

# Planning reforms from UCL, ACA & POS:

## Permitted Development

### Ideas for reform

### Plan-making reforms

Account of Forum meeting on 4th December 2023 at Assael, 123 Upper Richmond Road SW15 2TL.  
 Minute by Riette Oosthuizen and Michaela Oberhuber of HTA Design  
 also at planninginlondon.com > LP&DF

#### DISCUSSION TOPICS on planning reforms

##### 1 Permitted Development

Professor Ben Clifford of UCL opens a discussion on extending PD rights and the Prior Notification process

**Overview of Adaptive Reuse and Sustainability**  
 The presentation began by addressing the concept of adaptive reuse, focusing on the conversion of under-utilised or vacant commercial buildings, especially offices, into housing. This approach is seen as a way to combat urban decline. It's increasingly linked to sustainability debates due to the significant carbon emissions from buildings. As buildings become more energy-efficient operationally, the focus shifts to reducing embodied carbon.

##### Permitted Development (PD) in the UK

The concept of PD, which has been in place since the 1947 Act, was discussed. PD allows certain minor developments without explicit planning permission from local authorities. Originally, this included small and temporary structures and was



## Extending permitted development in England

### Professor Ben Clifford

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Presentation to London Planning and Development Forum

4 December 2023

based on the proportionality principle, limiting state intervention to developments likely to have significant impact or cause harm.

##### Extending Permitted Development

The government's expansion of PD since 2013 was highlighted, including the significant change in

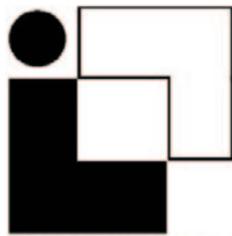
2013 that allowed office-to-residential use under PD. This was made permanent in 2015 with no floor space limit. Additional expansions included conversions from various commercial spaces to residential, with specific size limits, and extensions to light industrial buildings. The introduction of Class E to residential PDR in 2021 increased the

### Meeting held on Monday 4th December 2023 at Assael ATTENDANCE

Brian Waters Chairman  
 Riette Oosthuizen HTA Design  
 Ben Clifford UCL  
 Les Mayhew Bayes Business School  
 Michael Bach London Forum  
 Peter Eversden London Forum  
 Andy Rogers ACA  
 Andrew Catto ACA  
 Robert Fiehn London Society

Richard Diaz Lopez Freeform Architects  
 Stephen Heath Bloomsbury Association  
 Samin Almagableh Asp Architects  
 Nick Ferguson PMA Traffic  
 Deon Lombard Deon Lombard  
 Architects  
 Dewean Rowe TCPA  
 Félicie Kikler Assael  
 Jon Rowles CPRE London

Judith Ryser UDG  
 Suinder Singh Singh Fudge Architects  
 Tim Wacher RICS London  
 Mark Willingale Willingale Associates  
 Philip Waddy West Waddy Architects  
 APOLOGIES  
 Michael Edwards UCL  
 Mike Keily POA  
 Joanna Averly DLUC



ASSOCIATION OF  
CONSULTANT ARCHITECTS

## London Planning & Development Forum

a joint Forum with the ACA

ON MONDAY 4TH DECEMBER 2023 1.30 for 2.00pm  
at Assael, 123 Upper Richmond Road SW15. 2TL (Putney station)  
SEE [www.assael.co.uk](http://www.assael.co.uk)

### DISCUSSION TOPICS on planning reforms

#### 1 Permitted Development

Ben Clifford of UCL will open a discussion on extending PD rights and the Prior Notification process; Louise Drew social housing expert at Shakespeare Martineau

#### 2 Local Plan making

Mike Keily chairman of the Planning Officers' Association, Deirdra Armsby director of place at Westminster City Council will lead the discussion

#### 3 Ideas for planning reform from Parliament and the development sector

Andy Rogers, chair ACA Planning Action Group, Florence Eshalomi MP for Vauxhall and opposition minister at Levelling Up, Thomasin Renshaw of Pocket Living, Daniel Leon of Square Feet Architects and Charlie Collins of Savills will open the discussion.

