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Consultation outcome

Government response to the local housing need proposals in “Changes to the current planning system”

Updated 16 December 2020

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Introduction

On 6 August 2020, the government published 'Changes to the current planning system'. The consultation paper set out four policy proposals to improve the effectiveness of the current system:

- changing the standard method for assessing local housing need, to plan for the delivery of 300,000 new homes a year and plan for more homes in the right places;
- securing First Homes, sold at a discount to market price for first time buyers, including key workers, through developer contributions;
- temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing, to up to 40 or 50 units, to support SME builders as the economy recovers from the impact of the COVID-19 pandemic; and
- extending the current Permission in Principle to major development so that landowners and developers can secure the principle of development for housing on sites without having to work up detailed plans first.

The consultation closed on 1 October 2020.

This government response provides a response to the first of the four consultation proposals – changes to the standard method for assessing local housing need (the 'standard method').

We are carefully considering the responses to the other proposed policy changes covered in this consultation. In doing so, we will assess whether the small sites threshold and extending Permission in Principle are best addressed in the context of our proposals for wider reform. We will be responding to proposals to secure First Homes through developer contributions in the short term in the New Year.

The detailed conclusions set out in this response have been informed by the responses to the questions directly relating to the standard method, and the responses relevant to the standard method in the question on the equality impacts relating to the overall impacts of the proposals.

Overview

There were 2,398 responses to the Changes to the current planning system consultation. Not all respondents answered every question. All responses have been analysed for the changes to the standard method policy questions (questions 1 to 7) and the equality impact question (question 35) and given full consideration in the preparation of this response. We are grateful to everyone who took the time to respond. The table below provides a breakdown of the general consultation responses by type of respondent.

Type of consultation respondent	Number of responses
Local Authority (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)	321
Government / Arms-length body	9
Non-Governmental Organisation (NGO)	29

Type of consultation respondent	Number of responses
Community Group / Parish Council / Neighbourhood Forum	507
Developer / construction	68
Landowner	1
Land agent / Land promoter	10
Architecture / Urban design	5
Housing charity / campaign	22
Housing Association	34
Business / Trade body	28
Planning / development consultancy	44
Digital technology organisations	0
Infrastructure provider	2
Other	138
Organisation total	1,218
Personal / independent responses	1,180
Total number of responses	2,398

This document provides a summary of the consultation responses received. It does not attempt to capture every point made. It sets out the proposed changes the government is making, having taken the consultation responses into account. Where the government has decided not to make further changes to the consultation proposals, the reasons are explained.

Proposed changes to the standard method for assessing local housing need

We do not propose to proceed with the specific changes to the standard method that were consulted on. The reasons for this are set out below. Instead we will proceed with a reformed standard method which reflects our commitment to levelling up and enables regeneration and renewal of our urban areas as we recover from the COVID-19 pandemic.

In Changes to the current planning system, the government set out the importance of building the homes our communities need and putting in place measures to support our housing market to deliver 300,000 homes a year by mid-2020s. We set out that our proposed changes to the standard method were based on overarching principles as stated in paragraph 17 of the consultation. These were ensuring that the new standard method delivers a number nationally that is consistent with the

commitment to plan for the delivery of 300,000 new homes a year, a focus on achieving a more appropriate distribution of homes, and on targeting more homes into areas where there are affordability challenges. We remain committed to these principles.

We have listened carefully to the feedback on our proposals, within the consultation and outside of this, including in Parliament, through discussions with stakeholders and in the media, have heard concerns that the distribution of need was not right. In particular, we heard that too much strain was being put on our rural areas and not enough focus was on the renewal of our towns and cities.

In addition, since we published the consultation, the way that the country lives, works and travels continues to change more rapidly than at any time since the war. This has implications, for example, on demand for commercial and retail floorspace in our cities and urban areas. We want our towns and cities to emerge from the pandemic renewed and strengthened – more beautiful, more healthy, more environmentally sustainable and more neighbourly places, with greater public and private investment in urban housing and regeneration.

