



October 2023

Levelling-up and Regeneration Bill: Consultation on implementation of plan- making reforms

Consultation response from The Housing Forum

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Response submitted by:

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About The Housing Forum

The Housing Forum is the UK's cross-sector, industry-wide organisation that represents the entire housing supply chain. Our growing membership drawn from over 150 organisations across the public and private sectors and includes local authorities, housing associations, housebuilders, architects and manufacturers. All share our determination to drive quality in the design, construction and decarbonisation of UK homes. They have a commitment to partnership working and share in our vision of 'A Quality Home for All'.

In order to achieve this, we have advocate for policy change needed for everyone to live in a good quality, sustainable and affordable home. Our key [Housing Solutions](#) set out how we think this can be achieved.

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Introduction

The Housing Forum, with a membership base across the entire of the housing sector sees the benefit of Local Plans and our members agree that process surrounding Local Plans needs simplification, acceleration, and a stronger focus on delivering value for money. **We support the Government's efforts to make the plan-making process simpler and faster** and the **approach to greater standardisation where practical is welcomed**.

We also **welcome the ambition of improving engagement in the plan-making process, and the use of digital tools** to assist this. Local communities need support to recognise the value in engaging at this early stage, creating a smoother process downstream of granting applications that are in line with the Local Plan.

We do have some concerns that we feel the Government needs to address to realise its ambitions:

- Firstly, it is **vital that the current situation where only a minority of local authorities have an up to date adopted plan is addressed**. This has happened in a situation of chronic under-funding of local authorities and lack of incentives to bring forward plans. The reforms to NPPF which were proposed in December 2022 were expected in 'spring 2023' but have not yet been published. This is left local authorities in greenbelt areas, or where there is political division over new housebuilding numbers stuck and unable to progress because they are waiting for clarity. It is vital that the move to a new system of plan-making recognises this reality and does not exacerbate it by creating an additional incentive to stall.
- Secondly, **the Government needs to assess and addresses the costs of Local Plans**. Currently, it averages between £6 million to £7 million to produce a Local Plan, and these costs are escalating due to skill and capacity shortages in the professional and specialist fields contributing to the Local Plan. In the current financial climate, producing a Local Plan can become seen as a luxury. Removing the requirement for Local Planning Authorities (LPAs) to pay the Planning Inspectorate's costs in reviewing local plans (and increasing the Inspectorate's resources to match) would create better incentives to bring forward Local Plans as well as helping alleviate pressure on local authority finances.
- We are concerned that we are being asked to comment on proposals for greater use of standardised templates, when the details have not yet been published. **It is vital to get the distinction between national and local policies right**.
- Finally, we are **concerned with the suggestion that LPAs with an up to date Local Plan could no longer have to demonstrate a 5 year land supply**. This could reduce the supply of land coming forward for much-needed new housing, because there is no mechanism to ensure that the delivery of housing is matching the plan. We have suggested some alternative ways to incentivise Local Plans being up to date.

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Response to questions

Chapter 1: Plan content

Question 1: Do you agree with the core principles for plan content? Do you think there are other principles that could be included?

The Housing Forum is supportive of the core principles for Local Plans outlined in the consultation to make plans shorter, quicker and more accessible. We are keen to see efforts to increase local engagement in this process, and this should be done with a view to creating a more streamlined system downstream where development that is in line with a Local Plan is more swiftly approved.

We support the principle of focusing Local Plans on local policy and removing the duplication of national policy out of these plans. This will be more efficient and cost-effective for Local Planning Authorities (LPAs) as well as creating a simpler operating environment for those looking to bring forward planning applications.

However, we are concerned about the potential scope of new national policies on which we have not yet seen the detail. It is not clear at this stage what these standard approaches will involve and how much flexibility there will be for local authorities to deviate from them. We are concerned that the detail needs to be carefully considered to ensure that local authorities retain control over policies that can help them meet their housing needs and wider local needs.