(Discussed at the last Forum with Mike Meadows of BL their report 'More growth, more homes, more jobs – how to reform the planning system to unlock urban regeneration', was launched by British Land and Landsec, to tackle what they believe to be a planning system that is hindering economic growth. SEE: <http://tinyurl.com/2zk5tp65>)

Thanks to John Assael for his hospitality. Felicie Krikler of Assael invited to join in! Names in pink invited; in dark pink have accepted.

number of eligible buildings for conversion.

#### Recent Proposals for PD

The presentation covered recent proposals from 2023, including extending PD to protected locations, a new Class C1 to residential PDR, and increasing size limits for certain conversions. It also mentioned the Autumn Statement 2023's announcement of a new PD right for subdividing houses into flats without altering the facade.

Prior Approval Processes: The complexities of the prior approval processes under PD were discussed. This includes consideration of various factors such as transport impacts, contamination risks, noise impacts, and compliance with national standards like adequate natural light and space standards. The presentation noted varying practices among local planning authorities (LPAs) in handling these approvals and the strengthened requirements following an independent review.

#### Understanding PD Impacts

Studies examining the impact of PD highlighted concerns such as the loss of planning gain contri-

butions and affordable housing, as well as economic impacts due to commercial space being converted to housing. There were also issues raised about the quality of housing developed under PD rights and their impact on health.

#### Health Impacts of PD Conversions

The presentation delved into the potential health impacts of PD conversions, citing studies that showed lower mental wellbeing among residents in PD housing compared to the general population. Common problems in PD housing included a shortage of space, noise, pollution, and inadequate natural light. The positive correlation between housing quality, particularly space standards, and mental wellbeing was emphasised.

#### Recommendations and New Studies

Recommendations for improving PD housing focused on enforcing space standards, integrated design approaches, better use of Article 4 directions, and enhancing local open space access. A new major study funded by NIHR from 2023-2026 aims to investigate the health and equality

impacts of planning deregulation in England, focusing on PD housing.

#### Current and Proposed PDRs

The presentation highlighted the complexities arising from the range of PD rights, differing prior approval requirements, and frequent amendments to the General Permitted Development Order (GPDO). The current proposals to increase size limits and introduce new PD rights were mentioned, along with questions about the best approaches to protect occupier health without compromising development viability.

#### Local Authority Approaches

The varying approaches of LPAs in handling prior approvals under PD rights were also noted, raising questions about the effectiveness and consistency of these processes across different jurisdictions.

#### Conclusions:

#### Adaptive Reuse, Health, and Wellbeing

The presentation concluded that while adaptive

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>>> reuse of vacant buildings for housing aligns with sustainability and regeneration goals, the quality of PD housing varies, often resulting in poor design. Despite these challenges, the government continues to favour PDRs for creating new housing. There was a call for balancing occupier health and well-being with housing development viability.

#### DISCUSSION

**Complexities in Prior Notification and Building Standards:** The discussion revolved around the challenges in the prior notification process under PD. It was noted that planning policies should not duplicate other regulations, particularly building standards. However, the current practice often involves planning authorities in matters outside their expertise, like building control, leading to inefficiencies and suboptimal outcomes. A clear division of responsibilities between planning and building control to ensure better compliance with building standards and to promote higher living standards was argued.

**Subjective Criteria in Planning Approvals:** The discussion emphasised that subjective aspects, such as the external appearance of upward extensions, should not fall under PD but rather require a full planning application. This approach would allow for a more thorough consideration of contextual and aesthetic factors relevant to urban development.

**From Over-Prescription to Lax Standards:** A shift from highly prescriptive requirements to a more relaxed approach in planning was critiqued. This pendulum swing is seen as a reaction to the housing shortage, resulting in policies that may overlook important aspects of housing quality. Concerns were raised about the mixing of building regulation requirements with planning requirements, leading to scenarios where planners are expected to oversee aspects they are not qualified to handle.

**Building Control and Implementation Challenges:** The conversation also touched on the role of building control in enforcing standards. There was an acknowledgment that effective enforcement is crucial but often hampered by inadequate jurisdiction or oversight. This leads to situations where sub-standard housing developments occur, reminiscent of pre-Victorian standards, with issues like inadequate natural light and poor living conditions.

