

**Planning for the Future White Paper:  
A Response**

22 October 2020

**1. Introduction**

In August 2020, the Government published the ‘Planning for the Future’ White Paper, promising a “once in a generation” reform of England’s planning system. The paper sets out the biggest changes to the current planning system since it was introduced in the Town and Country Planning Act 1947.

Link to [White Paper](#) (Web and Print versions)

**Summary of Response**

Whilst I support many of the aims of the White Paper, there is potential to work together with Ministers to improve it. I’d suggest enshrining three principles, all of which are rooted in the Conservative Party 2019 General Election manifesto and contained, to a greater or lesser extent, in the White Paper, but which could be developed.

The White Paper’s three guiding principles should be:

**I. Levelling-Up led**

- A. Housing must sit within integrated, long-term development plans for urban regeneration to prioritise the Levelling Up agenda. Our model must learn from the successes of the London Docklands Corporation as well as European states such as Holland (land reclamation) and Germany (long-term levelling up post reunification).
- B. The Housing and Planning Bill is a unique chance to focus support to regenerate Northern and Midland cities and communities which have seen population declines in the past 50 years.

**II. Environment-led**

- A. To meet mandated 2050 carbon targets, we have no choice but to prioritise low carbon construction and living. Available data shows this is primarily achievable through city living and the use of recycled land, i.e. brownfield sites. Effectively, we need a cultural shift in land use; we need a recycling culture, rather than rely on destructive greenfield development.
- B. Priority to brownfield sites is welcome, but needs to be legally mandated and accompanied by support for small as well as large sites.
- C. Enshrine good design and planning (the White Paper is very strong on this)

**III. Plan-led, community-led**

- A. Increase, not undermine, local democracy.
- B. Strengthen and simplify local plans to ensure development is led by communities.
- C. Reform the current system, for both planners and developers, to improve delivery.
- D. Nationally-set housing targets to be advisory, not mandatory. Continue to allow Exceptional Circumstances.

## 2. Planning for Development

**At the heart of planning for development is a complete revision of the planning system from a case-by-case system to one of zonation.** Areas will be designated as “growth”, “renewal”, or “protected” zones [para 2.8]. In Growth areas, permissions will automatically be applied to suitable developments [proposal 5].

The worth of this idea will be in its implementation. Done right, however, it could be a valuable policy.

### Zonation

**2.1. A developer-led system has failed this country.** We need a system where the demands of communities are prioritised, where developers build on agreed timescales to an agreed local plan. By giving outline permission to growth areas, the new zonation system could risk handing power to developers, not communities. Again, zonation should be a guide - not a rule. To reiterate, scrutiny is critical at all stages of the planning process. If a proposal is popular, it will be supported by a community. If not, members of a community should be allowed and encouraged to challenge it.

In redevelopment areas of cities, where there are large-scale brownfield sites, zoning makes significantly greater sense, especially if accompanied by comprehensive development plans and a strategic authority capable of aligning infrastructure, job creation and housing.

**Suggestion 1:** To drive ‘levelling up’ development, the government must create comprehensive redevelopment strategies for cities. This should include revisiting the successes of 1980s development corporations, providing resources for areas with high brown field availability, using tax and other incentives to make such development viable to drive results and looking to Holland and Germany as models for recycling land (Holland) and sustained, long-term development (Germany in long-term regeneration following reunification).

**Suggestion 2:** For rural and suburban areas as well as cities, provide funding for loan/grant support for brownfield clean-up to unlock stalled sites and relieve pressure on greenfield sites. Regardless of the housing market strength, many brownfield sites fail due to high upfront pre-construction capital costs. This is either due to the site being on ex-industrial land which requires significant land remediation and extensive technical assessments, or requiring infrastructure upgrades to make the site attractive to prospective developers. These high upfront capital costs ultimately result in the development being commercially unviable for the private sector.

