

RAYNSFORD REVIEW CALL FOR EVIDENCE - THEME 1: The English planning system and sustainable development

A response by the Campaign to Protect Rural England to the Raynsford Review of Planning Call for Evidence.

Paul Miner, CPRE. October 2017

This section addresses the second point within the Call for Evidence bulleted list before the first.

Does the National Planning Policy Framework [NPPF] provide an effective framework for the delivery of sustainable development?

CPRE does not believe that the NPPF provides an effective framework for the delivery of sustainable development. The 2005 UK Sustainable Development Strategy is referred to the NPPF, but not in the sections of the document that have any weight in policy or decision-making. The policies in the NPPF that do have weight (paragraphs 18 to 219), are overall heavily biased in CPRE's view towards achieving short term economic growth with little consideration of how this can be integrated with social or environmental priorities.

Since the publication of the NPPF in 2012, the picture has worsened. The 2005 Strategy has withered on the vine and Government departments are no longer held accountable for monitoring progress towards achieving it.

The Government now states that it is 'fully committed'ⁱ to the implementation, both domestically and internationally, of the United Nations Sustainable Development Goals (SDGs). A number of the SDGs have a clear relevance to the UK planning system, in particular 11 (making cities and human settlements inclusive, safe, resilient and sustainable). The ONS has also recently consulted (until September 2017) on how to measure progress in achieving the SDGs.

The SDGs are not referenced clearly in any current statement of national planning policy, guidance, or related consultation. We recommend that the Review should thoroughly consider how the references to sustainable development in the NPPF, which are now largely out of date, should be refreshed and given more weight in the light of the SDGs.

Does the planning system contribute to achieving sustainable development in the long-term public interest?

The planning system has the capability to make a major contribution to achieving sustainable development, and working in the long-term public interest has been an important element of the underlying ethos of the modern system since its creation in 1947. From CPRE's perspective, a critical outcome is to achieve sustainable land use and minimise the unnecessary loss of greenfield land to built development. Much more new housing is needed, and some of this will need to be on greenfield; but if insufficient regard is given to the type and location of this housing, significant and unnecessary losses of countryside will follow. Prioritising the reuse of brownfield land - of which England still has a plentiful and constantly replenishing supplyⁱⁱ - and other established policy tools such as Green Belts and protected landscapes, have made a massive contribution towards sustainable development in England.

CPRE does not believe that the planning system has, since the publication of the NPPF in 2012, made a sufficient contribution to the achievement of sustainable development. This is in particular relation to three areas:

Use and recycling of land for new housing: SDG 11 includes an indicator relating to the 'ratio of land consumption rate to the population growth rate'ⁱⁱⁱ. Planning policies in the 2000s that allowed local authorities to (i) prioritise the use of previously developed (or brownfield) sites and (ii) avoid development below medium residential densities of 30 to 50 dwellings per hectare were not included in the NPPF. This has contributed to a considerable increase in recorded land take of undeveloped greenfield land for housing development, from 1,510 ha in 2007 and 1,130 ha in 2011 to 3,328 ha in 2015. Yet the annual housebuilding completions of 139,670 were actually over 30,000 less, or more than 15% lower, in 2015 than they were in 2007^{iv}. Another factor that is likely to be relevant here is the type of housing built. (See below.) This increasing profligacy in the use of land is highly concerning, especially as annual housebuilding rates are expected to significantly increase on 2015 levels in the coming years.

Overall housing land requirements: A further SDG11 indicator refers to the implementation of urban and regional development plans integrating population projections and resource needs. The Government has sought to significantly boost the supply of land for housebuilding. There is broad consensus that overall levels of housebuilding do indeed need to be boosted to at least 250,000 new homes per annum from the current levels mentioned above. But the NPPF and supporting Planning Practice Guidance has served to discourage a long-term approach to settlement development by insisting that a high amount of this land must be readily deliverable within five years, regardless of whether an area has an up to date plan in place.

CPRE has highlighted the effects of the current approach in several reports^v. In broad terms, there has been a loss of focus on urban regeneration and slow progress made in identifying and developing good locations for entirely new settlements; and instead an increasing prevalence of low density housing for the middle and upper end of the market on greenfield sites on the edge of towns and large villages, and even estates in open countryside labelled disingenuously as 'garden villages'. Included within this has been an increasing resort to Green Belt release^{vi}.

The Government's preferred approach to setting and meeting overall housing requirements in future, set out in a current consultation paper^{vii}, is based on

projecting forward recent levels of growth in individual local authorities. This is likely to exacerbate the growing problems of regional imbalance and unnecessary countryside loss unless it is substantially revised.

CPRE remains a strong advocate for Green Belt policy. Green Belts provide the benefits of open countryside - recreational routes, local nature reserves, fresh farm produce and woodland - close to the 30 million people who live in England's largest urban areas. We have strong evidence to show that much of the recent criticism made of Green Belts is either unfounded or based on highly questionable evidence^{viii}. Green Belts have a major role to play in the sustainable development of England. The policy restrains the desire of many to continue concentrating development in the South East of England and to build on greenfield sites in other regions where there are plenty of brownfield alternatives.