**Need for Clear Division and Effective Enforcement:** A call for a clearer division between permitted development rights and building regulations is needed. There was a consensus that while PD can facilitate certain developments, it should be subject to stringent building standards. This approach would help in addressing the housing shortage without compromising the quality of living environments and adhering to essential health and safety standards.

## Adaptive reuse

- The conversion of under-utilised or vacant (obsolete) commercial buildings (particularly offices) into other purposes (particularly housing) is commonly proposed in relation to combating urban decline (Wilkinson and Remøy, 2018)
- Often now being linked to sustainability debates, e.g. better use of resources (Armstrong et al, 2021). Buildings are a significant source of global carbon emissions and as they become more energy efficient during their operational phase, embodied carbon becomes a greater concern



## Permitted development

- In the UK, the definition of 'development', in place since the 1947 Act, is wide-ranging so to avoid the system becoming clogged-up with minor matters, there has always been a category of development which does not require planning permission expressly granted by the local planning authority but are rather 'permitted development' (PD)
- This was based on proportionality principle, because state intervention should be based on likelihoods of impact or harm. PD traditionally small and temporary structures

#### Urban Development Focus in London:

- A focus on London's unique challenges in urban development, particularly the trend of converting houses into flats and the transformation of commercial spaces into residential units.
- In inner London, the discussion noted that house-to-flat conversions are less prevalent due to the scarcity of smaller houses. In contrast, outside of London experiences significant tension over these conversions. The participants discuss the defensive attitude of outer London residents towards such changes.

#### Planning Policies and Development Rights:

- Permitted Development Rights (PDR) Impact:** PDR, especially office-to-residential conversions, was discussed extensively. It was noted that these conver-

sions contribute significantly to London's housing supply with the majority stemming from office to residential conversions.

- Housing Quality Concerns:** Participants raise concerns about the quality of housing resulting from PDR conversions, citing issues like reduced unit sizes and inadequate amenities. A specific example includes a planning appeal case involving the division of a house into units, where substantial payment for affordable housing was initially demanded.

- Complexities in Policy and Politics:** The discussion revealed the complexities in planning rights and the influence of political decisions on planning permissions. The varying implementation of these policies by local authorities, and the impact of political points on planning rights, were highlighted.

## Extending permitted development

- Since May 2013, the government have allowed the change of use of offices-to-residential use as permitted development. Initially experimental but made permanent in 2015, with no floorspace limit for the size of conversion
- Added in 2015:
  - Retail, betting office, pay day loan shop, amusement arcade, casino, launderette, hot food takeaway to residential with 150m<sup>2</sup> size limit
  - Storage or distribution centre to residential (500m<sup>2</sup> size limit)
  - Agricultural to residential (450m<sup>2</sup> and 3 unit limit, extended in 2018 to 865m<sup>2</sup> and 5 unit limit)
- 2021 saw Class E to residential PDR introduced, including offices, retail, light industrial, restaurants, cafes, clinics, nurseries, day centres, gyms and recreation centres, all subject to a 1,500m<sup>2</sup> scheme floorspace limit
- In research published by the TCPA in 2021, we looked at the new right in four case study authorities (Barnet, Crawley, Huntingdonshire, Leicester). Estimated that introducing this right saw a 33.6% increase in number of buildings eligible at least in part to convert and increasing the floorspace eligible for conversion by 127.7%
- 80.3% of buildings paying business rates (most non-domestic buildings) potentially eligible at least in part for conversion under PDR
- July 2023 report from APPGs on housing market and ending homelessness supportive of converting commercial buildings to residential to help meet housing need, but raises concern over affordability requirements and quality
- Summer 2023 on extending / amending PDRs
- Proposal for Class E to residential size limit: double to 3,000m<sup>2</sup> or remove floorspace limit altogether, proposal also to remove 3 month vacancy requirement
- Proposal to extend the PDR to apply in protected locations including National Parks
- Proposal for a new Class C1 (hotels and boarding houses) to residential PDR

### Challenges in Planning and Development:

- **Challenges for Local Authorities:** The conversation highlighted local authorities' struggles with planning, including resource constraints and balancing development with community interests. A specific example is given of Richmond, where maintenance and upgrade issues lead to poor living conditions.