**2.2. Too little has been done, historically, to ensure that applications come forward in the most sustainable and suitable way possible.** Instead, in recent decades, developments have often been in the form of low-density, greenfield estates, built away from towns and services. These are, by their nature, unsustainable. They are the developments that developers want, not that communities need.

The White Paper reforms threaten to exacerbate this problem by allowing zonation and development of ‘growth’ land. Growth land may well come forward on greenfield sites in order to meet national targets. We need to build communities around jobs and infrastructure in our towns and cities.

**Suggestion 3:** Create a test of sustainability at the heart of the zonation system to ensure that the plans curb greenfield development and put brownfield first.

**Suggestion 4:** Incentivise small developers to build-out smaller plots and develop funding for smaller brownfield sites. Savills’ market assessment report cites that almost half of the housing pipeline comes from small sites defined as less than 500 units. These sites are typically too small to be of interest to volume builders. The market share of SME builders has declined markedly since the global financial crisis, thanks in part to limited access to financing SMEs face, particularly at the early stages of development.

**Brownfield priority, sustainable development and levelling up.**

**2.3. Support for Brownfield sites is paramount.** [Paras 1.12 and 2.25] of the Planning for the Future White Paper, which indicate a Government desire to prioritise brownfield sites, are strongly welcome. The brownfield register has been an excellent idea and the suggestion to consolidate it with enterprise zones and simplified planning zones is strongly welcomed [2.37].

However, prioritising brownfield sites to regenerate communities and to provide an alternative to greenfield could go further. Models of housing building need to move to a sustainable approach.

**Suggestion 5:** The UK needs to put a recycling culture at the heart of house-building and land use.

**2.4. To support the prioritisation of the brownfield agenda to ensure sustainable development, the following are recommended:**

**Suggestion 6:** Prioritise house-building and infrastructure spend in areas that have seen historical population declines. These include, but are not limited to, cities such as: Newcastle, Sunderland, Hull, Liverpool, Manchester, Birmingham, and Stoke-on-Trent.

**Suggestion 7:** Ensure a legal requirement in the Bill to prioritise brownfield sites.

**Suggestion 8:** Empower authorities to be able to rule that greenfield sites may only come forward where insufficient reserves of brownfield sites are available. Additionally, allow local authorities to ban greenfield development, unless in exceptional circumstances, if sufficient brownfield sites are available.

**Suggestion 9:** Ensure brownfield clean-up funds are available for smaller sites in suburban and rural locations, as well as cities.

**Suggestion 10:** Enable exemptions from greenfield development if greenfield areas make an important contribution to the local economy, including leisure and tourism, or where it significantly enhances the natural character of an area, i.e. Areas of Great Landscape Value (this is in addition to legally protected landscapes).

**Suggestion 11:** Homes England and other public support must prioritise locations that are not commercially viable. The purpose of Homes England investment is to make sites viable by improving them, not competing with a commercial market.

**2.5. Government should reform the VAT system to support brownfield development and urban renewal.** Use incentives to drive sustainable growth. The current framework has rewarded inefficient, low-density, out-of-town development. These developments have harmed our environment, our communities, our high streets and, through car dependency, our health and fitness.

A [study](#) on the effects of reducing VAT for renovation and repair from 20 percent to 5 percent for the years from 2015-2020 projected a total stimulus effect of more than £15.1bn and 42,050 extra full-time equivalent construction jobs by the end of 2020. It also found a potential saving of up to 237,128 tonnes of CO2 as homes are improved. This is yet another example where lower tax leads to overall economic gain - and promotes a more sustainable vision of development.

**Suggestion 12:** Scrap VAT on all renovations and conversions. Potentially add a brownfield 'bonus' to drive housing completion.

**Suggestion 13:** Levy VAT on greenbelt and greenfield development to recognise the social, economic and environmental cost.