We would like to see national guidance to make it clear what local issues should be made into policy and what should be left out. A level of consistency across Local Plans would help with their interpretation nationally, whilst supporting local authorities to focus on locally distinct issues and reflect their vision for the future of their area. Wording such as “may include” (for instance around the requirement to include affordable housing within Local Plans) fails to provide the clarity needed and creates the likelihood of duplication of policies at the local and national levels.

Local authorities should be incentivised to have an up-to-date Local Plan and the requirement not to have to demonstrate a 5-year land supply would help achieve this – though we think it is necessary to ensure that a plan is being delivered against for this to apply. Other ways to incentivise an up-to-date plan would be offering grant funding for housing or infrastructure which is conditional on having an up-to-date plan.

Local Plans should be digitalised, and there is a clear role for central government here in providing local authorities with the digital tools to help them to create interactive Local Plans.

We are supportive of piloting community land auctions, though some work is needed to establish how these work as part of a Local Plan process as they are a fundamentally different way of deciding what goes where.

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Question 2: Do you agree that plans should contain a vision, and with our proposed principles preparing the vision? Do you think there are other principles that could be included?

We think the local vision is an essential aspect of a Local Plan. It needs to be reflected through the detail of the plan and to identify separately the intended outputs which will help deliver the vision – outputs should be delivered within timescales of the Local Plan and be measurable. For instance, a vision may include better public health, and the outputs may include a programme of new cycle and walking routes. The completion of the cycle and walking routes should be measurable, even if the public health benefit is not.

The vision needs to be aligned with the local authority’s corporate and strategic priorities, and with visions already set out by other layers of local government, such as county councils and mayoral authorities.

Question 3: Do you agree with the proposed framework for local development management policies?

The Housing Forum supports the principle of National Development Management Policies (NDMPs) to cover matters that can be standardised across the country, and local authorities focussing on the spatial elements. This reduces local authority workload and creates an easier operating environment for planning applicants. However, without having seen the detailed content of the NDMP, or the checks at each ‘gateway’ it is difficult to comment fully on the appropriateness of what aspects are to be covered via NDMPs or decided locally.

We believe that Local Development Management Policies (LDMP) should be evidenced and justified.

Question 4: Would templates make it easier for Local Planning authorities to prepare Local Plans? Which parts of the Local Plan would benefit from consistency?

The Housing Forum’s members include both local authorities and the housebuilding sector (including housing associations). There is strong support for templates from those who experience the planning system as applicants – as they would create a more consistent environment for them. Areas where standardisation would be most appreciated include policy maps, the evidence base, housing policies (housing target, affordable target, etc)

However, there is some concern from our local authority membership base that templates run counter to the agenda of strengthening engagement and ensuring local ownership of the Local Plan. There is clearly a need for balance here – creating templates where they are useful and covering matters that would always be included in all plans, but avoiding a “tick box” approach that local authorities find is not always applicable to their area, or where the level of direction causes a loss of local ownership.

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Question 5: Do you think templates for new style minerals and waste plans would need to differ from Local Plans? If so, how?

No comment.

Chapter 2: The new 30 month Plan timeframe

Question 6: Do you agree with the proposal to set out in policy that planning authorities should adopt their plan, at the latest, 30 months after the plan preparation process begins?

The Housing Forum supports the use of Local Plans and is very concerned about the number of plans that have been withdrawn or paused recently due to continued uncertainty about government policy. Changes proposed almost a year ago have still not been confirmed. This is creating a situation where local authorities are failing to provide enough land for housing and speculative applications are being made which may not be in line with local visions.

We support the ambition of speeding up the process of creating a Local Plans, though our local authority members consider it challenging, at best. Achieving it requires two things:

1. Better resourcing of local authority planning departments, with the skills needed for digital engagement and support from central government over how to resolve contentious issues such as the greenbelts.
2. Government creating a position of certainty regarding future planning reforms.

Meeting the 30 month timescale is likely to be particularly difficult in local authorities where political control changes during this period.