- **Developers' Perspective:** Developers face challenges in navigating the planning system, with issues around obtaining planning permissions and bureaucratic delays. A notable point is the discrepancy between applications for prior approval and actual construction, reflecting the unpredictability of the process.

### Community Impact and Public Opinion:

- **Effects on Local Communities:** The broader impact of urban development on communities includes housing quality, access to services, and preservation of neighbourhood character. An example discussed is the conversion of shops into residences, leading to inadequate living conditions due to poor natural lighting and ventilation.

- **Influence of Public Sentiment:** The role of public opinion in shaping planning decisions is significant, as local sentiments can greatly influence the outcomes of development projects. The conversation underscored the need for local authorities to take a consistent approach to prior approval and apply permitted development controls effectively.

### Suggestions for Future Planning Practices:

- **Improvement Proposals:** Suggestions for improving urban planning include simplifying the planning process to make it more efficient and transparent, enhancing the resources and capabilities of local planning authorities, and adopting innovative, community-centric development approaches were discussed.

- **Addressing Housing Demand:** The persistent need for more housing in London and the challenges of meeting this demand within the existing planning framework were discussed. The conversation suggests the need for policy reform and the introduction of new development strategies.

- **Balancing Development and Preservation:** Emphasis is placed on maintaining a balance between new development and the preservation of local character. The discussion included the need for more age-friendly housing options and the consideration of retirement communities in urban areas.

### Additional Insights from the Conversation:

- **Planning Permissions and Appeals Process:** The forum cited examples where planning permissions and appeals have been unpredictable or influenced by external factors, such as political pressure.

• **Resource Allocation in Local Authorities:** The >>>

allocation of resources within local authorities and its impact on the effectiveness of planning policy implementation was discussed, with a focus on the need for more determination to prevent unsuitable developments.

- Local Politics in Planning:** The influence of local politics on planning decisions was debated, including potential conflicts of interest and the impact of political leadership on planning outcomes. The discussion also touched on the tension between national policies and local implementation. ■

#### DISCUSSION TOPICS

## 2 Ideas for Planning Reform led by Andy Rogers of the ACA

Three ways to improve planning were outlined. These are based on the wide-ranging experience of members of the RTPI's Planning Consultants' Network, the ACA's Planning Manifesto and the recent British Land / Landsec publication More Growth, more homes, more jobs.

Firstly (and as the government has it seems belatedly realised, although whether £100,000 for each English authority will make a real difference is doubtful) Local Planning Authorities must be better resourced, by providing more and better-qualified planning officers (it used to be a fact that your planning application had a one in ten chance of being processed by a qualified planner - not sure about that now but it's likely to be worse, especially at validation). And resourcing should include the proper monitoring and regulation of pre-application procedures, as well as the mandatory training of planning committee members.

Secondly there should be clearer zoning of land to include a focus on brownfield urban regeneration and realistic grading of green belts, together with a further simplification of the Use Classes Order. These changes could make the release of development land easier and should be introduced alongside the removal of technical matters that are covered by other legislation, such as building and public health regulations, from the information required when submitting a planning application.

Thirdly, to follow the reduction of onerous development control work by the removal of technical matters from planning applications, the government should continue its widening of permitted development rights and implement the introduction of properly qualified local agents to process planning applications, which could also be streamlined to just three levels: outline approval (as per the current PiP system), full planning and approved for construction.

Agents would be used to assess the more straightforward applications and make recommendations for approval or rejection - in the same way that planning inspectors work but with the LPA making the final decision. ■



## Article 4 Directions (as in July 2023)

Borough	E to resi?	Other?	Borough	E to resi?	Other?
Barking and Dagenham	No	HMOs, upward ext	Greenwich	Yes	HMOs
Barnet	No	HMOs	Hackney	Yes	Storage Launderettes
Bexley	No	HMOs	Hammersmith & Fulham	No	Basements
Brent	Yes	HMOs	Haringey	No	HMOs Storage
Bromley	Yes	Upward ext	Harrow	No	
Camden	Yes	Launderettes Basements	Havering	No	HMOs
City	Yes		Hillingdon	Yes	Upward ext
Croydon	No	HMOs	Hounslow	No	HMOs
Ealing	No		Islington	Yes	
Enfield	No	HMOs			
Kensington & Chelsea	Yes	Launderettes Basements	Tower Hamlets	Yes	HMOs
Kingston	Yes		Waltham Forest	Yes	HMOs
Lambeth	Yes		Wandsworth	Yes	Public house
Lewisham	Under prep		Westminster	Yes	Basements
Merton	No	HMOs			
Newham	No	HMOs			
Redbridge	No	HMOs Storage			
Richmond	Yes	Basements			
Southwark	Yes	HMOs Public house			
Sutton	No				

