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LOCAL
ENTERPRISE
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28 April 2017

Dear Secretary of State

Re: Solent Local Enterprise Partnership (LEP) Response to 'Fixing Our Broken Housing Market' White paper consultation

Further to the publication of the Housing White paper Solent LEP welcome the opportunity to comment on it and we support the assertion that there is a real and pressing need for radical, lasting reform that will get more homes built right now and for many years to come.

Solent LEP has been working together with local, regional and national partners since 2010, unconstrained by boundaries to support the growth of our economy which has seen an uplift in GVA of £3.5 billion since we produced our Strategic Economic Plan.

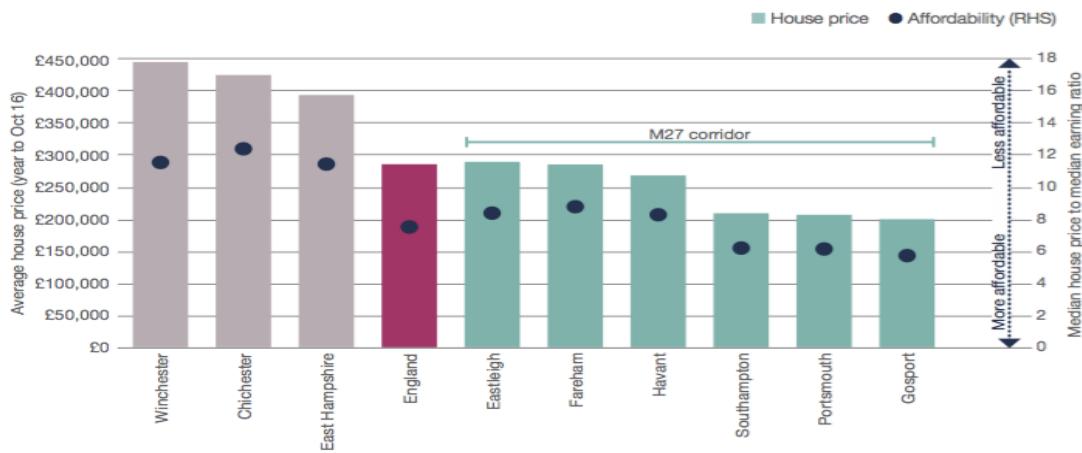
The total value of GVA in Solent stood at £27.8 billion in 2016, accounting for just under 12% of regional output. Economic growth was lower than anticipated in 2015 at 1.6% which was lower than the outturn for the South East (1.8%) and the UK (2.2%). In the longer term to 2036 GVA in the Solent LEP area is expected to grow by 2% per annum increasing to £44bn by 2036. which in itself will lead to more jobs and higher standards of living across the Solent area.

However, we have identified that a lack of housing in the area is constraining our growth and is holding back productivity. There is a need to bring forward new housing and as such we have prioritised infrastructure funding in our Strategic Economic Plan and Local Growth deal to support key housing schemes as North Whiteley and

Welborne. In both instances these developments have encountered delay and have not yet come forward.

Alongside this we have recognised that housing also has a vital role to play. In the Solent area the market is challenging when viewed from the perspective of new supply, availability and affordability. The following diagram shows affordability ratios in our area.

Average house prices, affordability and supply in the M27 corridor



Source: HM Land Registry, DCLG, local authority SHMAs, DCLG

There is a serious and chronic shortage of housing and steps are being taken to address this with delivery of new housing featuring very prominently in the Solent SEP. Notwithstanding this we need to do more as it is affecting productivity and restricting labour market flexibility, with many businesses simply unable to fill vacancies and many areas of the health and social sector reporting skills shortages as they struggle to recruit key workers. Left unresolved this will continue to be a drag on our productivity.

A recent report published by Savills shows that economic growth in the Solent area will place further pressure on an already undersupplied housing market. According to the current Strategic Housing Market Assessments (SHMAs) for the local authorities along the M27 corridor, at least 4,000 additional homes are required per year.

Whilst the supply of new homes increased over the last five years, reaching 3,060 in the year to March 2016, it was still short of need by 940 homes per annum. The low level of supply has contributed to an increase in house prices. Over the year to September 2016, house prices have grown between 8.0% and 10.7% across all six core authorities that are fully contained within the Solent LEP area which is above the national average of 7.1%. It is against this backdrop that we are providing our response in this covering letter and this is supplemented by specific responses to the consultation questions as set out in Annex A.