**2.6. Use existing property better.** The White Paper should create disincentives for empty homes. The UK needs an evolution in efficiency in land and housing use. Some 634,453 dwellings were vacant in England on 1st October

2018.<sup>1</sup>

**Suggestion 14:** Reopen the ‘flats-over-the-shop’ capital allowance scheme (Flat Conversion Allowance) to encourage investment in town and city centres. Redevelopment spaces in cities should be economically attractive to develop and live in, but economically painful to allow to sit idle.

**Suggestion 15:** Consider application of an Empty Property surcharge.

**Suggestion 16:** Simplify and streamline the process to allow for Government land to be used for larger-scale projects, if the proposed designs meet local design codes, i.e. former military sites which could be used for new villages or towns.

## Safeguarding Democracy

**2.7. The White Paper proposes major reforms to the plan-making and decision-making process** [para 2.3]. Among the Government’s plans are measures to shorten and reduce the length of plan-making, replace ‘unnecessary’ local policies with national guidance, and digitise the planning process [para 2.39]. These measures will be combined with a zonation system, which relies on the reformed locals plans to designate land for each zone type. [para 2.9].

**2.8. Local plans need to give local communities a voice at all stages of the planning process.** The zoning system means that once land is designated for growth, sites allocated will be given outline approval - removing much of the discretion of Councils and Councillors. This is wrong in principle. We need to strengthen, not weaken community involvement. If we want to make intelligent development popular, we need to reinforce local democracy, not undermine it.

**Suggestion 17:** Local communities should be permitted to scrutinise development at *all* stages of the process; not simply during plan-making. Zonation, whilst potentially useful, should be a guide - not a rule.

**Suggestion 18:** Devise new methods of consultation to enable local democracy through the planning process. The plans should grant time and ability to oppose planning applications and prevent developers from gaming the system.

**2.9. Reforms to shorten the consultation process and damage local democracy** [para 3.16]. We need to be strengthening local democracy, not weakening it. ‘Streamlining’ or ‘fast-track’ must not become a byword for removing consultation.

**2.10. Plan-making, however formulated, must put community first.** That includes MPs, local Councils, and individuals. I welcome changes to enable greater accessibility in the planning process and again call for the reforms to put greater emphasis on enabling local voices, as well as planners, to be heard.

**2.11. Engagement in the Planning Process** [pp 20-21]. It is naive to think that people will primarily engage in the planning process when Government wants them to, i.e. at the start. Often people engage when open spaces are threatened by developers. Human nature needs to be understood by MHCLG, not ignored. It is unhelpful for the White Paper to claim that the current consultation process is meaningless [p. 22]. It is also unclear what the White Paper defines as ‘genuine community involvement’ [p. 22].

**Suggestion 19:** Grant Town and Parish Councils statutory consultee status. Enshrine local communities’ local plans as the bedrock of planning decisions.

**2.12. We need to give local councils and councillors more responsibility, not less.** Democracy comes foremost in the development of local plans, and the reforms must ensure that any national outsourcing of development policies does not undermine local voices.

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<sup>1</sup> Dwelling Stock Estimates: 31 March 2018, England, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/803958/Dwelling\\_Stock\\_Estimates\\_31\\_March\\_2018\\_England.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/803958/Dwelling_Stock_Estimates_31_March_2018_England.pdf) (Accessed 19 October 2020)

**Suggestion 20:** Continue to allow local democracy and local decision-making by supporting Local Authorities to set their own targets, rather than have them centrally imposed. Continue to allow Exceptional Circumstances for communities that wish to produce their own methodology, prioritise local need, or define themselves as in unique circumstances.

2.13. **The White Paper argues that more land will be made available for development** [p. 25]. It does not explain how this will be squared with concern for widespread greenfield development in urban and suburban locations as well as density limitations in suburban areas.

