



The countryside charity Staffordshire

Representations of CPRE Staffordshire, the countryside charity

This response to the South Staffordshire Local Plan Preferred Options consultation is submitted on behalf of the Staffordshire branch of the Campaign to Protect Rural England (CPRE). Established in 1936, CPRE Staffordshire is a registered charity that campaigns for a thriving countryside that benefits everyone.

In the first instance we applaud South Staffordshire District Council for progressing their ambition to have a well-considered Plan. Our concerns regarding the current draft fall into two broad areas: firstly, that the Plan accepts too high a level of overspill from the adjacent conurbation, when the need is yet to be established, and, secondly, that too much greenfield and especially Green Belt land is being allocated for new housing, more than is necessary. We are especially concerned that the exceptional circumstances test for the deletion of Green Belt land does not appear to be made out. These topics are dealt with below.

Our representations below relate to the issues which we consider to be key at this stage of the Plan. We recognize that there is likely to be legislative change in the current session of Parliament, but this may not have become effective before the next stage of the Plan's preparation.

On 8th November 2021, Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities, was questioned by the [Housing, Communities and Local Government Committee](#). See [Appendix 3](#) for extracts of relevant questions and answers.

What is also uncertain is whether the Duty to Cooperate will be retained in the new Act and whether S106 Agreements and CIL will be abandoned as intended by the Planning Reform White Paper of 2020. (The zoning element of the White Paper does seem to have been dropped by Michael Gove, the new Secretary of State).

We also acknowledge that the method for calculating housing requirements may be changed yet again. The answer to Q85 in [Appendix 3](#) is particularly relevant to South Staffordshire.

Allocation of housing land to meet the needs of South Staffordshire

We recognize that most councils, including South Staffordshire, have accepted the use of the Government's 'New Standard Method' to decide housing requirements. However, your provision is much higher than this, which does not seem to be clearly explained in the document.

The proposed allocations are well in excess of what is required to meet the numbers from the 'New Standard Method', leading to unnecessary development - mainly in the Green Belt but also outside it (at Penkridge and Stafford). [Table 1](#) below shows our calculations.

We think that your methodology for distributing additional housing in South Staffordshire – the Tiering - is reasoned, but the same cannot be said for the allocations to serve the Black Country. We are of the strong view that the allocations to provide for South Staffordshire's needs should be separated from the allocations for the Black Country councils.

Our colleagues at CPRE West Midlands commissioned a planning consultant to look closely at the calculations used and the assumptions made (see the [Report on Urban Capacity and Green Belt Material](#) and [Update on Urban Capacity](#)). We question the scale of overspill from the Black Country and ask you to review this.

Windfalls

We are concerned that the council is severely understating windfall provision by only including 'small sites' and think that windfall allowances should take account history of the development of all unallocated sites permitted for housing on South Staffordshire. These have made, and continue to make, a significant contribution to housing supply.

The windfall allowance is for 450 over the plan period, but you appear to have been averaging 47 dpa on small sites. However, as the steady average windfall completion rate is 100 dpa we suggest that it should be 1500 over the 15 years, discounting two years from now.

We feel that by making allowance only for 'small sites' the council is increasing the need for more allocations and more loss of Green Belt.

Five year housing land supply

We also recommend that the 5 year housing supply calculations used under the NPPF should be based only on housing provision for South Staffordshire as calculated using the Government's approved standard method and used in the Preferred Options - 243 per annum.

If the Black Country allocations were included in the 5 year supply, this would increase the annual requirements by 235p.a. (4000 divided by 17 years) and would give an annual total of 476 new homes. This would be unachievable in the short and medium term and would cause more appeals, leading to

developments on unallocated sites being allowed – as you have already experienced in South Staffordshire.

Brownfield first please

We consider that brownfield sites and other sites in the Black Country should be developed before Green Belt and greenfield sites in South Staffordshire and that this should be covered in a Memorandum of Understanding with the Black Country authorities.

