

Letter from a Resident of Hellingly Ward and Herstmonceux Parish

Dear Mr Gove,

Welcome to your new job.

I would like to put forward some ideas which could help current housing problems.

I am an organic farmer and also work part time for a local organic dairy farm, Hook and Son, who sell raw organic milk and dairy products from grass-fed cows. I was previously a geoscientist in the oil industry.

I have no qualifications in this area but over the last decade or so have become increasingly involved in planning issues in my local district, Wealden in East Sussex.

Our district has suffered from overdevelopment, mainly on greenfield sites, for many years yet there is still a shortage of affordable housing for local people. Our council housing register, currently 800, has not changed significantly in many years despite thousands of new private houses being built, many of which are supposed to be affordable.

There are now high levels of frustration and despondency by the vast majority of residents here, myself included, due to overdevelopment, its associated environmental destruction and lack of affordable housing.

This is a failure of policy by government and your party which is costing your party votes in both local and national elections.

My suggestions are as follows:

1. Keep local plans but make them more democratic. At present there is far too much central government control, particularly over housing numbers which are far too high in our district. This means developers not local people have all the power and there is rampant overdevelopment. Give the power to control housing numbers to the local authority.
2. Increase not for profit housing supply. Council houses, which are more affordable than private housing, should be supported more by central government.
3. Cap the value of development land. Agricultural land here is £10,000 per acre but with planning permission this increases ten fold to £100,000 per acre. Development land should be capped at 1.5 or maximum 2.0 times agricultural value. This would decrease the cost of new homes substantially and stop speculation.
4. Greenfield development should be a last resort, not a first choice as it is currently here. The loss of greenfield land adds to the three environmental crises we are facing: food security, biodiversity and climate, not to mention people's well-being. The vast majority of new housing should be on brownfield sites. Build upwards, not outwards!
5. The local health service should be a statutory consultee for planning permissions. Our hospitals, GP's and dentists are overstretched due to the influx of new people here. They should have the ability to say no to development and population increase until new health capacity is added.
6. More money should be paid to local infrastructure by developers. The Community Infrastructure Levy (CIL) should be increased. Currently developers are far too profitable and local infrastructure is far too underfunded.

7. New homes should be carbon neutral. Reinstating the policy on this which was shelved by David Cameron's government.

8. Tackle under-occupation. At present over half of private homes in our district are under-occupied. It's been estimated that there are 25 million empty bedrooms nationwide. This is a huge reservoir of unused accommodation which is very wasteful. I suggest a stick and carrot approach: Reform the council tax to more accurately reflect the size of the property, penalise second home owners more and encourage more attractive retirement housing.

These suggestions reflect my considered opinions, after many years of involvement in the local planning process. I hope you will give them due consideration in formulating your new planning and housing policies.

And this is the reply from the Mr Gove MP and Minister for [Department for Levelling Up, Housing and Communities](#). And for information [Planning guidance: letters to chief planning officers](#)

By Email:

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Our Ref:12759428

Your Ref:

Dear Mr

Thank you for your email of 1 October to the Rt Hon Michael Gove MP, setting out a number of proposed changes to national planning policy. We have been asked to reply on behalf of the Secretary of State and we would like to say that we are always interested to hear fresh perspectives on how the planning system can be improved. We will address a number of the key points you have made in turn.

1. Making local plans more democratic and giving power to control housing numbers to the local authority.

The Government is very conscious of the effect that development can have on local communities and our environment. Through our planning reforms we have set out that local and neighbourhood plans are fundamental to giving local people more power over planning decisions that affect them. Equally, there is no doubt we have not been building enough homes to meet our country's need for too long. To help achieve our manifesto commitment to deliver 300,000 homes annually by the mid 2020's, and one million homes over this Parliament, it is important that local authorities plan positively to meet their full housing needs.

Our National Planning Policy Framework introduced the standard method for calculating local housing need which gives a starting point for local authorities in identifying the housing need in their area. It is important to emphasise, however, that local housing need does not set a target for the number of homes to be built. Local authorities take into account land supply and constraints (such as Green Belt) and cooperation with neighbouring authorities on whether need should be shared,

before deciding their housing requirement. This recognises that not everywhere will be able to meet their housing need in full.

We understand that local communities must be at the heart of the planning process. It is a key aspect of local democracy, and this is very much in our minds as we consider the way forward on planning reform. With plans taking on average 7 years to adopt, it currently takes too long to adopt a Local Plan. We hope to make it easier for local authorities to put meaningful plans in place. We also hope to be able to create a planning system that ensures the users are continuously engaged throughout the processes.

2. Increase not for profit housing supply. Council houses, which are more affordable than private housing, should be supported more by central government.

The Government is committed to increasing the supply of affordable homes and we are investing over £12 billion in affordable housing over five years, the largest investment in affordable housing in a decade. This includes the new £11.5 billion Affordable Homes Programme which will provide up to 180,000 new homes across the country, should economic conditions allow. We are committed to delivering affordable homes of a variety of tenures so we can support a range of people in different circumstances and stages in their lives. Since 2010, we've delivered over 542,400 new affordable homes, including over 382,300 affordable homes for rent, of which over 149,400 homes for social rent. The new Affordable Homes Programme will deliver more than double the social rent than the current programme, with around 32,000 social rent homes due to be delivered. We are also keen to see local authorities playing a key role in the delivery of this programme, alongside Housing Associations, and we have given councils a comprehensive range of tools to deliver a new generation of council housing. This includes a package of reforms that will give councils more freedom on how they spend the money they receive from selling homes through the Right to Buy to help them build more council homes.