2.14. **Plan-making, as a whole, should encourage councils to develop housing strategies for local needs rather than simply plans which meet government targets.** Top-down targets have too often been undeliverable, unpopular and damaging. Too often, there is little confidence in these targets and they do little to tackle the needs of those on local housing registers. I am calling for a shift in focus from a national house building target [p. 19], to building the types of homes local areas need most, sustainably. This includes supporting the community, social homes, and specialist accommodation, in a mixture of private and public development; avoiding a top-down figure.

**Suggestion 21:** Provide an additional revenue fund to Local Authorities' Planning departments. Some Local Authorities (LAs) lack sufficient resources to quickly and effectively plan and deliver new housing in their jurisdictions, whilst ensuring quality standards and delivering wider economic benefits, for example improving connectivity). This insufficiency has resulted in plan-making being slow, expensive, oftentimes delayed, and sub-optimal from a wider benefits perspective.

Under this option, funding could be used to support Local Authorities to give their planning departments more capacity to deliver plans that incorporate spatial development strategies, undertake proactive and capability-intensive interventions in the land market, such as land assembly and Compulsory Purchase Orders when necessary, review development applications promptly, engage their communities on the design and mix of new homes; and ensure homes that are planned for are built out on time.

## Landbanking and the Construction Industry

2.15. **To fix under-supply, we need to start at the root cause.** Changes to increase the speed of delivery are welcome [para 2.58]. As identified by the White Paper and the Letwin Review, developers are building deliberately slowly to increase value. Despite 80 percent of residential applications being granted, between 2010 and 2017 nearly half of all permissions remained unbuilt.<sup>2</sup> There are currently up to 1 million permissions not yet completed.<sup>3</sup>

**Suggestion 22:** Supporting Local Authorities to directly deliver housing. Local Authorities' role in delivering new housing goes beyond using their planning powers. LAs, Housing Associations, and local development corporations (where established) can directly impact housing delivery by developing new market rate housing for sale or private rent, as well as affordable housing. Under this option, the Fund would be used to provide LAs, housing associations, and local development corporations with capital funding to deliver housing via a range of possible mechanisms.

2.16. **We need to incentivise building and disincentivise landbanking.** The Bill should include further strategies to complement the White Paper.

**Suggestion 23:** Council tax to be levied at an agreed date after planning permission is granted to disincentivise landbanking of undeveloped sites with planning permissions. Alternatively, a plot tax may be levied on unfinished plots after a given date. This will either incentivise developers and speed up

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<sup>2</sup> Housebuilders hold the key to homes crisis, Liam Halligan, The Telegraph, 29 August 2020, <https://www.telegraph.co.uk/business/2020/08/29/housebuilders-hold-key-homes-crisis/> (Accessed 15 September 2020)

<sup>3</sup> Councils say 1m homes given go-ahead but not yet built, Peter Walker, The Guardian, 19 February 2020, <https://www.theguardian.com/society/2020/feb/20/councils-say-1m-homes-given-go-ahead-but-not-yet-built> (Accessed 15 September 2020)

completions or offer financial compensation to a local authority.

**Suggestion 24:** Empower Councils to withdraw permission if building progression and finishing dates are not complied with.

### 2.17. **We need to create a more sustainable construction sector to allow for more sustainable housing delivery.**

There has been a significant decline in the numbers of SME building companies since the financial crisis<sup>4</sup>. This causes a dependence on larger developers to meet the UK's construction need, and gives large developers undue influence over housing supply. In addition, the construction industry needs investment to invigorate an industry with falling productivity and a declining workforce.

**Suggestion 25:** Expand training in the construction sector. The UK has historically faced low levels of investment in skills in the construction sector, which has contributed to skills shortages in the industry in some key trades and in some regions. This is due to worsen over the next ten years as a higher proportion of the construction workforce face retirement age in comparison to new joiners, and could result in even lower rates of housing delivery.