The other big challenge to the timescale is the need for coordination of the Local Plan with neighbouring local authorities and between layers of governance (ie county, or mayoral authority). A National Spatial Plan would help here.

The government also needs to consider how to incentivise local authorities to meet the 30 month timescale, and what to do if they fail to do so. The current lack of adopted Local Plans highlights the lack of current mechanisms to meet existing targets.

Question 7: Do you agree that a Project Initiation Document will help define the scope of the plan and be a useful tool throughout the plan making process?

We agree that Project Initiation Documents should help to identify local constraints and challenges and through setting out transparently what evidence will be required to inform decisions. However, there is a lot currently proposed in this pre-initiation phase, including both identifying constraints and projecting management. We are concerned that these are likely to take longer than four months and that frontloading work before the “30 month clock” starts ticking risks undermining the government's ambition of speeding up the plan-making process. One way round this dilemma might be to consider which aspects of the pre-

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initiation phase are not so time-sensitive, in that they do not go out of date. Mapping out the plan-making process earlier, and over a longer period of time is less likely to be a problem. In contrast, identifying constraints should not be done too early as it could become out of date if this takes place too many years before the plan is adopted.

Local authorities need to be encouraged and supported to put adequate resourcing into this pre-inception period.

Chapter 3: Digital Plans

Question 8: What information produced during plan-making do you think would most benefit from data standardisation, and/or being openly published?

The standardisation and open publication of data will make planning for all involved more efficient, transparent and accessible. Standardisation between areas will make it easier for cross-local authority working and also for private sector organisations (such as housebuilders) who operate across different areas.

Any and all evidence supporting Local Plans which underpins decision making would benefit from standardisation and open access. It is particularly important for data underpinning assessments of housing need to be openly published, as it is the most contested topic and greatest delay to Local Plans adoption.

It is also important not to exclude data from a Local Plan because it cannot be provided in standard format for some reason – being able to justify the inclusion of data that is not in the standard format is therefore important.

Question 9: Do you recognise and agree that these are some of the challenges faced as part of plan preparation which could benefit from digitalisation? Are there any others you would like to add and tell us about?

We agree with the challenges listed. In addition, we are aware of a need to standardise the data relating to housing need and also of potential for real-time data on housing starts and completions. There is a recurrent myth that circulates about large numbers of unbuilt planning permissions (“a million” nationally) and landbanking being the cause of inadequate housing supply, which causes people to oppose allocating more land for housing. Real-time data on planning permissions granted, starts and completions would help create a more informed debate on this issue, at least at local level.

Question 10: Do you agree with the opportunities identified? Can you tell us about other examples of digital innovation or best practice that should also be considered?

We agree with the list of opportunities identified. In addition, we think there is a strong need to improve public engagement via digital means. This could help to address the current demographic imbalance in who engages with planning ,to include more younger people.

Digital planning tools will be imperative to be able to produce plans within the 30-month period.

Question 11: What innovations or changes would you like to see prioritised to deliver efficiencies in how plans are prepared and used, both now and in the future?

We would like to see a real drive to get local authorities planning at a wider spatial scale, to encourage more ambitious and joined up plans that include plans for new infrastructure.

We would like to see clear thought to the best role for local councillors to play in Local Plan making – it is important that they feel they own the vision, though also important that a change in administration does not require a plan-making process to go back to the start. Getting local councillors involved in each gateway meeting could help to ensure they feel ownership of the process. It is also important to give responsibility to local officers, who are professionals with real expertise in the many detailed matters that affect a Local Plan. Doing so can help move a plan along more swiftly.

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Chapter 4: The Local Plan timetable

Question 12: Do you agree with our proposals on the milestones to be reported on in the Local Plan timetable and minerals and waste timetable, and our proposals surrounding when timetables must be updated?

We support the proposed milestones for Local Plan timetables and the requirement to revise a timetable every six months or at other times as necessary.

Question 13: Are there any key milestones that you think should automatically trigger a review of the Local Plan timetable and/or minerals and waste plan timetable?