## Conclusions

- Existing strong evidence on the relationship between housing and health. PD housing varies in quality – there are actually some very good schemes – but has often associated with poor quality design.
- Controversy over lack of planning gain (although new Infrastructure Levy would apply to PD conversions)
- Nevertheless, government continues to favour use of PDRs to support creation of new housing – so this is unlikely to go away
- Adaptive reuse of vacant buildings can be good for sustainability and local regeneration so in principle is a positive thing

## DISCUSSION TOPICS

### 3 Plan-making reforms led by Mike Kiely\*, chair of the Planning Officers Society

The Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms was published 25 July 2023 for 12 weeks until 18 October 2023.

There were three omissions that made commenting on this publication a challenge:

1. Details of the Alignment Test
2. NDMP – National Development Management Policies
3. A post-NDMP NPPF

#### Alignment Test

Potentially a good idea, but there have been no details from DLUHC about how it's going to work. If Inspectors into Local Plans are going to try to fix strategic issues using this test, which is welcomed, they will struggle to do so without all the relevant local plans before them. POS has proposed to government how this could be done – more on that later.

#### NDMP

Again, potentially a good idea, but if we are going to keep a plan led system, there must be room for local nuance where that is necessary. POS agrees with the principle of NDMPs, as repeating them in Local Plans serves no purpose other than giving them s38(6) status. With amendments to this section through the LURA, NDMP will have the same status as a Local Plan policy (LPP). However, the LURA says that if there is a conflict between a NDMP and LPP it will always be settled in favour of the NDMP. POS thinks that this is wrong. The most up-to-date policy should have precedence (s38(5) requires that where there are conflicts between policies in different development plans) and that is what the LURA should have said about conflicts between NDMP and LPP. The Local Plan Regulations should have been amended to say that in examining the policies in a local plan the Inspector should delete policies that merely repeat NDMP unless the difference is demonstrated to be necessary by the LPA given its local circumstances. Unfortunately, DLUHC has ruined something that had the potential to be an improvement to the spatial planning and decision-making processes and instead has pulled significant power to the centre and considerably diluted a locally led, planning system.

#### New NPPF

When DLUHC produces its NDMP we will also see a redrafted NPPF which will mainly be focused on

the plan-making side of the system. Without this, it felt like we were commenting on these proposals in a national policy vacuum. In fact we haven't even seen the current variations to the NPPF that were consulted on nearly a year ago (22 December 2022) and we were promised the results in Spring 2023. Even in the weird world of DLUHC seasons, we are way past Spring!

#### The principal consultation take-aways

The main features and our views were:

- 30-month target: when you start and finish measuring this will be vital. The evidence gathering and analysis stage shouldn't be included. It should also not include the Examination (but it seems to) as this is outside the control of the LPA. The rules around consultations need to be clearer and LPAs should be able to amend the plan (in response to consultation responses) after Reg 19 which they can't do now. Nevertheless, POS struggles to see how this target can be achievable without significant simplification of the plan-making system, which does not seem to be what is proposed.

- The evidence gathering changes are welcomed and we await the production of centrally curated evidence so that LPAs in England don't have to procure

### **Whilst there is much to recommend in this DLUHC consultation, there is far more that is missing or misguided. POS is ready to work with government, this one or the next, to improve the planning system so that it can do its job of delivering sustainable development**

317 different versions of essentially the same thing. It is important that the evidence for a plan is frozen at the start of the plan-making process to save wasted time and money in always having to have the latest numbers. In truth, the small differences that such data updates add rarely make a material difference to a plan. Much of the evidence that is used are at best estimates of what the future may hold, rather than predictions of the future. We need to stop treating evidence as the latter and start to see it as a systematic process that provides a basis that is good enough upon which to plan.