**Suggestion 26:** Improve productivity and innovation in the construction sector. The housebuilding industry is less productive than the average industrial-sector within the wider economy. This is partly due to low levels of investment in innovation, such as modern methods in construction and off-site housing construction. On the back of the publication of the Farmer (2016) report<sup>5</sup>, *Modernise or Die*, as well as the findings of Cardiff University's (2017) report<sup>6</sup>; it was found that innovation in the construction sector has a role to play in boosting productivity and accelerating housing delivery.

Consider support to provide funding and/or financing to local development firms and SMEs to boost innovation in the sector. This could take the form of revenue funding/financing to research and develop (R&D) innovative methods to construction, or capital funding/financing to invest in the technology or equipment required to undertake new and innovative construction methods. The outcome of this option would be to boost productivity in the construction sector, resulting in faster and more efficient housing delivery and sectoral GVA growth.

**Suggestion 27:** Provide direct loan/grant support for custom and self-build homes. Alongside SME firms, custom and self-build homes enable people to choose the design and layout of their home, while a developer or specialist firm may support to find the site, secure planning permission and build the property. Custom and self-build homes are generally built more quickly and to a higher quality than homes delivered via traditional private and public markets. Under this option, funding would be used to provide loan and/or grant support directly to home or land owners for the purpose of building custom and self-build homes.

2.18. **Plan making: reforms to digitize and make clearer the planning process are welcome.** Any measures which boost access to the planning process, such as making plans accessible online, are welcome.

## 3. Beautiful and Sustainable Places

3.1. The White Paper sets out several welcome reforms to make "beautiful places" – including a national model design code, and locally produced design guides. In growth areas, masterplans and site-specific codes will be required as a condition of permission. The paper also proposes to widen permitted development in accordance with design codes and create a fast track for beauty.

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<sup>4</sup> Reversing the decline of small housebuilders, Housebuilding federation, 2017, [https://www.hbf.co.uk/documents/6879/HBF\\_SME\\_Report\\_2017\\_Web.pdf](https://www.hbf.co.uk/documents/6879/HBF_SME_Report_2017_Web.pdf) (Accessed 19 October 2020)

<sup>5</sup> The Farmer Review of the UK Construction Labour Farmer, M, October 2016, <http://www.cast-consultancy.com/wp-content/uploads/2016/10/Farmer-Review-1.pdf> (Accessed 19 October 2020)

<sup>6</sup> More | Better: an evaluation of the potential of alternative approaches to inform housing delivery in Wales, Green, E and Forster W, 24<sup>th</sup> May 2017, <http://orca.cf.ac.uk/98055/7/MORE%20BETTER%20report%20FINAL%20Ed%20Green%20revD.pdf> (Accessed 19 October 2020)

3.2. **Carbon Targets.** Critically, the White Paper expects [proposal 18] new homes to produce ‘significantly fewer’ emissions, whilst [p. 21] also saying that it must “ensure the planning system supports our effort to combat climate change and maximise environmental benefits” and support Net Zero 50 [para 3.1].

Yet house-building targets, focused on freeing up greenfield sites, appear to flatly contradict these important and legally-mandated aims.

Research provided by the House of Commons Library shows that homes, once built, in urban areas are significantly less carbon emitting than houses built in suburban and rural areas. Eight areas with the lowest emissions per capita are in London.<sup>7</sup> Eight of the ten worst areas are in rural and Island communities.<sup>8</sup> The Government’s plans for suburban and rural house-building will undermine its carbon targets and may, now or in a few years, render illegal much of the Government’s housing plans.

**Suggestion 28:** House-building must align with the UK’s binding Paris Climate Accords carbon-neutral and carbon-efficient obligations as well as the Government’s ‘world-leading’ commitment to net-zero by 2050 carbon emissions [p. 21]. The most carbon-efficient housing and locations, should, by law, be prioritised. This implies a significant focus on city, as opposed to suburban and rural, development. It also means that to provide even modest numbers of housing in suburban and rural areas, brownfields sites must be legally prioritised and incentivised.