More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places. But harm or homes is not a binary choice. We can plan for well designed, beautiful homes, with access to the right infrastructure in the places where people need and want to live while also protecting the environment and green spaces communities most value. If we do this well, we can achieve all this whilst giving a new generation the chance to access the homes they deserve. The same chances generations before them were given. This is a matter of social justice and inter-generational fairness. It would be wrong for our built environment to respond only to the needs of older, wealthier people. We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.

A number of the concerns we have heard showed some misunderstanding about what was being proposed.

Many respondents to the consultation were concerned that the 'targets' provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF (<https://www.gov.uk/guidance/national-planning-policy-framework/2-achieving-sustainable-development#para011>) or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints. In order to make this policy position as clear as possible, we will explore how we can make changes through future revisions to the National Planning Policy Framework, including whether a renaming of the policy could provide additional clarity.

Next steps

Proposal

Having taken the responses into account, we have decided the most appropriate approach is to retain the standard method in its current form. However, in order to meet our principles of delivering more homes on brownfield land we will apply a 35 per cent uplift to the post-cap number generated by the standard method to Greater London and to the local authorities which contain the largest

proportion of the other 19 most populated cities and urban centres in England. This is based on the Office for National Statistics list of Major Towns and Cities, ranked in order of population size using the latest mid-year population estimates provided by the Office for National Statistics.

As at the date of this government response and in order of size beginning with the largest as per the 2019 mid-year estimates (latest estimates), these places are: London, Birmingham, Liverpool, Bristol, Manchester, Sheffield, Leeds, Leicester, Coventry, Bradford, Nottingham, Kingston upon Hull, Newcastle upon Tyne, Stoke-on-Trent, Southampton, Plymouth, Derby, Reading, Wolverhampton, and Brighton and Hove.

The 20 authorities which contain the largest proportion of the city or urban centre's population will have the 35 per cent uplift applied. The cities and urban centres list was objectively determined using national datasets provided by the Office for National Statistics to determine the urban local authorities which contain the largest proportion of the 20 most populated cities and urban centres in England.

Our rationale for doing this is as follows.

Rationale for cities and urban centres uplift

In relation to the cities and urban centres uplift, we have heard representations that we can do more to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method. There are three strong reasons for doing so. First, building in existing cities and urban centres ensures that new homes can maximise existing infrastructure such as public transport, schools, medical facilities and shops. Second, there is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge. Utilising this land allows us to give priority to the development of brownfield land, and thereby protect our green spaces. And third, our climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel. We have heard support for these objectives. We have chosen a 35 per cent uplift to ensure consistency with the government's Manifesto commitment to see 300,000 homes per year delivered by the mid 2020s. The Government is also keen to ensure that all areas plan for the right, size, type and tenure of homes, and in particular to ensure that appropriate numbers of family homes come forward, and would encourage these all places, but particular the urban centres, to consider carefully how they deliver the right mix for their communities. Getting this mix right will maximise the beneficial impact that the delivery of more homes can bring. For example, planning for the right size homes can help address affordability and planning for specialist housing such as older peoples' housing can have the knock-on effect of freeing up much needed family homes. In addition, planning for more routes into home ownership, such as First Homes and Shared Ownership, will help younger people make that important first step onto the housing ladder.

The increase in the number of homes to be delivered is expected to be met by the cities and urban centres themselves, rather than the surrounding areas. In considering how need is met in the first instance, brownfield and other under-utilised urban sites should be prioritised to promote the most efficient use of land. Development should align with the character of local neighbourhoods in urban areas and support the building of green homes. This is to ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the services they rely on, making travel patterns more sustainable. Local planning authorities should co-operate on that basis, notwithstanding any longer-term proposals set out in the Planning for the Future White Paper which explain that we intend to abolish the Duty to Cooperate. We will set out any decisions and any associated proposed implementation following from consideration of the responses to that consultation in due course

This cities and urban centres uplift is being implemented through revisions to the relevant planning practice guidance.