A review to the timetable should occur if new evidence emerges that is likely to affect the contents of the plan. In particular if there is evidence of a significant change to housing demand or need, or housing delivery has dropped below target then the new plan needs to change to take account of this evidence.

It may also be necessary to amend timetables if there is a change in national policy. The government should avoid changes in national policy that are likely to disrupt Local Plan timetables, and ensure that any changes that are made happen as swiftly as possible to minimise the impact.

Chapter 5: Evidence and the tests of soundness

Question 14: Do you think this direction of travel for national policy and guidance set out in this chapter would provide more clarity on what evidence is expected? Are there other changes you would like to see?

We see no support for removing the requirement justification of a Local Plan. We believe that plans and decision making should be justified. Local authorities are also

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concerned that removing the requirement for justification could lead to protracted discussions at examination as objectors seek to challenge a Local Plan.

However, many of our members from across both the local authority and planning applicant positions currently believe that the current level of evidence required is disproportionate so we welcome efforts to reduce this. Clarity is needed over what level of evidence would be deemed appropriate. Planning decisions can be controversial, so it is particularly important that the process is open, transparent and evidence based.

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Question 15: Do you support the standardisation of evidence requirements for certain topics? What evidence topics do you think would be particularly important or beneficial to standardise and/or have more readily available baseline data?

The Housing Forum supports the standardisation of evidence requirements.

It would be beneficial to standardise the baseline data of most types of evidence, but particularly those relating to the most contentious topics including:

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- Affordable housing requirements
- Market housing requirements
- Site assessments
- Open space
- Impact assessments
- Viability

Question 16: Do you support the freezing of data or evidence at certain points of the process? If so which approach(es) do you favour?

We would suggest that the approach to this is set out in the early stages of plan-making. Some new data that will emerge during the time of plan-making will be known about in advance (for example the ONS have published the timetable for releasing census data, and most administrative data is collated annually) so any plans to update to include this data should be built into the plans. The methodology can also set out an agreed approach to new data or evidence that emerges during the plan-making process which was not known about in advance. This would reduce the scope for disagreements about whether or not to amend the plan in the light of the new evidence.

Beyond this, we would support an approach of freezing data at agreed points and would suggest that Gateway 2 would be the appropriate point for most issues.

Question 17: Do you support this proposal to require Local Planning authorities to submit only supporting documents that are related to the soundness of the plan?

We do not support this proposal. If documents are being used to inform decisions made in the Local Plan then they should be submitted as part of the evidence base. Without this, the process is not transparent. Guidance should be issued for local authorities on how to deal with large amounts of evidence including ways to help

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local communities find their way around it and distil the key information they may need.

Chapter 6: Gateway Assessments during Plan-making

Question 18: Do you agree that these should be the overarching purposes of gateway assessments? Are there other purposes we should consider alongside those set out above?

We support the approach to provide checks and support to local authorities during the plan-making process. The costs of these should be borne by government rather than by local authorities, in order to encourage uptake and ensure no disincentive to progress with a Local Plan. It would be most effective if some of the checks carried out earlier on can be carried forward, reducing the work of the Local Plan enquiry later on.

We note that capacity within the Planning Inspectorate would need to increase to provide this service, especially if it is to be done without delaying the Local Plans.

Question 19: Do you agree with these proposals around the frequency and timing of gateways and who is responsible?

We are concerned about the length of time that the gateways will take, and the feasibility of meeting the 30 month deadline, especially if the Planning Inspectorate is not adequately resourced to undertake the gateway assessments and to cope with any delays or changes to the timetable that local authorities may experience.

Question 20: Do you agree with our proposals for the gateway assessment process, and the scope of the key topics? Are there any other topics we should consider?

We agree with the proposals for the scope and key topics. Topics likely to be controversial such as overall housing numbers, the affordable housing strategy and the greenbelt should be dealt with during Gateway 1. Issues that run across local authority boundaries also need clarity at an early stage.

Whilst housing need will be set out by the standard method during Gateway 1, this will not set a level of affordable housing for the Local Plan area. This should be agreed during Gateway 1 to ensure an appropriate strategy for the delivery of affordable homes is established early on.