In general terms the White Paper repeats an intention to intervene to ensure delivery of up-to-date local plans. Two initiatives are proposed: a standard methodology for assessing housing need; and a housing delivery test creating targets for local planning authorities without a valid local plan, to be phased in from November 2017-20. The proposed sanction for inadequate compliance is imposition of the 'presumption in favour of development'. Business remain supportive of pro- growth policies in this regard and also of a move to spatial development strategies on a wider basis as cooperation across boundaries and strategic planning across economic areas such as the Solent needs to be strengthened to deliver further efficiency, simplification and streamlining into the system as well as greater coherency. A more holistic and collaborative approach is required to deliver housing than just a statutory duty to cooperate and it is critical that this integrated approach links up housing need with local and regional infrastructure needs and services. This will need to sit alongside the proposal to introduce a standard methodology for assessing housing need and the housing delivery test.

Solent LEP also believes that there is a serious and chronic shortage of housing in our area and an affordability issue. We recognise the vital role that housing has to play in underpinning our strategic economic objectives

and we have identified the need to bring forward new housing as a key policy and we are actively supporting major housing initiatives. Increases in housing costs and availability of the right sort of homes in the right places are potentially affecting productivity and restricting labour market flexibility with businesses and public sector employers increasingly reporting skills shortages.

Solent LEP therefore welcomes the proposal to make more efficient use of land by building at higher densities. We are highly supportive of improving digital infrastructure although our view is that there needs to be equal discipline on the providers as well as the planners to secure delivery. We agree that local planning authorities should deliver up-to-date local plans but we are disappointed that the White Paper offers very little change in the plan-making process that would help streamline a complicated system. Further simplification of the plan-making system is needed, particularly to support large sites, where strategic infrastructure is needed to enable the development to come forward. There is a need to streamline the system of approvals and the layers of decision making if we are to move to a system that delivers proportionate and timely decisions.

Solent LEP also notes the very big gap between planning permissions granted for housing and new houses built. We agree that the house building industry is too concentrated and that there needs to be further incentives to develop land for housing quickly once land has been acquired. However, our experience is that major developments are also held up by a number of factors, of which the most significant is failure of the public utilities (and in some cases, public authorities) to plan for additional infrastructure and services - such as power, water and drainage - and to coordinate delivery with the timescale of development. Secondly, the process of agreeing an implementable planning consent for all schemes is very protracted and this is an issue across the whole housing market that needs resolving as a matter of urgency. In neither case do we feel that the White Paper has offered any significant proposals that will make a difference.

Solent LEP also believes that there are other lost opportunities in this White Paper. We note that the private rented sector is the fastest growing form of tenure, it is expensive and as the White Paper notes, 28% of PRS homes are non-decent. We would encourage the Government to address the cost, tenure terms and condition of PRS housing. Given that the Solent area is focused around the two cities of Southampton and Portsmouth, we should also wish to see greater clarity about local authorities' role in delivering additional housing. To a certain extent the White Paper needs to be more explicit about the major contribution that local authorities have made to increasing the housing supply post-war: it offers the Accelerated Housing programme as a way of delivering on publicly owned land and hints at a willingness to work with selected local authorities on a bespoke basis. Solent LEP are already working proactively with local authorities in our area to look at new and innovative ways of increasing housing supply through the Solent accelerated housing delivery scheme where Solent LEP are partnering with local authorities and the private sector in the area to bring forward a new and innovative housing delivery programme exploiting new offsite modular build techniques. Primarily it focuses on local authorities making public land available and ready to build on alongside working with innovative private sector companies to build out on such sites.

Critically there is a need to recognise and take further action to address the skills shortages in the industry. Following the Farmer Review of construction, the industry committed to bringing 45,000 additional workers into the industry by 2019/20. *"Some progress has been made"* but a new look at skills training and modern construction methods (MMC) is proposed. Addressing the broader skills gap in construction, particularly in civil engineering and ground works is also needed to support the stated ambition to adopt a new approach to housebuilding.