Rationale for retaining current approach

In addition, and having reflected on the points made through the consultation, the government has concluded that this approach will provide stability and certainty for plan-making and decision-making, so that local areas can get on and plan based on a method and level of ambition that they are familiar with. We know that change can cause uncertainty and delays and after a year of uncertainty due to COVID-19 it is particularly important that the standard method does not act as a barrier to planning for the homes needed. In particular:

- We will continue to use the 2014-based household projections. The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections.
- The government wants to ensure that work continues to progress Local Plans through to adoption as soon as possible and, at a minimum, by the end of 2023 to help ensure that the economy can rebound from COVID-19.
- We will continue to specify that the most recent affordability ratios should be used ensuring relevant market signals continue to play a role.
- The government will retain the provision that caps increases in local housing need in each planning cycle at 40%, except for in areas where the cities uplift is applied.

London

It is clear that in London, in the medium term, there will need to be a much more ambitious approach to delivering the homes the capital needs. The Secretary of State for Housing, Communities and Local Government expects to agree the London Plan with the Mayor shortly. This new plan, when adopted, will set London's housing requirement for the next 5 years. The local housing need uplift we are setting out today will therefore only be applicable once the next London Plan is being developed. In order to support London to deliver the right homes in the right places, the government and Homes England are working with the Greater London Authority to boost delivery through the Home Building Fund. Homes England has been providing expertise and experience to support the development of key sites in London. Sites like Old Oak Common, Nine Elms and Inner East London provide opportunities to deliver homes on significant brownfield sites. The Secretary of State for Housing, Communities and Local Government will consider giving Homes England a role in London to help meet this challenge, working more closely with the Greater London Authority, boroughs and development corporations to take a more direct role in the delivery of strategic sites in London and the preparation of robust bids for the new National Homebuilding Fund.

Transition

In providing the important clarity and certainty to enable places to rapidly progress with their plans, and making no changes to the existing standard method, there will be no direct impact on the majority of authorities. These should continue to bring forward plans as quickly as possible. However, there will be transitional arrangements for those cities and urban centres delivering the additional cities and urban centres uplift. From the date of publication of the amended planning practice guidance which implements the cities and urban centres uplift, authorities already at Regulation 19[2], will have six months to submit[3] their plans to the Planning Inspectorate for examination, using the previous standard method[4]. In recognition that some areas will be very close to publishing their Regulation 19[5] plan, these areas will be given three months from the publication date of the revised

guidance to publish their Regulation 19 plan, as well as a further six months from the date they publish their Regulation 19 plan to submit their plan to the Planning Inspectorate for examination, to benefit from the transition period.

The standard method has a role not only in plan-making, but is also used in planning decisions to determine whether an area has identified a 5 year land supply for homes and for the purposes of the Housing Delivery Test (where strategic policies are more than five years old). Where this applies, the revised standard method (inclusive of the cities and urban areas uplift) will not apply for a period of six months from the publication of the amended planning practice guidance. After 6 months, the new standard method will apply.

Question responses

Question 1

Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?

Question 1 response

There were 2,121 responses to this question, with 1,952 respondents providing a comment, and 1,546 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

20% of organisations supported this proposal, with 66% disagreeing and the remaining respondents (14%) not sure.

7% of individuals supported this proposal, with 83% disagreeing, and the remaining respondents (10%) not sure.

Overall, this resulted in 14% support for the proposal, 74% against and 12% not sure.

Points raised from those who commented include:

- Local authorities support the principle of bringing stability to the method, agreeing that it could spread housing more fairly across the country. However, they noted that stock is not a determinant of future housing need and acknowledged the volatility and unpredictability of household projections.
- Developers and the construction sector consider that the proposals would introduce a simpler method of quantifying the amount of housing an area needs. These respondents welcome a move away from the over-reliance on household projections, with some supporting a higher baseline figure for housing stock.
- There are merits in introducing an element of standardisation to assess housing need to reduce uncertainty and increase data transparency. The proposals were seen as a positive addition to allow local planning authorities to plan for growth more effectively, but did not go far enough to support the levelling-up agenda.
- Respondents acknowledge the known limitations of household projections from the consultation document but recognise it is a reliable and accessible dataset, and that the housing stock figure merely reinforces existing patterns of growth.

