



**Basingstoke
and Deane**

Basingstoke and Deane Borough Council

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Planning Policy Consultation Team
Planning Directorate – Planning Policy Division
Ministry of Housing, Communities and Local
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[Sent by email]

20 September 2024

Dear Sir/Madam

Response to consultation on proposed reforms to the NPPF and other changes to the planning system

The council continues to take a positive approach to planning for the local area and, as such, welcomes many of the principles underlying the proposed changes. This includes supporting changes which result in the delivery of additional affordable housing (especially socially rented housing) to meet needs and also the emphasis on plan making for guiding growth and change. However, the council has a number of serious concerns with the NPPF proposals which are at odds with these stated intentions. We understand the new Government's desire to take action, but do not believe that your approach will achieve the ends it desires: you cannot fix fundamental failings with the 'system' by simply setting higher housing numbers. We feel strongly about this, like so many others in local government. It is critical for Government to listen to the voice of local authorities and amend these proposals.

To be clear, we are not advancing a NIMBY argument. Basingstoke & Deane has undertaken more than its fair share of house building over recent years. We have been responsible, we are innovative and, above all, we are focused on delivering the socially rented homes that we know we desperately need. That is why we ask that Government thinks again and chooses to work with us as partners.

Chief Executive Russell O'Keefe
Deputy Chief Executive Rebecca Emmett

Director of Resident Services Fiona Darby
Director of Regeneration Sarah Longthorpe
Director of Customers, Digital and Improvement Katy Sallis

The NPPF needs to empower councils, not dictate to us – success requires collaboration, not imposition. The Government has an elected mandate, and so too do local authorities.

There are some key areas we would like to highlight:

Housing need calculations

The council strongly objects to the proposed new housing need figures. Whilst we fully support measures to increase the volume of affordable housing (especially socially rented housing), the proposed step change in market housing numbers is both severe and immediate, and will lead to high levels of unsustainable and unplanned development, especially over the shorter term. The provision of new homes should not be at the expense of environmental objectives (as outlined in the Environment Act), climate change objectives and the need to provide infrastructure alongside development.

There is a deep concern that the proposed housing targets are undeliverable, both in the short and longer term and will not solve the affordability crisis. When the increases required are this significant, the reality is that areas such as Basingstoke & Deane will be even more dependent on developers and landowners than we are now. The ability and willingness of the development industry to deliver the number of homes required is questioned as it is not in their interest to overdeliver in light of market forces. The real solution is to introduce measures that discourage developers from sitting on land rather than simply increasing the number of outstanding planning consents; we have enough of these already. Please look again at how the housing number is calculated.

We can get on with building our planned-for sites if we are allowed to progress our post Regulation 18 draft plan. We have a plan that works, building homes we know we need in the places that can best sustain them.

Transition arrangements

The proposed transition arrangements are not supported as currently drafted. The council has been moving at pace to progress its local plan to deliver much needed new housing and we remain ready to move quickly. We agree that growth should be plan led. However, the proposed changes effectively force us back to the drawing board, and will only delay our efforts, which is not what anybody wants.

We have reached a significant stage of plan making, undertaking a Regulation 18 consultation earlier in the year. At this late stage of the process, the proposed arrangements are too limited and do not support the Government's expressed intention of maintaining progress with plans. The plan-led system is completely undermined by the current proposals.

The transition arrangements need to be rewritten to support plans such as ours to move forward under the current system in a realistic timescale, and better reflect the extensive resident engagement and hard work undertaken by already stretched planning teams in local authorities. We ask that more pragmatic arrangements are

introduced for authorities that have successfully completed Regulation 18, alongside direct funding to enable us to undertake the unforeseen additional work and reopen engagement with communities.

Forcing us back to an earlier point in the plan making process, when we are ready to proceed post our Regulation 18 draft plan consultation, will set us back years.

Housing land supply thresholds

The loss of the four-year housing land supply threshold is also not supported. Its removal will lead to unsuitable speculative development in our area which will last for a number of years if the final changes require us to go back to a call for sites. It is vital that a reduced short term land supply requirement, or other transitional arrangement, is introduced; the immediate removal of this type of protection will leave the council in a position where it cannot meet its land supply requirements, with no way of rectifying that position in the short term. The five-year land supply approach, as proposed, will do more damage than good. As the Government is aware, development takes time and the planning process should not be altered to enable unmanaged and unsustainable development to drive housing delivery.