Finally, Solent LEP notes the plethora of Government funding schemes to encourage housing provision, aimed at purchasers, house builders, the institutions and public bodies. We think there is a need for greater clarity, focus and funding simplification. There is a need for a single housing pot to enable LEP areas to address the gap between housing supply and household growth which is huge and growing. In many cases this demands significant public subsidy and introducing further flexibilities about how the money is used (in transport, skills and or land remediation, rather than just housing supply) could better unlock housing development. And given the seriousness of the housing crisis this is not insignificant. Programmes could be also shaped for local housing markets, and designed with these in mind including different needs and demands by place. For example; reviewing the freedoms to borrow could support additional housing, but local authorities will need to be confident

they can secure profitable housing sales and maintain rental streams. Big challenges also exist for us in the Solent on brownfield sites where land values are negative and in areas where values are so low as to make new build unprofitable.

We believe that, given the LEPs' role in strengthening their local economies, their awareness of local housing needs and local markets, consideration should be given to using LEPs to identify and help secure delivery of additional housing. Solent LEP have and can continue to play a role in bringing house builders, developers, housing associations and other partners together to deliver on a pan-local authority basis and using our Local growth funding we have been looking to unlock development by assembling land and providing infrastructure as well as working with some of our local authority partners to develop revolving infrastructure funds. Money has been recouped through land receipts, retained rates on our Enterprise Zone and S106 contributions and there is an appetite to build on this work.

Solent LEP also has an accelerated development programme of strategic sites and we have also aligned land and funding initiatives, including Local Growth Funding, the Growing Places Fund and Regional Growth Funding to support commercial and residential property. There have also been other one-off national initiatives open to individual councils and combined authorities, such as the One Public Estate programme something which we have been engaged with. It is clear that the role of LEPs is becoming even more important and we can do more and we would ask the government to consider increasing the role that LEPs can and do play in delivering on housing and infrastructure given our ability to act at a strategic level across a functional housing and economic market.

If you have any further queries or would like to discuss any aspect of this response in more detail please contact our Chief Executive at: anne-marie.mountifield@solentlep.org.uk

Yours sincerely,



Gary Jeffries
Chairman
Solent Local Enterprise Partnership

TOGETHER.STRONGER

<p>1. Do you agree with the proposals to:</p> <p>a) Make clear in the National Planning Policy Framework that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the Framework, with an additional requirement to plan for the allocations needed to deliver the area's housing requirement?</p> <p>b) Use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?</p> <p>c) Revise the National Planning Policy Framework to tighten the definition of what evidence is required to support a 'sound' plan?</p>	<p>a) Solent LEP agrees that Local Plans should seek to make allocations to meet an area's housing requirements. In the Solent area there is a serious and chronic shortage of housing and steps are being taken to address this with delivery of new housing featuring very prominently in the Solent Strategic Economic Plan. Housing availability is affecting productivity and restricting labour market flexibility, with many businesses and public services reporting skills shortages and unable to fill vacancies.</p> <p>b) In the Solent cooperation between planning authorities already takes place, although not under a Combined Authority arrangement. We agree that provision should be made to use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority. Solent LEP therefore welcomes the willingness to take a broader strategic view of planning for areas greater than individual authorities and to consider how the duty to cooperate has worked in practice. A more holistic and collaborative approach is required to deliver housing than just a statutory duty to cooperate. Allowing neighbouring local authorities to act together to produce a single Local Plan for their combined area will therefore be important in all areas not just areas with a Combined Authority.</p> <p>c) Housing supply will only meet need if up-to-date local plans add up to assessed need across an LEP area. Therefore, evidence required to support a sound plan should include requiring authorities to demonstrate a clear strategy to meet local needs in the LEP area as well as any needs that genuinely cannot be met within neighbouring authorities.</p>
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<p>2 What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together</p>	<p>Solent LEP proposes that a LEP's Strategic Economic Plan and/or Economic Strategy should be a recognised part of the evidence base in compiling Local Plans.</p> <p>Similarly there will need to be a requirement to align with the wider Industrial Strategy once published.</p>
<p>3 Do you agree with the proposals to:</p> <p>a) amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?</p> <p>b) from early 2018, use a standardised approach to assessing housing requirements as the baseline for five-year housing supply calculations and monitoring housing delivery, in the absence of an up-to-date plan?</p>	<p>a) no comment</p> <p>b) It will be important that the standardised method is a starting point, allowing authorities to plan for higher job growth and the homes that those workers will need. Solent LEP is however cautious about a <i>standardised</i> methodology and a one-size-fits-all approach. We would also support assessments being undertaken over a strategic area, to ensure that assessing housing requirements in local areas of high density housing or where market demand pressures significantly outstrip supply can be broadened to ensure that there is a clear strategy to meet local needs in the LEP area as well as any needs that genuinely cannot be met within neighbouring authorities so that there is a baseline for five year housing supply by LEP area to underpin the economic strategy for the area.</p>
<p>4 Do you agree with the proposals to amend the presumption in favour of sustainable development so that:</p> <p>a) authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?</p> <p>b) it makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?;</p>	<p>a) Solent LEP's area is the most urbanised part of the South East outside of London and Solent LEP strongly supports the need to plan to maximise the use of the available development land.</p> <p>b) Solent LEP supports the need to plan to meet the housing requirement but recognises that the availability of development land may be highly constrained by, for example, environmental</p>