Government response

We are no longer proposing to take forward a stock element in the changes to the standard method and we propose to maintain the 2014-based household projections. The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections. Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 2

In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

Question 2 response

There were 1,502 responses overall to this question with 1,240 respondents providing a comment and 1,293 providing a yes / no / not sure response. The percentages quoted below relate to those who provided a yes / no / not sure response.

18% of organisations supported this proposal, with 65% disagreeing and the remaining respondents (17%) not sure.

9% of individuals supported this proposal, with 71% disagreeing, and the remaining respondents (20%) not sure.

Overall, this resulted in 14% support for the proposal, 68% against and 19% not sure.

Points raised from those who commented include:

- Where the use of stock is supported, across a range of stakeholders there were suggestions that the level of stock should be higher, with suggestions ranging mostly between 0.7 and 1%.
- Linked to this were concerns from across the different groups about the different impacts the proposed level of 0.5% stock would have in different parts of England, including leading to more homes in London and the South East than the North, which does not sufficiently support the government's levelling up agenda.
- Those who are concerned felt that the focus on stock does not directly reflect need or demand. There are also concerns from local authorities, community groups and individuals, about the potential detrimental impact on rural areas or areas with constraints.

Government response

We are no longer proposing to take forward a stock element in the changes to the standard method.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 3

Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

Question 3 response

There were 1,567 responses to this question, with 1,301 respondents providing a comment, and 1,382 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

31% of organisations supported this proposal, with 56% disagreeing and the remaining respondents (13%) not sure.

9% of individuals supported this proposal, with 74% disagreeing, and the remaining respondents (18%) not sure.

Overall, this resulted in 20% support for the proposal, 65% against and 16% not sure.

Points raised from those who commented include:

- For those supporting the measure, respondents suggest the workplace-based median house price to median earnings ratio is the most appropriate and relevant metric to use, although some respondents noted that renters were not taken into account in this ratio.
- Concerns about the effect of commuters on the affordability ratio, such as where high earners impact on local affordability especially in London and the South-East. Some respondents suggest the residence-based ratio could be used to overcome this. Comments also indicated that this could result in a geographical disparity between the north and south.
- That focus on affordability is too narrow, stating that house prices are affected by other factors than only supply (such as interest rates, economic growth) which can impact the affordability of an area.
- That there may be effects of COVID-19 on house prices and earnings, which could affect the affordability ratio going forward. Some respondents suggest using a longer period to overcome year-on-year volatility.

Government response

In relation to the issue of the most appropriate affordability assessment to use, workplace-based or residence-based, we intend to continue using the workplace-based earnings ratio, published annually by the Office for National Statistics. This compares the median salary earned in a local authority against the median house price in that same authority area. This ratio is used as people typically choose to live close to where they work – and therefore is a proxy for demand within the housing market.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 4

Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

Question 4 response

There were 1,430 responses to this question, with 1,113 respondents providing a comment, and 1,251 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

36% of organisations supported for this proposal, with 49% disagreeing and the remaining respondents (14%) not sure.

17% of individuals supported this proposal, 59% disagreeing, and the remaining respondents (24%) not sure.

Overall, this resulted in 27% support for the proposal, 54% against and 19% not sure.

Points raised from those who commented include:

- Those respondents who show support considered the 10-year change proposal to be reasonable, logical or proportionate. Comments were that it worked well alongside the 10-year household projections time period and would make the methodology responsive to longer term trends as well as sudden changes such as a recession.
- For some people the 10-year period was not appropriate and should be either longer (20 years), shorter (5 years, (most commonly suggested by local authorities)), or a rolling average.
- That proposals overcomplicate the calculation by double counting affordability, or conversely oversimplify the approach by not including other important factors – for example developers suggested including job density data as another factor.
- There is comment, including from planning and development consultancies, that this would not support the levelling up agenda between North and South.