Affordable housing: A target under SDG11 is 'By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums'. Changes to planning policy and guidance have reflected a wider Government approach of disinvestment in housing since 2010. Yet in rural areas, due to relatively low average incomes, there is a particular need for social rented housing at rates well below the overall market average.

CPRE research has uncovered disturbing evidence that we now seem to be set for a vicious downward spiral of failing to meet rural housing need. Due to policy considerations of viability, which the NPPF has served to entrench, the policy targets themselves are first watered down, and then often not met in practice. We analysed 62 rural local authorities^{ix} that have adopted plans since 2012.

In general, local plans produced since the NPPF came into force are seeking to meet the overall or full objective assessment of need. But in relation to the part of the assessment relating specifically to affordable housing, local plans are coming up short by a long way. CPRE has compiled overall estimates for current affordable housing need, targets and delivery across all 62 rural authorities who have adopted a Local Plan since 2012^x, set out in the table below. Note that these figures largely if not entirely relate to homes that meet the Government's definition of 'affordable' which can include homes for sale or rent at up to 80% of local market values. Such homes are not necessarily affordable in terms of the relationship to local people's incomes. Given that average incomes in rural areas are lower than in urban areas, the situation in terms of development meeting local housing needs is likely to be significantly worse even than this data represents.

	Number of homes per year	Original data source
Affordable housing need	46,100	Based on figures from Strategic Housing Market Assessments quoted within the local plan document.
Affordable housing target	25,500	Extrapolated from local plan affordable housing policies.
Affordable housing delivery (completions)	18,700	Based on an average annual delivery over past three years (DCLG)

How can effective changes be made to national policy on key issues such as the viability test?

CPRE agrees with the Review that national policy on viability is a key issue needing further consideration, especially in the light of the effect of the policy in rural areas set out above. Since the call for evidence was issued, the Government has proposed to reform policy on viability^{xi}. CPRE currently intends to welcome the proposals to introduce more definitive guidance on how to do viability assessments, and for more consistent reporting by local authorities on the benefits expected from Section 106 planning agreements. It appears to us that very few local authorities provide clear reports on their use of, and the money gained from, planning agreements. Carlisle is a rare example of good practice.

CPRE recommends that the Review looks particularly closely at whether a transparent and trusted approach can be put in place for measuring viability within plan-making. This should aim to set out a reasonable proportion of affordable housing in future private developments. It may in turn help to increase affordable housing provision, especially if it is also reinforced by new public investment. Most critically, a continuation of mixing (so-called ‘pepper-potting’) of social housing within private developments would help foster socially mixed communities rather than ones segregated by income.

ⁱ See, for example, the Government Response dated 29 September 2017 at Appendix 1 to the House of Commons Women and Equalities Committee Eighth Report of Session 2016-17, *Implementation of Sustainable Development Goal 5 in the UK*, available from <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/426/42602.htm>.

ⁱⁱ See, for example, CPRE and the University of the West of England, *From Wasted Spaces to Living Spaces* (2014), and CPRE, *Housing Capacity on Suitable Brownfield Land* (November 2016).

ⁱⁱⁱ For this and all other references here see <https://sustainabledevelopment.un.org/sdg11>

^{iv} DCLG Housebuilding Live Table 253; Land Use Change Statistics (LUCS) Tables 226 and 370. It should be noted that changes in the method for collecting LUCS took place between 2007 and 2013, however most of the increase in recorded land take within this period has taken place since the first report under the new method in 2014.

^v CPRE publications *Targeting the Countryside* (2014) and *Set Up to Fail* (2015), available from www.cpre.org.uk

^{vi} CPRE, *Green Belt Under Siege 2017* (May 2017).

^{vii} DCLG, *Planning for the right homes in the right places: consultation proposals*, September 2017.

^{viii} CPRE, *Green Belt Myths: CPRE’s guide to what you need to know*, updated January 2017.

^{ix} The 62 local authorities surveyed were:

Allerdale, Babergh, Basingstoke and Deane, Bath and North East Somerset, Broadland, Cannock Chase, Carlisle, Cherwell, Cheshire West and Chester, Chichester, Copeland, Cornwall, Dacorum, Daventry, East Cambridgeshire, East Devon, East Dorset, East Hampshire, East Northamptonshire, East Riding of Yorkshire, East Staffordshire, Fenland, Great Yarmouth, Hereford, High Peak, Horsham, Lewes, Lichfield, Malvern Hills, Mendip, North Dorset, North Kesteven, North Somerset, North Warwickshire, Ribble Valley, Richmondshire, Rother, Rushcliffe Borough City, Ryedale District Council, Selby, Shepway, South Derbyshire, South Norfolk, South Northamptonshire, South Somerset, Stafford, Staffordshire Moorlands, Stratford-on-Avon, Stroud, Suffolk Coastal, Teignbridge, Test Valley, Vale of White Horse, Wealden, Wellingborough, West Dorset, West Lancashire, West Lindsey, West Somerset, Wiltshire, Winchester, Wychavon

^x The Office for National Statistics defines 145 local authorities as predominantly or significantly rural; 62 of these have adopted local plans since 2012 and are included in this analysis.

^{xi} DCLG 2017, op cit.