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<p>c) the list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the National Planning Policy Framework (so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?</p> <p>d) its considerations are re-ordered and numbered, the opening text is simplified and specific references to local plans are removed?</p>	<p>considerations (e.g. Land held by central government, National Parks, Marine Coastal Zones and flood risk) and by the capacity of strategic and local infrastructure.</p> <p>c) no comment</p> <p>d) no comment</p>
<p>5 Do you agree that regulations should be amended so that all local planning authorities are able to dispose of land with the benefit of planning consent which they have granted to themselves?</p>	<p>Agree as a means of accelerating development and enabling the public sector to benefit from uplift in land values</p>
<p>6 How could land pooling make a more effective contribution to assembling land, and what additional powers or capacity would allow local authorities to play a more active role in land assembly (such as where 'ransom strips' delay or prevent development)?</p>	<p>Solent LEP supports further land assembly by public authorities to unlock development land. One constraint on local authorities is the financial outlay and risk, which might be mitigated by HCA involvement.</p>
<p>7 Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard?</p>	<p>In urbanised areas such as the Solent area, estate regeneration plays an essential role in providing additional housing. Solent LEP therefore supports further such initiatives but is aware that such schemes are expensive and resource-intensive, and local authorities need access both to the funding and, critically, to the delivery expertise to implement these policies.</p>
<p>8 Do you agree with the proposals to amend the National Planning Policy Framework to:</p> <p>a) highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing?;</p> <p>b) encourage local planning authorities to</p>	<p>a) no comment</p>

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<p>identify opportunities for villages to thrive, especially where this would support services and help meet the authority’s housing needs?;</p> <p>c) give stronger support for ‘rural exception’ sites – to make clear that these should be considered positively where they can contribute to meeting identified local housing needs, even if this relies on an element of general market housing to ensure that homes are genuinely affordable for local people?;</p> <p>d) make clear that on top of the allowance made for windfall sites, at least 10% of sites allocated for residential development in local plans should be sites of half a hectare or less?;</p> <p>e) expect local planning authorities to work with developers to encourage the sub-division of large sites?; and</p> <p>f) encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly?</p>	<p>b) Solent LEP endorses encouragement to local authorities to provide for sustainable development in all locations</p> <p>c) no comment</p> <p>d) no comment</p> <p>e) Solent LEP does endorse this proposal if it encourages a greater diversity of builders. Smaller developers will be given a boost by moves to encourage planning authorities to allocate a greater number of smaller sites (10% to be half a hectare or less) and bigger developers to sub-divide large sites. Therefore, we endorse the aim of encouraging SME developers and new entrants to the market.</p> <p>f) Solent LEP supports the use of LDOs and Design Codes where they improve the quality of development and the pace of delivery</p>
<p>9 How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?</p>	<p>Solent LEP emphasises the importance of linking investment decisions in infrastructure (whether local or strategic) with development. Our experience is that major developments are delayed by the failure of both the public sector and the private utility services (e.g. power and water supply, drainage) to both plan for, and deliver the necessary infrastructure in a timescale that meets development needs, with the consequence that housing development is stalled or delayed. Solent LEP regards this as a critical cause of delays to major housing projects in the Solent area. We note statements in the White Paper about Government's determination to address these issues but Solent LEP would like to see concrete proposals brought forward.</p>