- The consultation proposed a series of three Gateways to manage the plan-making process to ensure that it sets off in the right direction, meets the legal and procedural requirements and that it sticks to its timetable. Whilst the Gateways seem appropri-

ate, they are prescribed quite widely and we have a fear that they could become a bit meaningless, although we would expect more detailed advice to come forward from DLUHC that should avoid this. A further fear is that the person making judgements at each Gateway must be the same person for reasons of consistency. We don't want one inspector/examiner saying one thing and the next one disagreeing. Our main worry, apart from the additional cost of all this additional PINS involvement, is does PINS have the resources to deliver these new checks in a timely manner. Their current performance clearly suggests not.

- PIDs (Project Initiation Documents) replacing SCI (Statement of Community Involvement) is broadly welcomed as a PID sets out a wider range of matters relevant to a project (which is how LPAs should see the Local Plan making process) than a SCI, which just looks at community involvement. Some commentators have pointed out that SCI also deal with the DM process but, in reality, much of what an LPA does in DM is governed by statute and secondary legislation as well as being specified in Council Constitutions (especially around committee procedures such as public speaking). It is not uncommon for the DM side of a SCI to be out of step with either legislative or constitutional provisions, so a lighter touch to this area is to be welcomed.

- POS considers that the proposals around Supplementary Plans are a sledgehammer to crack a nut. The problem that the proposals are designed to address is a fault in the wording of the Local Plans Regulations that unintentionally limit what an SPD (Supplementary Planning Document) can deal with. Rather than just fix those regulations, DLUHC has produced a new product that is overengineered (in terms of procedures for what it is trying to do) and is unlikely to be used. POS has proposed a better way of dealing with this which I will introduce in the next section.

- The emphasis that a Local Plan should be vision led and outcome focused is very welcome, but POS considers this to be a job half done. Our proposals for strategic and spatial planning are set out next.

#### What POS would have proposed?

POS considers that our plan-making system has been broken since 2011 and needs to be fixed. There are two fundamental problems: we don't plan strategically anymore, and we have a standard methodology for assessing housing need that is not fit for purpose.

DLUHC's current position is that strategic planning should be voluntary, and POS cannot understand how government can hold such a position. Strategic planning is vital, should be compulsory and based on a city-region approach, rather than the old regions from the 1960s. When planning for an area, the main decisions will be based on employment >>>

>>> patterns and housing needs. Most employment activity is focused on cities and people's housing choices are invariably linked to their employment circumstance, so we think it makes sense.

These groupings of LPAs should be required to produce a joint strategic plan across that regional geography. Decision making in these new structures must be by voting and not consensus – the current consensual model has not worked in nearly all cases, often because just one local authority says no and pulls out. The purpose of the plan, with respect to housing, would be to calculate housing need using a new standard methodology. That process would be done with "policy off" and not make any distribution decisions at that initial stage. It would produce the number of households needed to meet need and attempt to identify household sizes and typologies. This is not to suggest that housing is the only matter that needs to be planned for strategically!

**POS supports the principle of having a Standard Method for assessing the actual level of housing need in a locality. The current Standard Method does not do that for the following reasons:**

1. It is based on out-of-date data – 2014 ONS data. The reason is that subsequent data sets gave lower numbers, and the sum total of all Councils' housing need figures did not get government to its 300,000 target. Any method must be based on the latest data – to do otherwise undermines the methodology. We now have 2021 census data, rather than ONS estimates, and that must be used.

2. The Affordability Factor makes no sense: if you have estimated how many homes you need – who are the additional homes driven by the Affordability Factor for – second homes? Housing does not operate as a commodity but as an asset which has different economic drivers. See our Manifesto Background Paper 13: Addressing the Housing Crisis[1] for more details.

3. The 35% increase for the 20 largest conurbations is completely arbitrary and is not based on any evidence. Planning for housing in London, and many other large cities, has been based on a capacity-based approach and without a wholesale review of the Green Belt coupled with significant densification in the suburbs, the housing numbers produced for the Capital by the Standard Method are undeliverable. The same applies to the other conurbations and cities.