The Department for Levelling Up, Housing and Communities said: “We welcome the CPRE’s commitment to focus on brownfield, which is an absolute priority for the government.” (See The Times, 18 November 18 2021, quoted in full in [Appendix 1](#)).

We recognise that brownfield land within South Staffordshire is limited but is plentiful in the Black Country. By allowing development on greenfield sites, which the development industry prefers, it makes it more difficult to encourage the development of brownfield land.

(See [Appendix 2](#) for more information on CPRE’s position on brownfield).

Green Belt

We suggest that the release of land in the Green Belt to serve the Black Country should only be done if essential.

Development within the Green Belt must retain its character and openness. Inappropriate development is, by definition, harmful to the Green Belt and will not be supported except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and other harm, is clearly outweighed by other considerations.

(SSC Preferred Options para 4.4)

We again strongly advise and request that the allocations in Green Belt to meet the requirements of South Staffordshire should be separated from the provision to meet Black Country needs.

Over Allocation

In its Preferred Options, we consider that South Staffordshire Council is over-allocating land for housing. Using its own figures on pages 32 and 33 we see a ‘new requirements total of 1032 for South Staffordshire alone to the end of the plan period in 2038.

By our calculation using your figures the minimum total proposed is 7001 - see [Table 1](#) below.

Even allowing for 4000 to provide overspill capacity for the Black Country, this leaves overprovision of 1969 (7001 – 1032 – 4000) This indicates an unnecessary loss of greenfield and Green Belt sites.

We appreciate that some councils, including yours, add numbers to provide 'flexibility'. However, in our experience councils underestimate the market and find that, in practice, delivery exceeds projections in most cases and 'flexibility allowances' lead to over-provision.

One of the other reasons sometimes used to justify overprovision is "in case development does not come forward on allocated sites". We do not consider this to be defensible as plans are reviewed frequently enough to allow sites to be de-allocated and replaced by new allocations if an allocated site does not come forward (as has very occasionally happened in some rural council areas).

More often, sites come forward but the expected capacity is exceeded, further adding to overprovision. (We note that this is recognised in the preferred options and that all allocations are referred to as 'minimum').

Allocation of housing land to meet the needs of the Black Country

Our CPRE colleagues in the West Midlands have commissioned a planning consultant to examine the housing numbers proposed in the West Midlands and the study in the Black Country. The results examine the scale of new housing and challenge the assessments made.

In essence the reports question the need for the displacement of housing development in adjacent councils such as South Staffordshire and in this circumstance, we would argue that South Staffordshire Council should not accept 4,000 from the Black Country now. In view of the consequences for loss of Green Belt, any addition claiming 'exceptional circumstances' should be subject to further review.

We recognise, however, that South Staffordshire Council has previously agreed to allocate land both for its own needs and for an additional 4000 new homes to provide additional capacity for housing to serve the Black Country Councils under the current Duty to Cooperate. Our comments later in this representation relate to the document as published.

We accept that if provision is to be made to provide housing to serve the Black Country the sites should be located in close proximity to the conurbation. Three have been identified in the plan are on, or very close to the edge of the Black Country Authorities boundaries.

1. Linthouse Lane - at least 1976 new homes (1200 in the Plan Period)

4.34 Housing growth in this part of the district will be driven by a large-scale housing site (land north of Linthouse Lane) adjacent to the

northern edge of the Black Country urban area. Growth in this area will deliver significant housing alongside a mix of other uses, including a new primary school, local retail and strategic green infrastructure. Delivering housing growth in this location recognises the infrastructure that could be facilitated on a larger strategic housing site and the area's proximity to the higher order services and facilities in the cities and towns of the Black Country.

2. Cross Green - at least 1200 new homes

4.27 Housing growth in this part of the district will be driven by a large-scale housing site at Land at Cross Green. Growth in this area will deliver significant housing alongside a mix of other uses, including a new primary school, local retail and strategic green infrastructure. It also provides the opportunity to safeguard land to deliver the rail-based parkway opportunity identified in the district's existing Core Strategy adjacent to the West Coast Mainline. Delivering housing growth in this location recognises the recommendations for a strategic housing site in this area in the GBHMA Strategic Growth Study and the area's proximity to significant employment opportunities at the i54 and ROF Featherstone strategic employment sites. It also recognises the infrastructure that could be facilitated by large scale growth and the area's proximity to the City of Wolverhampton, with its associated services and employment opportunities.

