housing development in those parts of Kent where prices are relatively high. The proposed changes will only make this situation worse. Small and medium-sized towns and rural villages, full of character and with thriving local communities, abound in Kent. Most are within commuting distance of London. Such places are naturally attractive places to live and will always be in demand, not only from those working in the County, but also from those working in London on high incomes and those wishing to retire to the County. Their very attractiveness makes it inevitable that they will command higher house prices. Large scale housebuilding in such areas would destroy the very characteristics that make them attractive places to live and cause incalculable environmental harm, without producing a remotely countervailing benefit in reduced house prices.

The nature of the demand for housing in Kent, coming as it does in part from those earning elevated Central London salaries, or retiring on pensions and savings from such earnings, makes the ratio in Question 1 a distorted measure of affordability.

What Kent needs (in common with other parts of the country) is more truly affordable housing, in both urban and rural areas, built on brownfield and other sustainable sites which do not harm the environment, to meet the housing needs of local people whose incomes and savings do not, and in many cases never will, allow them to buy their own homes.

## **Questions 6 and 7**

### **Answer: For LPAs to answer**

While we feel that LPAs are best-placed to answer these questions, we would emphasise two considerations. The first is that a vast amount of work is invested in local plans by local authorities and by communities, in all their manifestations, over an extended period, in an attempt to come to the best solution for the future development of their areas. This work should not be wasted. Local plans which have been consulted on by the LPA should be allowed to proceed through to adoption, judged on current planning criteria. The second is that neither LPAs nor communities have the capacity for repeated local plan-making at short intervals and both communities and developers are entitled to a reasonably long period of relative certainty, once a local plan has been adopted. Local plans adopted under current planning criteria should be allowed to run their normal course, irrespective of the changes now proposed.

## **First Homes; Questions 8 to 16**

**Answer:** We agree with the OneCPRE Response.

First Homes may be an appropriate tool for delivering some more affordable housing in Kent, but neither First Homes, nor any combination of affordable housing arrangements based on home ownership, can be a complete answer to the needs of those who cannot afford to buy a home and whose needs must be met by social housing, built or funded ultimately by national or local government, however it is delivered. We therefore do not think that First Homes should predominate on exception sites or rural exception sites.

## **Supporting Small and Medium-Sized Developers; Questions 17 to 23**

**Answer:** We agree with the OneCPRE Response.

While the encouragement of SME builders is desirable, in the interests of competition and good quality housebuilding, it is not appropriate to incentivise smaller builders at the expense of the provision of affordable rural housing. Smaller developments, chiefly on rural exception sites, are often the principal means by which truly affordable housing for local people is provided in rural villages. This is certainly the case in Kent. There should be no lower threshold for the provision of affordable housing in designated rural areas, and in other rural areas the current threshold of 10 units should not be raised. A more constructive measure to encourage smaller builders would be a government-funded training scheme to equip firms to build homes to the highest environmental standards, which few are able to do at present.

## **Extension of the Permission in Principle Consent Regime; Questions 25 to 34**

**Answer:** We agree with the OneCPRE Response. Extending the permission in principle regime would add new complications to an already complex planning system, take important decisions about major housing developments out of the hands of elected democratic bodies and reduce the information base which can be provided by the local community. It will reduce local involvement in the Planning Process. LPAs and local

communities are best able to judge how the places they live in should develop. The existing system gives LPAs and communities appropriate roles in the planning of major housing developments and the proposed change would be counterproductive.

**Public Sector Equality Duty; Question 35**

**Answer:** We agree with the OneCPRE Response

Draft 2: 30/9/20

JPW