POETS (Planning Oxfordshire's Environment & Transport Sustainably)

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Dear Councillor

NPPF Consultation – An opportunity to be grasped

The Government has been consulting on an updated NPPF. Given the public interest in planning and housing, we thought you might be interested to see the response from POETS, which you can find at https://www.poetsplanningoxon.uk/poets-nppf-consultation-response-230924.pdf

Two of the main obstacles to providing housing to meet local need are the price of land and the over-reliance on speculative private housebuilding. POETS believe that both of these need to be addressed if housing need is to be met.

However, the model that the Government is following is largely the same as that of its predecessor. This relies on over-optimistic housing targets, and on the hope that large developers will saturate the market to bring prices down, together with an expectation that 'affordable' housing should be provided as a by-product of looser planning guidelines.

A look at history shows that this model has rarely provided much more than 200,000 dwellings pa; indeed post WW2 the only time that housing completions have been near or exceeded 300,000 was when the public sector provided roughly half. Reports by Shelter and others have shown that this model does not and cannot succeed. Public sector investment is needed to provide truly affordable housing, particularly for rent, and to bring 'competition' (including by raising energy or space standards) into the housing market. The business model of private developers clearly does not favour price lowering. The policy is thus doomed to fail.

The Government is relying on setting mandatory housing targets for local planning authorities to increase supply. Apart from the obvious flaw that planning authorities cannot force developers to build, in Oxfordshire the new targets would result in housing figures some 60% higher overall (and in S Oxfordshire double) – this following unprecedented recent housing growth.

The upshot is likely to be development in places not compliant with the government's transport, health inequality and carbon reduction objectives. Such a policy is certain to exacerbate the present highly damaging infrastructure shortfall – think under-provision for active travel and public transport as well as road maintenance – but also sewerage, surgeries and space for outdoor recreation.

Instead, we need to set evidenced targets. However, to ensure that social housing is the big priority not an occasional byproduct, the uplift in land values created by public investment needs to be captured. A few years ago the excellent Raynsford report and indeed a succession of authoritative reports have suggested there are ways to do all this at little net cost to the public purse. There would be large direct savings in housing benefit and huge indirect savings to the NHS. A very easy step would be to stop the highly subsidised 'right to buy' policy, as well as misguided government initiatives such as help to buy and stamp duty savings which, because they boost demand rather than supply, simply inflate house prices and benefit the large developers.

So, we need a reset. Planning is *not* a large part of the problem, but is a potentially huge part of the solution. We need strategic planning to achieve the government's stated transport aspirations. Local Planning Authorities should get more positive powers to ensure that development takes place in the right areas, and so focus on the overriding need to address the climate emergency, which in turn will benefit other issues such as public health.

Many thanks for reading this. We hope you find it helpful.

Yours sincerely

Noel Newson
on behalf of POETS

NB The full government consultation document can be found at
https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system