We also abolished the Housing Revenue Account borrowing cap in 2018, enabling local authorities to borrow for building. We understand that local communities must be at the heart of the planning process. It is a key aspect of local democracy, and this is very much in our minds as we consider the way forward on planning reform. With plans taking on average 7 years to adopt, it currently takes too long to adopt a Local Plan. We hope to make it easier for local authorities to put meaningful plans in place. We hope to be able to create a planning system that ensures the users are continuously engaged throughout the processes.

3. Greenfield development should be a last resort, not a first choice as it is currently here. The loss of greenfield land adds to the three environmental crises we are facing: food security, biodiversity and climate, not to mention people's well-being. The vast majority of new housing should be on brownfield sites. Build upwards, not outwards!

The Government shares your concern to preserve food-growing and other greenfield land from harmful and unnecessary development. As well as protecting National Parks, Green Belt, Areas of Outstanding Natural Beauty and other designated land, the Framework expects local authorities to recognise the character and beauty of the countryside more widely; including the benefits from natural capital and eco-system services, trees, and the best and most versatile agricultural land. If development of some agricultural land is found to be essential, poorer farmland should be preferred.

The Framework also makes clear that planning policies and decisions should minimise the impacts on biodiversity, and provide net gains. Moreover, the forthcoming Environment Bill proposes to

introduce a 'biodiversity net gain' requirement designed to ensure wildlife habitats are left in a measurably better state than they were before development takes place. All these important protections mean that we can deliver our commitment to building more homes in an environmentally sustainable way. We want all developers to ensure that this happens.

Turning to the issue of brownfield land, we have set out, in the National Planning Policy Framework, that local authorities should put suitable brownfield and under-used land to good use and prioritise brownfield wherever practicable. Each authority now publishes a register of brownfield in its area which it considers suitable for new homes, and developable land for over a million homes has been identified. We are supporting building on brownfield land with a range of funding packages, including the £400 million Brownfield Fund. At the same time, brownfield sites vary greatly in their suitability for re-use. Local authorities, in consultation with local people, are best placed to identify sites and to decide if they are suitable to redevelop.

4. More money should be paid to local infrastructure by developers. The Community Infrastructure Levy (CIL) should be increased. Currently developers are far too profitable and local infrastructure is far too underfunded.

The Government knows how important it is to local communities that housing is supported by the provision of infrastructure. The National Planning Policy Framework asks local planning authorities to plan for the required mix of housing and supporting infrastructure, including roads and transport links, through the Local Plan process. Contributions from developers play an important role in delivering the infrastructure that new homes and local economies, require, and local planning authorities use the Community Infrastructure Levy (CIL) and Section 106 planning obligations to capture a proportion of the increases in land value that occur as a result of planning permission being granted.

The proposal to create a new Infrastructure Levy, as set out in our 'Planning for the Future' White Paper, will support a more streamlined and accessible planning system. The new Levy will raise at least as much value as is currently captured through CIL and section 106 and will continue to be collected and spent at the local level, on priorities including infrastructure and affordable housing.

5. New homes should be carbon neutral. Reinstatement the policy on this which was shelved by David Cameron's government.

The Government remains committed to meeting its target of net zero emissions by 2050 and recognises the important contribution that the energy efficiency of buildings has to make in meeting it. We must ensure that the energy efficiency standards we set through the Building Regulations for new homes put us on track to meet the 2050 target. By improving energy efficiency and moving to cleaner sources of heat, we can reduce carbon emissions and keep energy costs for consumers down now and in the future. The challenges involved in improving the energy efficiency of our buildings and reducing carbon emissions are not insubstantial. However, new build is an area where we can and must maintain momentum.

From 2025, the Future Homes Standard will ensure that new homes produce at least 75% lower CO₂ emissions compared to those built to current standards. In the short term this represents a considerable improvement in the energy efficiency standards for new homes. Homes built under the Future Homes Standard will be future proofed with low carbon heating and high levels of energy efficiency. They will be 'zero carbon ready', which means that in the longer term, no further retrofit work for energy efficiency will be necessary to enable them to become zero-carbon homes as the electricity grid continues to decarbonise. We must ensure that all parts of industry are ready to meet

the Future Homes Standard from 2025, which will be challenging to deliver in practice, by supporting industry to take a first step towards the new standard.

In 2021 we will introduce an interim uplift in Part L standards that delivers a meaningful reduction in carbon emissions and provides a stepping-stone to the Future Homes Standard. From 2021, new homes will be expected to produce 31% less CO2 emissions compared to current standards. This will deliver high-quality homes that are in line with our broader housing commitments and encourage homes that are future proofed for the longer-term.

Thank you, once again, for writing in on these important matters.

Yours sincerely

The Planning Policy and Reform Correspondence Team