	<p>There is also a need to look at a new approach to developers' contribution to infrastructure, particularly where strategic infrastructure improvements do make additional land available for housing. In terms of developer contributions, this includes both reform of Community Infrastructure Levy (CIL) and an attempt to standardise an 'open book' approach to Section 106 agreements.</p> <p>Also with large development sites there will often be a requirement for a range of infrastructure to be funded and delivered to mitigate the impact of the development. For significant developments and to support viability considerations there is often a role for public funding to sit alongside private sector investment. As the infrastructure requirements can cover a range of government departmental and local authority budget areas (e.g. transport, energy, education, etc.), there is a strong case for such developments to be considered by a single body, that engages and agrees any public funding across the totality of the development, rather than each infrastructure element being looked at separately. It is our view that such an approach would support the acceleration of development and new innovation in development as well as new market entrants through a reduction in the broad spectrum of interactions and works that the private sector are expected to conduct and fund and allow a more pragmatic and strategic view across the development.</p>
<p>10 Do you agree with the proposals to amend the National Planning Policy Framework to make clear that:</p> <p>a) authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting them identified development requirements?</p> <p>b) where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality</p>	<p>a) Solent LEP agrees that Green Belt land should be de-designated only where all reasonable alternatives have been explored</p> <p>b) No comment</p>

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<p>or accessibility of remaining Green Belt land?</p> <p>c) appropriate facilities for existing cemeteries should not to be regarded as 'inappropriate development' in the Green Belt?</p> <p>d) development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt?</p> <p>e) where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan (or plans) for the area in question?</p> <p>f) when carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs?</p>	<p>c) No comment</p> <p>d) No comment</p> <p>e) No comment</p> <p>f) Agree. We strongly support planning for development around transport hubs</p>
<p>11 Are there particular options for accommodating development that national policy should expect authorities to have explored fully before Green Belt boundaries are amended, in addition to the ones set out above?</p>	<p>Solent LEP supports making the best use of development land and higher density development around all public transport hubs irrespective of green belt status.</p>
<p>12 Do you agree with the proposals to amend the National Planning Policy Framework to:</p> <p>a) indicate that local planning authorities should provide neighbourhood planning groups with a housing requirement figure, where this is sought?;</p> <p>b) make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents</p>	<p>a) Solent LEP queries whether it is practical to estimate housing need within localised areas which form part of a larger housing market and to seek provision of that requirement in a very local area. See response to 1 b) and 1 c)</p> <p>b) We support improved design and design codes relating to layout and homes.</p>

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<p>(such as action area plans) are expected to set out clear design expectations; and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals?;</p> <p>c) emphasise the importance of early preapplication discussions between applicants, authorities and the local community about design and the types of homes to be provided?;</p> <p>d) makes clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in statutory plans?; and</p> <p>e) recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be reflected in plans and given weight in the planning process?</p>	<p>c) no comment</p> <p>d) no comment</p> <p>e) no comment</p>
<p>13 Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:</p> <p>a) make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?;</p> <p>b) address the particular scope for higher density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?;</p>	<p>a) We strongly support better use of land and strengthening planning guidance to secure well-planned higher density development.</p> <p>b) Solent LEP notes that increased urban densities - especially in city locations such as Southampton and Portsmouth in our area - may only be achievable with reinforcement and/or replacement of infrastructure and that it is not feasible to seek to deliver higher density or Estate Regeneration schemes without capital investment in the supporting infrastructure. Further evidence on the need for this in the Solent is documented in our Transport Investment Plan – (See: https://solentlep.org.uk/media/1514/tip-final-web-version.pdf) In the</p>

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<p>c) ensure that in doing so the density and form of development reflects the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?;</p> <p>d) take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?</p>	<p>Solent area for example, we have commissioned a major study of potential investment in a rapid transit system that will support high density urban development in the City of Southampton and provide improved access to Southampton Airport. Also within our Productivity and Growth Strategy we have prioritised a new city centre road in Portsmouth to support the development of new growth opportunities including housing. (See: https://solentlep.org.uk/media/1860/productivity-and-growth-strategy-update-february-2017.pdf)</p> <p>c) no comment</p> <p>d) no comment</p>
<p>14 In what types of location would indicative minimum density standards be helpful, and what should those standards be?</p>	<p>As stated at Q13 above, effective public transport systems cannot be sustained with low density development so enhanced densities are important not only for urban areas but growth nodes and new settlements. Solent LEP believes that a range of densities needs to be set for city, urban and village locations and that these need to make substantially more intensive use of land than has traditionally been the case</p>
<p>15 What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning (using tools such as policy, local development orders, and permitted development rights)?</p>	<p>Solent LEP strongly supports the release and more intensive exploitation of public sector land. Public land holdings in our area are dominated by Ministry of Defence/DIO land and we should like to see a more aggressive public land release policy for both housing and commercial development with a presumption in favour of release unless proven otherwise.</p> <p>We also propose closer working between land-holding and planning authorities to prepare land for release and to secure returns from land value uplift to the public sector.</p> <p>We support intensified development of land and buildings by public and health authorities for housing of key workers as a way of reducing</p>