Question 21: Do you agree with our proposal to charge planning authorities for gateway assessments?

The Housing Forum strongly disagrees with this proposal. Local authority finances are very stretched and the gateway assessment process is a new element with no funding currently available for it. If the government wants to (rightly) encourage them to bring forward Local Plans it should place as few impediments as possible. Otherwise there is a risk that the more urgent demands will take priority over aspects such as Local Plan making which brings longer term benefits.

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Chapter 7: Plan examination

Question 22: Do you agree with our proposals to speed up plan examinations? Are there additional changes that we should be considering to enable faster examinations?

We agree with the principle of trying to speed up Local Plan examinations. However, for this to be successful and without damaging the ability of third parties to input, it is essential that local authorities have submitted their evidence, as well as written responses to questions in advance.

The Planning Inspectorate needs to be adequately resourced to deal with a faster process.

A longer examination period may be necessary for local authorities whose plans are contentious or where joint working across local authority boundaries is critical to the plan's viability.

Question 23: Do you agree that six months is an adequate time for the pause period, and with the government's expectations around how this would operate?

We agree with six months as a maximum, though local authorities and the Planning Inspectorate should try to reduce this where possible. We also note that the gateway process and agreements about when evidence is frozen should make a pause less likely to be necessary.

Chapter 8: Community engagement and consultation

Question 24: Do you agree with our proposal that planning authorities should set out their overall approach to engagement as part of their Project Initiation Document? What should this contain?

We agree that the overall approach to engagement should be set out in the Project Initiation Document, though note that some further detail on this may come later on, which would be dependent on the conclusions of the earlier part of the process. The gateway process provides an opportunity to monitor the success of the engagement strategy and amend it as necessary.

Although the detail of engagement will of course be locally driven – we would also suggest that the digital toolkit and the new guidance on community engagement include some detail and guidance. It should also be made clear to the public what can and cannot be commented upon and – importantly – why or why not. This would help reduce any frustration with the process from people who want to engage but feel they are not being listened to.

Question 25: Do you support our proposal to require planning authorities to notify relevant persons and/or bodies and invite participation, prior to commencement of the 30 month process?

We would suggest that this is limited to neighbouring authorities and other levels of government. Local authorities do not think that it is useful to consult with wider

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stakeholders at this early stage, when there is not yet anything for them to respond to. The Government should clarify the future replacement of the Duty to Cooperate, before confirming this approach.

Question 26: Should early participation inform the Project Initiation Document? What sorts of approaches might help to facilitate positive early participation in plan-preparation?

A strategy on how to involve stakeholders should form part of the PID and some stakeholders may need to be consulted as part of this process. Further engagement on the contents of the plan itself should come later to avoid adding an extra layer of consultation.

Question 27: Do you agree with our proposal to define more clearly what the role and purpose of the two mandatory consultation windows should be?

We agree with definitely the purposes of the two consultation windows. We would caution against too much prescription on methods, as this is an area where local authorities can be innovative and creative and adapt their methods to what they know works with their particular communities.

Question 28: Do you agree with our proposal to use templates to guide the form in which representations are submitted?

There is a role for templates in collecting data from the public or stakeholder consultees in a common format which is easier to analyse. Templates need to be user-friendly and simple to be popular; otherwise people will either bypass them via other means (emails, letters, etc) or not engage. However, keeping templates simple means that they cannot capture all the nuance of people's views especially around specific sites. We therefore recommend a mixed method approach to consultation.

Chapter 9: Requirement to assist with certain Plan-making

Question 29: Do you have any comments on the proposed list of prescribed public bodies?

We agree with the list proposed. In addition, we would suggest adding:

- Local Registered Providers with significant amounts of housing in the area
- Active Travel England
- National Highways.

We note that without increased public sector resourcing many of those listed are unlikely to have the resource needed to input.

Question 30: Do you agree with the proposed approach? If not, please comment on whether the alternative approach or another approach is preferable and why.