### **Building Beautiful**

3.3. **Changes to include design and style guidelines are welcome.** They must be designed with genuine local input, and adequately enforced. Many areas have unique architectural styles that must be respected and revitalised after years of neglect.

**Suggestion 29:** Allow Local Authorities to prioritise local building styles and materials.

3.4. **Building beautiful represents both built and natural beauty** - in our landscape and quality of life.

### **Protecting the Natural and Historic Environment**

3.5. The white paper introduces new measures to improve sustainability, building on the Environment Bill and Nature Recovery Strategies. The plans will speed up the process of assessing environmental impact.

3.6. **UNESCO<sup>9</sup> Biosphere should be protected.** Biospheres reserves are learning spaces for sustainable development which are designated by the UN. They are intended to foster sustainable interaction with the environment in conservation, social and environmental contexts. There is no legal recognition for UN Biosphere or legally binding constraints on development in areas that are designated as UN Biospheres.

**Suggestion 30:** UN Biospheres in the UK should be recognised in planning law. Include the principles of Biosphere designation in law for recognised reserves. Apply the same principles as either National Park or AONB designation to UN Biospheres.

## **4. Planning for Infrastructure**

4.1. **The White Paper proposes to scrap so-called Section 106 payments** (fees levied by local authorities to mitigate the impact of a development on infrastructure or contribute to affordable homes) and Community Infrastructure payments. They will be replaced by a centrally set Infrastructure Levy. The Levy will apply to the market value of a property at the point of occupation. It will also include a new value-based minimum threshold below which the levy is not charged. Critics say the paper does not set out plans for broader investment in social

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<sup>7</sup> House of Commons Library (HoCL) data 2010-098a

<sup>8</sup> Ibid,

<sup>9</sup> United Nations Educational, Scientific and Cultural Organization (UNESCO)

housing.

Alongside the White Paper are proposals to extend the temporary increase in the development size threshold for affordable housing.

### **The Infrastructure Levy**

**4.2. The new Infrastructure Levy must be utilised as a critical intervention in the affordability crisis.** The current planning system is deeply flawed and has failed to serve those in need of affordable homes. There is a need for 340,000 homes each year to 2031 of which 145,000 “must be affordable.”<sup>10</sup> However, just 57,485 affordable homes were delivered in 2018-19.<sup>11</sup>

**Suggestion 31:** Vary the MHCLG affordability criteria to allow local Housing Associations to ensure affordable housing in a given local area is actually affordable.

**4.3. The levy should be more resilient to landbanking and other loopholes which developers may utilise to avoid payment.** The new levy is applied on the point of occupation. If landbanking continues, permissions may be granted but will fail to see planning uplift converted into community assets. It is vital that infrastructure comes prior to development.

**Suggestion 32:** To discourage landbanking, enable upfront payment of the Infrastructure Levy to Authorities; enabling infrastructure and affordable homes to come forward faster, prior or alongside housing development.

**Suggestion 33:** Allow the levy to be raised regardless of whether a local planning authority has opposed the development or not.

**4.4. Foremost, the new levy must become a force for good by better supporting the delivery of affordable homes.** Councils should receive compensation even if they oppose development; and funding for starter/key worker/Council housing must be available to all councils and housing associations. More funding should be available for social housing for local people, young and old.

**Suggestion 34:** Scrap the *automatic* right-to-buy and find more cost-effective ways to support home ownership. For example, rent-to-buy schemes. These schemes support homeownership aspirations by allowing young renters to pay below market rates for housing with a chunk of their money going to a house deposit. For one rent-to-buy [policy](#), over a million people could move into home ownership.

**Suggestion 35:** In London and other major cities, tighten rules around foreign buyers who leave property empty and ban offshore shell purchases.