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	recruitment and retention difficulties that are being experienced in the Solent area.
<p>16 Do you agree that:</p> <p>a) where local planning authorities wish to agree their housing land supply for a one year period, national policy should require those authorities to maintain a 10% buffer on their 5 year housing land supply?;</p> <p>b) the Planning Inspectorate should consider and agree an authority's assessment of its housing supply for the purpose of this policy?</p> <p>c) if so, should the Inspectorate's consideration focus on whether the approach pursued by the authority in establishing the land supply position is robust, or should the Inspectorate make an assessment of the supply figure?</p>	<p>a) to c) Clarification on how this mechanism will operate would be needed and consulted on before this is brought into operation. However, maintaining the 10% buffer reflects the requirements in the NPPF and is therefore supported. In addition we would expect that if the assessment has been undertaken in consultation with the development industry and infrastructure providers then this would represent a robust position.</p>
<p>17 In taking forward the protection for neighbourhood plans as set out in the Written Ministerial Statement of 12 December 2016 into the revised NPPF, do you agree that it should include the following amendments:</p> <p>a) a requirement for the neighbourhood plan to meet its share of local housing need?;</p> <p>b) that it is subject to the local planning authority being able to demonstrate through the housing delivery test that, from 2020, delivery has been over 65% (25% in 2018; 45% in 2019) for the wider authority area?</p> <p>c) should it remain a requirement to have site allocations in the plan or should the protection apply as long as housing supply policies will meet their share of local housing need?</p>	<p>a) Solent LEP supports the engagement of the community in shaping the local delivery of housing but responsibility for overall housing delivery must rest with the local planning authority (or groups of authorities) rather than individual neighbourhoods.</p> <p>b) no comment</p> <p>c) no comment</p>
<p>18 What are your views on the merits of introducing a fee for making a planning appeal? We would</p>	

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<p>welcome views on:</p> <p>a) how the fee could be designed in such a way that it did not discourage developers, particularly smaller and medium sized firms, from bringing forward legitimate appeals;</p> <p>b) the level of the fee and whether it could be refunded in certain circumstances, such as when an appeal is successful; and</p> <p>c) whether there could be lower fees for less complex cases.</p>	<p>a) Solent LEP does not support the proposal for a fee capped at £2,000 and advise that Government should look more fundamentally at defining the grounds for appeal.</p> <p>b) no comment</p> <p>c) no comment</p>
<p>19 Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?</p>	<p>Solent LEP strongly supports the need to plan for the provision of high quality digital infrastructure. Our view is shaped by poor existing mobile phone services and poor broadband in our area which is a potentially serious constraint on our local economy. Our view is that no new housing or commercial development of any scale should be approved without full provision being made to digitally-enable the development.</p> <p>Solent LEP further believes however that an equivalent discipline should be placed on the providers of digital infrastructure to plan and deliver the required service improvements and that there should be penalties on providers that fail to meet their obligations to support planned new developments.</p>
<p>20 Do you agree with the proposals to amend national policy so that:</p> <ul style="list-style-type: none"> • the status of endorsed recommendations of the National Infrastructure Commission is made clear?; and • authorities are expected to identify the additional development opportunities which strategic infrastructure improvements offer for making additional land available for housing? 	<p>Agree.</p>
<p>21 Do you agree that:</p> <p>a) the planning application form should be amended to include a request for the</p>	<p>a) Solent LEP agrees with the principle set out in the White Paper to make house-builders more accountable for delivery and to require</p>