That developer free-for-all is something we want to avoid. We want planned development supported by local communities. Firm planning regulations should require developers to start building within twelve months of permission and complete within a reasonable time, they should not be allowed to game the system.

Industry challenges

From our experience, we doubt that the housing industry can build the number of homes that the Government wants. There simply are not enough skilled people or sufficient building materials to complete so many new properties.

We are seeing a dangerous consolidation of the industry into a few major housing companies that will dominate and control the market. We need to promote small and medium sized developers that can offer quality and variation. Just letting the big corporates carry on when they are land banking and controlling supply and prices cannot be right. At the moment, the industry controls delivery rates. Ramping up the numbers without reforming the sector will only make matters much worse. It will promote conveyor belt development with poor standards; it will be a race to the bottom. We do not believe that Government wants this; neither do we.

For the industry to be successful, land tax arrangements, skills shortages and viability all need to be tackled. Taxing companies for land banking would be a sound approach and help redress the imbalance we currently see.

Infrastructure

Infrastructure is a major problem. We do not have the schools, public transport or GPs to serve new communities. Water supply and electricity are also constraints, while sewage management is a major worry.

In Basingstoke & Deane's case, we cannot take the level of growth Government desires without a new hospital. Sir Kier Starmer promised the people of Basingstoke a new hospital during the General Election campaign, but the necessary funding has since been questioned. Homes without infrastructure will only create greater social problems. We need to think about place, quality and community.

Environmental concerns

We cannot support demands for more housing if it results in us killing local rivers and waterways. The ecological crisis is as important as the climate crisis. We do not want to see volume housing building result in a degradation of environmental policies. Relaxing rules around nutrient neutrality, is not the same as finding meaningful solutions. We do not wish to irrevocably pollute the chalk aquifer that serves the River Test. Both the River Test and Loddon are at the tipping point of irrevocable damage. This is not considered serious enough to be an exceptional circumstance within the scope of NPPF; however, it is of huge concern to our borough.

New towns

The council supports the emphasis on suitably-located new towns to deliver the levels of growth required and would welcome working with partners to help the government in identifying and delivering such opportunities locally. It is hoped that Local Planning Authorities are given the opportunity to play an important role in this work.

Genuinely affordable housing

Finally, whilst the emphasis on the provision of affordable housing (especially socially rented housing) is strongly supported, it is considered that the Government could do more to support the provision of new affordable housing. This can be achieved both through the provision of suitable funding and also by updating current national planning guidance on assessing viability for plan making, so that the actual reality of affordable housing delivery can be reflected. Developers should demonstrate their viability calculations based on the true financial reality of affordable housebuilding, rather than an artificial construct. Viability rules and processes are a major obstacle to the delivery of socially rented homes.

A clear definition of "affordable" is required. Just setting it at a percentage of average prices does not work, as the industry drives its financial results by "upselling" to more expensive units, so endlessly increasing the average.

Permitted Development

We would welcome changes that tackle the problem of permitted development of offices (or other buildings in employment use) into residential. These developments should be subject to the full local planning process so that they can be properly assessed against policy. Developers should also have to use local authority building control services - we should learn the lessons of Grenfell on this point and developers should not be able to appoint their preferred contractors.

Closing thoughts and a better way forward

There is so much we could do in partnership. The current NPPF proposals need to reflect the hard work that many councils have been doing to develop local plans and help us to get on with delivering homes through a planning framework; we need to be protected from speculative development.

District Councils remain your greatest asset. We are the face of government that people see day in day out. Instead of a Local Government versus Central Government battle, would it not be novel and groundbreaking for us to work together to reflect our respective democratic mandates and deliver something we can really be proud of?

We would welcome discussing this further with you.

Yours sincerely

Cllr Paul Harvey, Leader at Basingstoke and Deane Borough Council

Cllr Andy Konieczko, Portfolio Holder for Planning at Basingstoke and Deane Borough Council