Yes

Question 31: Do you agree with the proposed requirements for monitoring?

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We support the proposed standardised approach to monitoring. We would suggest this is done on an annual basis. Local authorities need to be adequately resourced and incentivised to complete monitoring information.

Question 32: Do you agree with the proposed metrics? Do you think there are any other metrics which planning authorities should be required to report on?

We agree overall. We think the overall approach should be relatively light touch and allow local authorities to set some of their own targets which relate to their overall vision and the outputs that will be needed to achieve it.

There is a need for housing data to go beyond units and include:

- Net additional dwellings completed (ie subtracting demolitions)
- Net affordable dwellings completed. (via demolitions, sales or acquisitions).
- Net affordable dwellings by number of bedrooms (as there is an acute shortage of larger social homes in many areas).

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Chapter 11: Supplementary Plans

Question 33: Do you agree with the suggested factors which could be taken into consideration when assessing whether two or more sites are 'nearby' to each other? Are there any other factors that would indicate whether two or more sites are 'nearby' to each other?

We are unclear what is being asked here or the purpose for which a site is being considered 'nearby'. Paragraph 188 is particularly unclear.

There is concern that the move from Supplementary Planning Documents to Supplementary Plans leaves a gap in this level of detail.

Question 34: What preparation procedures would be helpful, or unhelpful, to prescribe for supplementary plans? e.g. Design: design review and engagement event; large sites: masterplan engagement, etc.

This is difficult to prescribe since the intention is for Supplementary Plans only to be used in exceptional circumstances which, by definition, are non-standard. An requirement for consultation should be set out.

Question 35: Do you agree that a single formal stage of consultation is considered sufficient for a supplementary plan? If not, in what circumstances would more formal consultation stages be required?

Consultation would normally be single-stage as the Supplementary Plans are only dealing with a single issue each. However, there may be exceptions to this for more complex areas.

Question 36: Should government set thresholds to guide the decision that authorities make about the choice of supplementary plan examination routes? If so, what thresholds would be most helpful? For example, minimum size of development planned for, which could be quantitative both in terms of land use

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and spatial coverage; level of interaction of proposal with sensitive designations, such as environmental or heritage.

Yes, we think it is appropriate for the government to set these thresholds. We are not able to comment upon which approach would be the most helpful.

Question 37: Do you agree that the approach set out above provides a proportionate basis for the independent examination of supplementary plans? If not, what policy or regulatory measures would ensure this?

We agree that overall the approach appears proportionate.

Some of our members are concerned that Design Codes won't be subject to the 30-month timescale and their preparation and adoption will cause a delay after the adoption of the Local Plan, providing uncertainty and delay the delivery of much-needed housing.

Question 38: Are there any unique challenges facing the preparation of minerals and waste plans which we should consider in developing the approach to implement the new plan-making system?

No comment

Question 39: Do you have any views on how we envisage the Community Land Auctions process would operate?

A Community Land Auction is a fundamentally different way of allocating land for housing from Local Plan making. It is hard to see how it could operate within the same system. We think these ideas need further development before they are taken forward. Attempting to bring in Community Land Auctions at the same time as the new Infrastructure Levy seems particularly challenging.

Question 40: To what extent should financial considerations be taken into account by Local Planning authorities in Community Land Auction pilots, when deciding to allocate sites in the Local Plan, and how should this be balanced against other factors?

We think this should be up to local authorities to determine. The price the land is offered for is not the only financial consideration, as some sites may require more significant infrastructure, or may bring other economic benefits. In addition local authorities would want to consider non-financial factors such as sustainability,

We see widespread concern that Community Land Auctions could damage already-fragile support for housebuilding by generating a sense that local authorities are granting permission for housing on sites that are not the most suitable ones, but because they generate the best financial returns.

We do support the principle of local authorities buying land to develop it themselves and many of our members at The Housing Forum work in partnership with one another to do that.

Question 41: Which of these options should be implemented, and why? Are there any alternative options that we should be considering?