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<p>estimated start date and build out rate for proposals for housing?</p> <p>b) that developers should be required to provide local authorities with basic information (in terms of actual and projected build out) on progress in delivering the permitted number of homes, after planning permission has been granted?</p> <p>c) the basic information (above) should be published as part of Authority Monitoring Reports?</p> <p>d) that large housebuilders should be required to provide aggregate information on build out rates?</p>	<p>publication of monitoring data. It will also help to address the popular misconception that housebuilders land-bank to take advantage of increasing values. In our experience, this does not happen to anything like the extent reported as major housebuilders are driven by demanding ROCE targets</p> <p>b) agree</p> <p>c) see d</p> <p>d) Agree and propose that such information should be published in the Annual Reports of house builders</p>
<p>22 Do you agree that the realistic prospect that housing will be built on a site should be taken into account in the determination of planning applications for housing on sites where there is evidence of non-implementation of earlier permissions for housing development?</p>	<p>no comment</p>
<p>23 We would welcome views on whether an applicant's track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development.</p>	<p>Solent LEP agrees with the <i>objective</i> of taking into account a house-builder's record of development in determining planning applications.</p> <p>This would address the popular misconception that housebuilders land-bank to take advantage of increasing values. In our experience, this does not happen to anything like the extent reported. For example at least one major house builder has reported that they do not have a single site on which they have a fully implementable planning permission that is not being built out. The major housebuilders are driven by demanding ROCE targets and having land doing nothing on their books is not at all desirable.</p>

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<p>24 If this proposal were taken forward, do you agree that the track record of an applicant should only be taken into account when considering proposals for large scale sites, so as not to deter new entrants to the market?</p>	<p>Disagree. Solent LEP sees no reason why this provision should apply only to larger sites and we are aware of medium sized sites owned by small developers in the Solent where housing development has been delayed - in one case, over 20 years - and the local authority has insufficient powers to secure delivery</p>
<p>25 What are your views on whether local authorities should be encouraged to shorten the timescales for developers to implement a permission for housing development from three years to two years, except where a shorter timescale could hinder the viability or deliverability of a scheme? We would particularly welcome views on what such a change would mean for SME developers.</p>	<p>Solent LEP agrees the <i>objective</i> of this and other proposals set out in the White Paper that the grant of planning permission carries with it the 'expectation of development'. Large housing developments have a significant lead time and starts on site are frequently delayed by the need to conclude developer contributions, agreement of reserved matters, delivery of supporting infrastructure etc. Therefore we do agree that there should be exceptions where a shorter timescale could hinder the viability or deliverability of a scheme</p>
<p>26 Do you agree with the proposals to amend legislation to simplify and speed up the process of serving a completion notice by removing the requirement for the Secretary of State to confirm a completion notice before it can take effect?</p>	<p>Solent LEP agrees that local planning authorities should have effective powers to require completion of development and we have been advised that the present procedure is ineffective. Simplifying the procedure is in itself insufficient to deliver the required outcome and that a more fundamental look at the powers of local authorities to ensure delivery of consented development is required.</p>
<p>27 What are your views on whether we should allow local authorities to serve a completion notice on a site before the commencement deadline has elapsed, but only where works have begun? What impact do you think this will have on lenders' willingness to lend to developers?</p>	<p>No comment</p>
<p>28 Do you agree that for the purposes of introducing a housing delivery test, national guidance should make clear that: a) The baseline for assessing housing delivery should be a local planning authority's annual housing requirement where this is set out in an up-to-date plan? b) The baseline where no local plan is in place should be the published household</p>	<p>a) agree b) no comment c) no comment d) agree</p>

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<p>projections until 2018/19, with the new standard methodology for assessing housing requirements providing the baseline thereafter? c) Net annual housing additions should be used to measure housing delivery? d) Delivery will be assessed over a rolling three-year period, starting with 2014/15 – 2016/17?</p>	
<p>29 Do you agree that the consequences for under-delivery should be: a) From November 2017, an expectation that local planning authorities prepare an action plan where delivery falls below 95% of the authority's annual housing requirement?; b) From November 2017, a 20% buffer on top of the requirement to maintain a five year housing land supply where delivery falls below 85%?; c) From November 2018, application of the presumption in favour of sustainable development where delivery falls below 25%?; d) From November 2019, application of the presumption in favour of sustainable development where delivery falls below 45%?; and e) From November 2020, application of the presumption in favour of sustainable development where delivery falls below 65%?</p>	<p>Solent LEP agrees the principle of monitoring housing delivery as set out in up-to- date local plans. It needs to be recognised however that in areas such as the Solent, the housing market crosses local authority boundaries and strategic cooperation between planning authorities is required to make appropriate housing provision.</p> <p>We believe that, given the LEPs' role in strengthening their local economies, their awareness of local housing needs and local markets, consideration should be given to using LEPs to identify and help secure delivery of additional housing, given our ability to act at a strategic level across a functional housing and economic market.</p> <p>Moreover, our experience is that major housing developments may be held up by infrastructure or other delays - sometimes by other parts of the public sector/statutory authorities/utilities - for which the planning authority cannot be held responsible. Local authorities therefore need to be given the opportunity to explain shortfalls against their housing delivery plans in <i>every year</i> before any sanction is applied. We therefore advocate that local planning authorities should have contingency plans for bringing forward substitute schemes that can maintain the pace of housing delivery but equally they should be given greater opportunity to set out proposed actions and that this can be considered when the consequences for under delivery are being looked at.</p>
<p>30 What support would be most helpful to local planning authorities in increasing housing</p>	<p>Solent LEP notes that the planning system is essentially a <i>permissive</i> system that enables development to happen rather than <i>requiring</i></p>

