

Response to DCLG 'Planning for the right homes in the right places: consultation proposals' on behalf of St Albans City & District Council

Thank you for the opportunity to comment on these proposals.

Question 1:

a) Do you agree with the proposed standard approach to assessing local housing need? If not, what alternative approach or other factors should be considered?

No. The ambition to simplify the methodology for calculating housing need is welcome. But, the current proposals introduce an unreasoned approach.

The mixing of demographic projections with an essentially arbitrary 'demand' factor is not supported. Adding 'demand' to 'demographic need' and calling the resulting figure 'need' is both an inappropriate approach and fundamentally misleading to planning professionals, elected politicians, stakeholders and the public at large.

Question 2:

Do you agree with the proposal that an assessment of local housing need should be able to be relied upon for a period of two years from the date the plan is submitted?

No. We consider that it is important that this point is "fixed" at an earlier stage in the plan-making process. The stage at which this figure is 'fixed' should be moved forward to at least the Regulation 19 Publication stage. Ideally it should be earlier than this in the process, to allow a smoother preparation of the Regulation 19 document.

Question 7:

a) Do you agree with the proposed administrative arrangements for preparing the statement of common ground?

We recognise the potential value of preparing a Statement of Common Ground as a mechanism for demonstrating the duty to cooperate and for ensuring that effective collaboration takes place at early stages in the plan-making process.

There is no new guidance on the fundamental issue of how to select the area - housing market area and / or functional economic market area - for cooperation. Without more clarity on this there is increased potential for confusion and delay in the Local Plan process. It is not clear how authorities should act in circumstances where there may be different views about the definitions of a common area.

Clarity is also sought on the preparation of statements of common ground with authorities outside the housing market area and the role of County Councils in two tier areas.

Question 8:

Do you agree that the proposed content and timescales for publication of the statement of common ground are appropriate and will support more effective co-operation on strategic cross-boundary planning matters?

The timescales are challenging.

We also have concerns about the requirement to identify a "process for *agreeing* the distribution of housing need across the wider area, and *agreed* distributions". The wording relating to 'agreement' implies this is effectively a 'duty to agree' rather than a 'duty to cooperate'.

Question 9:

a) Do you agree with the proposal to amend the tests of soundness to include that:

i) plans should be prepared based on a strategy informed by agreements over the wider area, and

No. We are concerned about the proposed insertion of the word 'agreements' into the tests of soundness. The implication is that this is now a 'duty to agree' rather than a 'duty to cooperate'.

However, paragraph 66 of the consultation document states that the Statement of Common Ground will provide an opportunity for LPAs to set out where they have not been able to agree and what is needed to resolve this, which appears contradictory.

We recommend changing the word 'agreements' to 'engagement' or 'cooperation'.

Question 18

a) Do you agree that a further 20 per cent fee increase should be applied to those local planning authorities who are delivering the homes their communities need? What should be the criteria to measure this?

No. There are a number of circumstances, such as planning constraints i.e. Green Belt / AONB, which could result in Local Planning Authorities deciding to set a target for new homes lower than the need figure. We believe that planning fees should be able to be set locally to fully reflect the costs of planning applications and have long called for a change in policy to reflect this. In the absence of localised planning fees we are supportive of a further general uplift.

Additional Comments

1 – The consultation does not address some significant issues impacting delivery of homes, particularly the major issue of the relative weakness of Councils in dealing with 'viability' issues and the financing of and delivery of more affordable / social homes and infrastructure.

2 - The issue of how to fund social housing and how to either prevent social housing stock being lost to the private sector or how to continuously replace social housing stock is not addressed.

3 – We note the comment that the level of housing set out in a plan may be limited by Green Belt, SSSI, and Areas of Outstanding Natural Beauty. It does not however set out the mechanism or policy approach for limiting it.

4 - Affordability of new homes is influenced by more than simply supply/demand in an area. It can also be influenced by:

- Proximity and ease of access to major cities
- Size of homes. An area with predominantly 4 bed detached homes will have a higher average price than an area of 1 bed flats.
- Geography. Proximity to an Area of Outstanding Natural Beauty, Green Belt, attractive historic building etc will push prices up independently of sheer numbers.
- History and people's perception of local areas (thriving High St, cultural hubs, nightlife etc) all influence price.