**A Standard Method must be based on sound demographic methodologies that seek to estimate the following:**

- The growth of the population: births over deaths. It is considered that ONS generally do a sound job of estimating the level of growth between censuses at larger geographies but when it gets down to the Local Authority level it can become unreliable

and needs local knowledge (eg of significant new housing developments) to produce accurate predictions. That is why this exercise must be done at a larger regional geography.

- The net migration into or out of an area. Much of this will be movement within the UK (mainly between large cities and their hinterlands and from poorly performing areas into economically more successful areas) with an element being international migration. It is also considered that ONS do a sound job here, except for London where the GLA's statistical methods are considered more accurate for the unique characteristics of the Capital. Again, reliable data can only be produced at a large geography.

- An estimate of the level of hidden households: the number of people who want to have their own home but cannot afford one and so are still living with their parents or in other households, or they are homeless or being emergency housed by Local Authorities. This is the most challenging aspect to estimate, but census and electoral role data coupled with housing waiting lists and other data can be used to provide sound methods that are locally responsive, rather than an arbitrary national measure.

**Having identified the scale of the population that will need to be housed over the plan period, we must then convert it into households so that the number and type of homes needed can be specified and planned spatially.**

In doing this, it will be important to identify the areas of specialist housing that will be needed, such as housing for students and the elderly, so that appropriate provision can be made.

In many ways this is the most important part of the process because it is the foundation upon which everything else is built. It is essential that LPAs are dealing with numbers that are realistic because they need to have a conversation with their local politicians and communities along the lines, "this is the number of extra people we will have to house in the future and this equates to this many homes of these types, so how can we house our children, and our children's children." Currently the conversation is more along the lines, "we have this number from government that has no empirical basis, but if we don't meet it, they will punish us." Is it any wonder that we have got into such a mess over planning for housing? Without a sound basis for starting the conversation of how many homes we need to build to house our population, everything falls apart, as we have seen.

The process of broadly distributing these homes can start once the quantum and nature has been calculated and this is when you turn "policy on". An LPA will need to make sure that they have sweated their brownfield opportunities first before starting to look at greenfield options. At such a larger geography, appropriate strategic decisions can be made about

what is the best way to accommodate growth that cannot be accommodated within existing built-up areas. This will inevitably involve a strategic review of any Green Belt and POS has set out in its Manifesto Background Paper 3: We need to talk about the Green Belt[2] the best way to do this.

The Strategic Plan should be examined using the current/proposed procedures: SEA, Alignment Test, NPPF conformity etc and Examined by an Inspector. The aim, as government seems to be proposing in its consultation, should be to fix problems to get a plan in place. We have let the best be the enemy of the good and we should stop doing that.

With a Strategic Plan in place the detailed local policy framework will need to be put in place. POS considers that with a sound strategic planning process and a suite of NDMPs, the rest of the process should be very locally specific. We advocate a lighter touch process, similar to the current SPD process, with PINS only being involved to deal with outstanding objections. This was how plans were examined in the pre 2008 system, so it has precedence. In the new model, if PINS, on checking the representations on a local plan and agreeing that that there are no outstanding material objections, the LPA would be free to adopt the plan without the need for an examination. If an examination is necessary, in most cases this could be done via written representations we think. This approach would save considerable time and money, streamline the process whilst safeguarding local participation. Full details of these recommendations are set out in our Manifesto Background Paper 9: Spatial Planning: simplifying the process[3].

## Conclusions

Whilst there is much to recommend in this DLUHC consultation, there is far more that is missing or misguided. POS is ready to work with government, this one or the next, to improve the planning system so that it can do its job of delivering sustainable development.

(*\*Mike was unexpectedly unable to attend but provided us with this text*)

## Footnotes

[1] [https://www.planningofficers.org.uk/uploads/POS-MBP13-Housing%20Crisis\(1\).pdf](https://www.planningofficers.org.uk/uploads/POS-MBP13-Housing%20Crisis(1).pdf)

[2] <https://www.planningofficers.org.uk/uploads/POS%20MBP3%20Green%20Belt.pdf>

[3] <https://www.planningofficers.org.uk/uploads/POS%20MBP9%20Spatial%20Planning.pdf>

