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## Changes to the current planning system consultation: response from CPRE Northamptonshire

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The views expressed in this response are the Views of CPRE Northamptonshire which is an independent and autonomous body to CPRE The Countryside Charity as a national body.

**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?**

Using the housing stock method increases the housing requirement in rural authority areas significantly and disproportionately to urban areas. This will put pressure on growth villages and market towns to provide more homes and have a greater impact on the countryside in general. If unsatisfied need is displaced into villages that do not have sustainable means of accessing employment this is particularly unsustainable.

It should be noted that although the 10 year affordability figures could reflect a local undersupply it can often reflect an undersupply in other areas which are commutable from the affected area. Creating additional supply in a displacement area does not address the real need and encourages commuting by private car.

We would therefore not support this method and would recommend that the existing baseline method is retained in principal.

It should be noted that in Northamptonshire these changes are predicted to result in a 42% increase across the county with the more rural North Northamptonshire increasing by 64% and West Northamptonshire seeing a 24% increase. The lower figure for West Northamptonshire is as a result of a 37% reduction in numbers for the urban area and employment centre of Northampton.



**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.**

This is not applicable because we do not agree with the housing stock method

**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.**

No - House prices as a ratio to salaries can vary widely within a district; particularly rural areas with one large semi industrial Market Town.

Using the median house price when assessing affordability seems inappropriate since affordability is most critical at entry level.

Affordability is not helped by the current system of viability assessments which allows developers to reduce or eliminate proportions of affordable homes below the policy level for the authority, because the price that they have paid for the land exceeds its true value. Since the large homes are more profitable there is no incentive for them to negotiate harder when acquiring land.

If every authority had up to date housing needs surveys could a regulator figure be used?

**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 - In our own county of Northamptonshire the 10 year improved economic development (making higher house prices achievable for those employed in new higher paid jobs in the technology sector) and growth of commuters reacting to the price increases in the higher paid employment areas such as London, Oxford, Cambridge and the Home Counties. Poor affordability in these locations is driving commuters even further out to the "cheap" areas which in many cases involves long commutes by private car.

As rural properties come at a premium of around £30,000 to their equivalent in urban locations the affordability figures bias developments in unsustainable rural locations.

Whilst rail based commuting can be sustainable where commuters live near stations, car based commuting is not, therefore it is more important to address affordability where residents can realistically use public transport to access their workplace.

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

No - see response to question 4.



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?

9 months would seem more reasonable. The Inspectorate would need to be also given revised timescales for responses.

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?

6 months would seem more reasonable.

Another area which would need clarification in the interim period would be a clear statement on which housing figure is to be adopted prior to the adoption of the Local Plan to avoid excessive haggling at Public Inquiries. This should be the figure originally calculated and not the figure under whatever new method is agreed.

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)

i) as it increases rental tenure which most areas need more of to deal with homelessness and the strata of both the rural and urban population that are not ready to be first homeowners. This approach is less responsive to local needs and local housing needs surveys

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?

Retain existing exceptions.

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 comment

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

The transitional period would be more reasonable set at 9 months rather than 6 months.

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

Yes

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?

Yes. The types of market housing should however reflect the types of market housing identified from the local housing need.

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

No - As rural exception sites represent an exception to the adopted development plan a site size threshold is needed to control developments of a scale that would be completely contrary to Neighbourhood Plans. It also could encourage developers to put forward exception sites for the wrong reasons.



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

Yes

For each of these questions, please provide reasons and / or evidence for your views (if possible):

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

(see question 18 for comments on level of threshold)

No - This would set a dangerous precedent and would reduce Local Authorities powers to negotiate affordable homes in the future- once introduced. Once introduced for a time limited period there would be calls for its reintroduction. The right homes to fulfil the housing need should to be built in the right places. This approach would just encourage further speculative and inappropriate homes to be built.

If the limit is raised temporarily it should be contingent upon the homes being delivered within a very restricted time period to ensure that permissions without affordable homes are not simply banked for later use.

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

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

If a change is deemed necessary then this should be as small as possible e.g. 15 to 20.

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

No

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

No- This represents a dangerous precedent however if there is to be an increase to the threshold then this should be strictly linked to the delivery/ completion timescale and not enable developers to bank exempt developments.

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

Yes - Loopholes through which developers can gain permissions should be minimized.



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

Yes - Rural contributions should be left as they are in all areas and all cases.

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

Yes –

- 1) by allowing LPAs to prioritize smaller brownfield sites which SMEs might develop, by refusing greenfield sites in preference to brownfield.
- 2) By various forms of tax relief.
- 3) By controlling large developers land banking sites and thus allowing smaller sites to come forward to be developed by SMEs and requiring large sites such as SUEs to allocate small developable sites for SMEs (where this is already the case there have been issues with poor sites being offered to SMEs).

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

No

Section 89 talks about releasing land that is not allocated in Local Plans so with only a 14 day consultation period, and 5 week turnaround and presumably the threat of Appeals if not granted, LAs will be forced into granting Permission in Principle which is verging on bypassing the democratic process. This proposal will set a very dangerous precedent if it goes ahead and will put the countryside under significant threat.

No justification or evidence has been provided in the document for this process being required except the hope factor that it will bring forward the aspiration of 300,000 homes per annum which again is a figure which has not been adequately justified anywhere in the document.

## 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.

No - see answer to Q 24. Permission in Principle should continue to be restricted to small sites as at present.

## 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?

Yes - on the basis that Permission in Principle remain unchanged.





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

Yes - if Permission in Principle were to be extended (which is against our previous comments) particularly restrictions on height.

**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.

If extended the maximum publicity should be required and a statement of community involvement.

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

Yes

Fees for in principle approvals, if that is to proceed, should be higher as Planning Departments are being asked to do a quicker turnaround with often large and difficult sites. If Permission in Principle sites are not implemented in one year permission should be rescinded as this is only adding to already massive land banks and does nothing to increase housing numbers.

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

See answer to Q29. The Government should take notice of comments from Local Authorities who will be required to implement any changes on limited budgets.

**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 - Priorities need to be given to brownfield sites - there is still no correlation between brownfield releases set against greenfield release and protection of the countryside.



**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.**

Density should be stipulated on all in principle applications, pointing out that higher densities will be favoured particularly on brownfield sites - with appropriate height restrictions. If Permission in Principle does go forward design templates and design guides should be provided by Local Authorities.

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

We can see no benefits of the proposed changes to Permission in Principle. Time will still be needed at the stage of approval of conditions to achieve appropriate development before work can start on site. The most appropriate way forward is for developers and landowners to engage with their local authority at an early stage and then permission in principle should not be necessary.

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

There will be many ways in which land owners and developers will abuse these proposed changes and it will not produce the housing numbers the Government aspire to - land banking is one, abusing the affordable homes relaxation is another.

**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?**

If these changes are implemented they will do nothing for disadvantaged people and will probably increase rural homelessness.