<p>delivery in their areas?</p>	<p>development to be undertaken and Solent LEP therefore questions whether the current system is equipped to secure the desired outcomes. Our concern is that many planning authorities lack the expertise, the resources and the toolkit to ensure that homes are built on time and in the right place.</p> <p>Solent LEP welcomes the White Paper's proposals in relation to a discipline on housebuilders to deliver but we would wish to see:</p> <ul style="list-style-type: none"> • greater clarity about the role of the planning system in securing delivery; and • clearer powers for local authorities for securing compliance. • better training for planners about how to secure delivery; • streamlined planning processes aimed at achieving the intended outcome of enabling the development of more housing; • greater discipline on the utility companies to work with local planners to plan for increased capacity to develop housing; • greater public support for major projects, including capacity funding for local planning authorities seeking to develop major or innovative projects; • potential use of offsite construction principally to increase the quality of housing and to address the lack of skills in the housebuilding industry. <p>Solent LEP also supports enabling local authorities to invest more in housing. The history of housebuilding over the last half century is that publicly supported housing providers - local authorities and housing associations - have been much more effective in accelerating delivery than the private sector. We therefore support the ambitions of local authorities in the Solent area, including Southampton and Portsmouth City Councils, to increase housing provision by direct investment.</p>
<p>31 Do you agree with our proposals to: a) amend national policy to revise the definition of affordable housing as set out in Box 4?;</p>	<p>a) no comment b) no comment</p>

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<p>b) introduce an income cap for starter homes?; c) incorporate a definition of affordable private rent housing?; d) allow for a transitional period that aligns with other proposals in the White Paper?</p>	<p>c) given the rising significance of the private rented sector in the housing market we agree that a definition of affordable private rented housing should be included d) no comment</p>
<p>32 Do you agree that: a) national planning policy should expect local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products? b) that this policy should only apply to developments of over 10 units or 0.5ha?</p>	<p>a) Solent LEP notes that the proposed 10% affordable homes on a site is a reduction on current practice where traditionally local planning authorities have required around 30% affordable homes for rent. Our view is that a 10% requirement relating to all forms of affordable tenure should be seen as a minimum as in some cases it may not be sufficient to meet the affordability needs of our local residents. Given the range of housing needs in our area, we propose that local planning authorities should be able to propose a different affordability percentage based on a <i>clearly evidenced</i> appraisal of housing need. The affordable component of housing on each development should be subject to a viability test. b) Some small schemes will be in rural (and potentially high value) locations where there is a requirement for affordable units especially for local people and Solent LEP is therefore reluctant to see a <i>de minimis</i> threshold applied and the affordable component should instead be determined by a viability test</p>
<p>33 Should any particular types of residential development be excluded from this policy?</p>	<p>No comment</p>
<p>34 Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18-219 of the National Planning Policy Framework, together constitute the Government's view of what sustainable development means for the planning system in England?</p>	<p>No comment</p>
<p>35 Do you agree with the proposals to amend</p>	

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<p>national policy to: a) Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures? b) Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?</p>	<p>a) No comment b) No comment</p>
<p>36 Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?</p>	<p>Agree. Flood prevention is a major issue for Solent LEP given our coastal location and exposure to flood risk especially in Southampton and Portsmouth</p>
<p>37 Do you agree with the proposal to amend national policy to emphasise that planning policies and decisions should take account of existing businesses when locating new development nearby and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development?</p>	<p>No comment</p>
<p>38 Do you agree that in incorporating the Written Ministerial Statement on wind energy development into paragraph 98 of the National Planning Policy Framework, no transition period should be included?</p>	<p>No comment</p>