**4.3. These reforms are a generational opportunity to reform the delivery of specialist accommodation.**

**Suggestion 36:** Support specialist housing delivery by introducing a multi-million pound ‘bungalow fund’ to convert bungalows into two or more housing units. This would encourage housing associations and councils to buy up bungalows, by definition very low-density housing, with assumed planning consent for adding a storey, to create two properties. Thus, population density in towns and villages, where there are already services, is gradually increased.

### **Infrastructure delivery**

**4.5. The current ‘Green Book’ Treasury investment calculation means infrastructure delivery is unequally provided across the UK.**

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<sup>10</sup> [National Housing Federation and Crisis \(Heriot-Watt University\)](#)

<sup>11</sup> Affordable Housing Supply: April 2018 to March 2019 England, ONS, 20 November 2019, <https://www.gov.uk/government/statistics/affordable-housing-supply-in-england-2018-to-2019> (Accessed 22 September 2020)

**Suggestion 37:** It should be reformed to ensure infrastructure is fairly provided across all authorities.

**4.6. Plans including housing targets should only come forward when infrastructure requirements and plans are also agreed.** The Standard Method of calculating housing need, which the White Paper proposes to integrate into a standard housing requirement, currently does not consider infrastructure provision or supply constraints.

Pressured to meet this housing need target, local authorities risk creating communities without the jobs, infrastructure, and services to guarantee quality of life and economic sustainability. An ageing population in a number of authorities will put pressure on the provision of health and social care.

**Suggestion 38:** Local plans should be used to enable an authority-wide review of infrastructure, ensuring that the level of development proposed by housing targets can be supported by local infrastructure.

**4.7. Government departments pass land to councils too slowly.** As part of the brownfield-first agenda, land owned by the Government and unused for a specified period of time should be made available to local authorities to take forward development potential.

**Suggestion 39:** Ensure that permissions are conditional on concurrent infrastructure provision, as well as meeting area and design guides. Housing should only come forward where confirmation exists that sufficient infrastructure will be in place to support the development. Where the current tests of sustainability and individual scrutiny of applications will be replaced, it is essential that any housing target is sufficiently supported by an equal, appropriate level of infrastructure.

**Suggestion 40:** Relaxation of Green Book rules to enable development of Government-owned land and create, *where supported by local communities*, new towns and new villages. These should especially take place where there are good transport links.

## 5. The new Standard Method

**5.1. The White Paper sets out long term changes to the standard method of calculating housing need.** The reforms will create a future Standard Method which for the first time would set a binding housing requirement as a means of distributing the national housebuilding target. This future method would build on the Standard Method proposed in the 'Changes to the current planning system' consultation, and unlike current iterations, consider land constraints and other factors.

**5.2. A binding housing requirement undermines local democracy and harms exceptional constituencies.** In any iteration, a compulsory central formula will likely be flawed when applied to the unique circumstances of some authorities.

**Suggestion 41:** Local authorities must be allowed, indeed supported, to develop a case for exceptional circumstances, based on a sensitive and local assessment, not randomised, algorithmic national targets. Furthermore, a binding requirement undermines the democratic mandate to choose a lower number target. If a valid lower assessment of need is supported by evidence and local communities, it should also be supported by the Government.

**Suggestion 42:** Housing targets must be advisory, not mandatory.

**5.2. The current Standard Method is flawed.** The current Standard Method and associated short term changes are flawed and should be radically altered before integration into a binding housing requirement. Changes set out in the 'Changes to the current planning system' consultation to the 'Standard Method' algorithm of calculating local need exacerbate an already flawed model. The changes undermine the levelling up agenda, hit rural areas hardest, and fail to consider idiosyncratic factors in unique constituencies.

## Summary

6.1. Whilst I support many of the aims of the White Paper, there is potential for improvement. The White Paper's three guiding principles should be:

**Levelling-Up led**, to deliver our long-term plans for the country,

**Environment-led**, to ensure our plans are legal and look to the long-term, and;

**Community-led**, to ensure that re-development is embraced by communities

**Ends**