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The Housing Forum is very concerned about the large numbers of local authorities without a current Local Plan, which has happened as a result of government's proposed amendments to NPPF and the protracted delays in confirming these. The transition arrangements were proposed in December 2022 at which point the new NPPF was expected to be published in 'spring 2023'. We are concerned that moving over to a new system at a time when many authorities are already without a current adopted plan could create yet further delays. This will negatively affect plan-making and sustainable development of much-needed new housing.

We think that the government's plans for the transition need careful consideration in the light of the current situation with Local Plans being paused and withdrawn that create strong incentives for authorities to bring forward Local Plans, with the necessary resource in the Planning Inspectorate to support them in doing so. It is vital that LPAs who are well advanced with their current plan proceed under the existing arrangements rather than delay for significant period of time. Whilst the front-runners are trailing the new system, other LPAs need to continue with the existing system.

We agree with the approach that would begin with 'front runners' preparing new-style Local Plans, enabling other authorities to learn from them. It is important that this group includes a mixture of authorities with a strong track record of agreeing Local Plans, and those who have historically struggled, in order to identify any issues they may have with the new system.

We would broadly support the approach of focusing on local authorities who have the longest period since they adopted a Local Plan and expecting them to start first. However, there may be benefits to joint working with neighbouring authorities, so would suggest some flexibility for authorities who want to work in tandem. The waves of authorities should be for reinforcement only, with authorities allowed to start the process earlier if they choose to do so. Waves of only 25 authorities every six months at a time mean that it would take nearly eight years for all areas to have a new style plan, which seems under-ambitious. Allowing authorities to come forward to work on their plans earlier in order to work in tandem with their neighbours would help speed things up a bit.

We are concerned about the impact on the workload of the Planning Inspectorate and think that this needs to be bolstered and closely monitored.

The approach of forcing local authorities to consider speculative development if they lack an up to date Local Plan has been controversial. We do think, however, that strong incentives are needed to ensure a Local Plan is in place and up to date. Other ways to incentivise Local Plans (either as well or instead of speculative development) include:

- Making Local Plans mandatory.
- Ensuring that the costs to the Planning Inspectorate in the Local Plan process (both in supporting LPAs under the new system and examinations)

are borne by the Planning Inspectorate, so that there is less financial incentive on local authorities to delay their Local Plan.

- Using existing powers to put pressure on local authorities who fail to plan
- Offering additional funding for local authorities who have an adopted plan
- Making funding for infrastructure conditional on having an adopted plan

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Question 42: Do you agree with our proposals for saving existing plans and planning documents? If not, why?

We agree with these proposals.

Question 43: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

The impact on groups with protected characteristics depends very much on whether the proposals succeed in bringing forward more planning applications and more housing, especially affordable housing. If they do, then there are positive impacts for young people who are most disadvantaged by the housing shortage, alongside those on low incomes who are disproportionately women, families with children, disabled people and most BME groups.

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The organisations we represent at The Housing Forum are from across the entire housing sector – including local authorities and also housebuilders and housing associations who make planning applications. All are supportive of local authorities having up to date adopted plans. If, by bringing forward plans faster and making them simpler, more authorities have adopted plans, this should help new housing to be delivered, and therefore have a positive benefit on those who struggle most in the housing market including those listed above with protected characteristics. Conversely, if the new system is introduced in such a way as to cause further uncertainty and delay to Local Plans, this will adversely affect these groups.

Conclusion

The Housing Forum, with a membership base across the entire of the housing sector sees the benefit of Local Plans and is supportive of the Government's efforts to make the plan-making process simpler and faster. We hope that this will come as part of a wider drive to improve resourcing of local authority planning departments, driving up the quality of new housing and place-making to build the much-needed new homes and communities of the future.

We look forward to working with Government at The Housing Forum to help take forward the ambition of 300,000 new homes a year, and work towards our ambition of a **Quality Home for All**. Our key [Housing Solutions](#) set out how we think this can be achieved.

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