Government response

We no longer propose to introduce this element to the standard method.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 5

Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

Question 5 response

There were 1,620 responses to this question, with 1,352 respondents providing a comment, and 1,178 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

22% of organisations supported this proposal, with 60% disagreeing and the remaining respondents (18%) not sure.

10% of individuals supported this proposal, with 66% disagreeing and the remaining respondents (24%) not sure.

Overall, this resulted in 16% support for the proposal, 63% against and 21% not sure.

Points raised from those who commented include:

- Affordability is given too great a weight in the proposals resulting in excessive uplift over the baseline, relative to other factors such as constraints, according to the majority of those opposed. Conversely, a very small number thought the weighting should be higher, with developers keen to ensure that constraints do not cause final figures to drop.
- Certain groups are more favourable to the proposals, particularly the development industry.
- Concern that the approach would skew housing need too strongly towards expensive regions such as London and the South East, and would therefore be detrimental in levelling-up the North. A related, less commonly expressed, concern is that development would be channelled towards expensive but sensitive rural areas and protected landscapes.
- More generally, a common view is that the additional dwellings delivered due to the affordability uplift would not actually have the desired effect of reducing house prices.

Government response

In recognition of concerns that affordability was over-emphasised in our proposals, the new approach will not put any additional weighting on affordability within the formula. The existing weighting will be maintained.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 6

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination? If not, please explain why. Are there particular circumstances which need to be catered for?

Question 6 response

There were 1,309 responses to this question, with 994 respondents providing a comment, and 1,078 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

35% of organisations showed support for this proposal, with 41% disagreeing and the remaining respondents (23%) not sure.

19% of individuals supported this proposal, with 55% disagreeing and the remaining respondents (26%) not sure.

Overall, this resulted in 27% support for the proposal, 48% against and 25% not sure.

Points raised from those who commented include:

- A six-month transition period is felt to be too short by many respondents and should be extended. Suggestions included nine to twelve months, particularly in light of current resourcing pressures faced by local authorities in meeting these timescales. They also consider that it would provide an opportunity to reflect on the COVID-19 crisis with the potentially substantial

implications on the housing market, and the effects of a change to home working, as well as future use of office property, commuting patterns, demand for larger homes and access to green spaces.

- Developers consider that six months is appropriate in recognising the need for a transition period, although some felt it may be too long to ensure that housing numbers are brought up to date quickly. Comment also included that the transition period may create a period of uncertainty while areas process what the changes mean for them, potentially delaying delivery, while other plans might be rushed through ill-advisedly.
- There are concerns about the consequential impact of the new LHN in relation to calculations of the 5-year land supply, and the presumption in favour of sustainable development, and comment that further transitional arrangements should be applied here.

Government response

We anticipate that transitional arrangements will only apply to a small number of authorities. We intend to implement a transition period as proposed in the consultation (i.e. authorities already at Regulation 19 will be given six months from the publication date of the revised guidance to submit their plans to the Planning Inspectorate under the existing standard method). However, this transition period is only for those areas delivering the additional cities and urban centres uplift and will not apply to other areas. We recognise concerns expressed by some in the consultation that the six months transition period may be too short, but we feel that six months is appropriate to ensure that the country begins planning for the numbers of homes we need without significant delay.

In recognition that the standard method has a role not only in plan-making, but also is used in planning decisions to determine whether an area has identified a 5-year land supply for homes and for the purposes of the Housing Delivery Test (where strategic policies are more than five years old), we want to be clear how the new standard method applies in these circumstances. For those areas with the additional cities and urban uplift, transitional arrangements will apply in decision-making in applying the standard method, to ensure that the 20 cities and urban centres are not immediately affected by increased land supply expectations. These transitional arrangements will apply for six months from the date of publication of the guidance. After six months, the standard method will apply.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 7

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate? If not, please explain why. Are there particular circumstances which need to be catered for?

Question 7 response

There were 1,317 responses to this question, with 987 respondents providing a comment, and 1,084 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

33% of organisations supported this proposal, with 44% disagreeing and the remaining respondents (23%) not sure.

19% of individuals supported this proposal, with 54% disagreeing and the remaining respondents (27%) not sure.

Overall, this resulted in 26% support for the proposal, 49% against and 25% not sure.

Points raised from those who commented include:

- The significant constraints imposed by typical resourcing levels at local authorities, allowing for existing plan-making work, the practical circumstances of the COVID-19 pandemic, and the realistic ability of local authorities being able to progress a local plan to second stage consultation in the timescale proposed.
- Suggestions for a longer transition period, particularly from local authorities, to publish a second stage consultation. An extension from three to six months is generally the most common suggested, although other suggestions were that areas that have published a first stage consultation should benefit from transitional arrangements.
- Other alternatives include a shorter or narrower transition period (particularly suggested by developers), no transition measures at all, or considering wider modifications to the application of LHN in the planning process.

Government response

See section on transitional arrangements for specific details of how the transitional arrangements will apply. We recognise concerns expressed by some in the consultation that transition periods may be too short, but we consider that the detailed proposals set out are appropriate to ensure that the country begins planning for the numbers of homes we need without significant delay.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 35

In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty? If so, please specify the proposal and explain the impact. If there is an impact – are there any actions which the department could take to mitigate that impact?

Question 35 response

This question did not ask for yes / no / not sure options. There were 845 comment responses to this question.

It should be noted that this question related to all the policy areas consulted on in the 'Changes to the current planning system' consultation - changes to the standard method; securing First Homes through developer contributions; temporarily lifting the small sites threshold; and extending the current Permission in Principle to major development.

The analysis below relates only to the equality aspects related to the standard method. Those issues related to the remaining policy areas will be considered separately.

Points raised from those who commented include:

- With regard to transitional proposals, the importance of ensuring everyone has sufficient opportunity to engage in any local plan consultation processes, particularly where internet access or access to technology is an issue for some demographics and some areas of the country.
- Concern that Gypsies and Travellers are not sufficiently accounted for in the proposed overall housing numbers.
- That unrealistic housing targets might be created by not accounting for communal establishments.
- That proposals penalise those with equity saved in their homes, likely older people; prioritises homeownership which will benefit particular groups over others; and do not support the levelling-up agenda by not supporting economically deprived areas which have, for example, a greater proportion of BAME individuals.
- Perceived reduction in Local Authority influence on housing need and allocation under the proposals.

Government response

The equality impact question was focused on the impacts of the consultation proposals which were not taken forward. However, the final policy proposals were considered in light of a detailed assessment of the equality impacts as required by the Public Sector Equality Duty (PSED).

As part of the PSED we sourced the relevant population and equality data using mid-year estimates and Annual Population Survey data to understand the impact a cities and urban centres uplift would have on our existing policy, comparing data between the 20 cities and urban centres and the England average. We concluded that uplifting the housing numbers in these cities and urban centres would appear to support younger people proportionately more, as well as men and those not reporting as white UK national. This will help support those from different ethnic minorities and younger people to access a greater number of homes. In particular this will support younger people into home ownership. While this may also mean that older people, women and those reporting as white UK national are less likely to live in cities and urban centres, we feel that this is mitigated by the fact that those areas which will not have a cities and urban centres uplift will continue with the same standard method as previously, so they do not experience a decrease in the number of homes being planned for. Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

[2] For Spatial Development Strategies this would refer to consultation under s335(2) of the Greater London Authority Act 1999

[3] For spatial development strategies, 'submission' in this context means the point at which the Mayor sends to the Panel copies of all representations made in accordance with regulation 8(1) of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, or equivalent.

[4] As contained housing and economic needs assessment planning practice guidance, published February 2019

[5] For Spatial Development Strategies this would refer to consultation under s335(2) of the Greater London Authority Act 1999

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