3. Langley Road - at least 390 new homes

4.44 Housing growth will be delivered adjacent to the western edge of the Black Country, allowing for the limited expansion of the Black Country urban area. This will be delivered through a smaller urban extension to the Black Country, directed onto a less constrained site option within the Green Belt.

4.45 This area provides an opportunity to accommodate housing growth directly adjacent to the towns and cities within the Black Country, in a location identified as a strategic priority for dispersed housing growth in the GBHMA Strategic Growth Study. These factors have been balanced against the poorer access to employment via sustainable transport measures in this broad location and the lack of larger scale site options to deliver sustainable mixed-use growth in this area. The extent of land adjacent to Dudley Metropolitan Borough Council has also informed the level of growth allocated in this area, as Dudley MBC has a relatively limited unmet housing need and significant Green Belt opportunities within its own administrative boundaries to address this need.

This gives a total of 2790 new homes (1200+1200+390) in the plan period - which leaves 1210 to be found to meet the apparent commitment to the Black Country councils outside the immediate area of the Black Country. (This does

not take account of the additional 776 homes at Linthouse Lane as they have been excluded from SSDC calculations).

No other sites have been identified to meet the specific commitment. It is accepted that it may be said that the major growth of Penkridge or at Stafford (see Note* below) could meet the commitment, but this does not seem to be made clear in the document.

We again suggest and request that the allocations for the needs of the Black Country should be identified separately to those to meet the needs of South Staffordshire. This would allow a coordinated approach to be taken regarding the provision of infrastructure linked to that of the adjacent metropolitan authorities (e.g. for schools, transport infrastructure, community uses, local retail provision etc), to provide S106 and CIL contributions appropriately and for the New Homes Bonus to be equitably shared.

Note*

We are very surprised that Stafford Borough Council has requested, or is supporting, the proposed allocation at Stafford under the Duty to Cooperate - as the Council is already providing housing massively in excess of its own requirements to serve adjacent councils, including South Staffordshire.

Stafford Borough Local Plan 2011 – 2031 reads:

*6.12 It should be noted that the household projection figure is made up of 'local need' (i.e. natural change: the balance of births over deaths and reduction in average household size) and 'in-migration' elements, with the split for Stafford Borough being approximately 30% local need **and 70% in-migration mainly from surrounding areas**, the majority being from Cannock Chase District, **South Staffordshire District** and the City of Stoke-on-Trent. The Government, through the NPPF, has stated that local authorities should provide for the locally assessed requirements of their area. Pressures for continued in-migration are likely to remain from neighbouring areas in the short to medium term. In light of meeting objectively assessed needs it is sensible to plan for these, not least because it is consistent with the growth aspirations for Stafford town, and its developing sub-regional role, as set out in the Spatial Vision and Key Objectives earlier. **This approach has also been supported by neighbouring local authorities** through Duty to Co-operate cross-border meetings on the Plan for Stafford Borough: Strategic Policy Choices document.*

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Plan%20for%20Stafford%20Borough/PFSB-Adoption.pdf>

Stafford Borough Council and other parties have previously objected to the application for the development of this greenfield site for housing. This was refused by your council and the subsequent appeal was withdrawn by the appellants (Gladman).

Stafford Borough Council is already providing housing numbers well in excess of its own target of 500dpa. Since 2001, the start of its plan period,

completions have been an average of 620p.a. (See Land for New Homes 2021¹, Page 8 Table 2), particularly focused in Stafford Town.

1

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Monitoring/Land%20for%20New%20Homes%202021%20FINAL.pdf>

Table 1

Housing Requirements for South Staffordshire alone

We have looked at the figures in your Preferred Options document and consider that new allocations could be drastically reduced.

Using your table on pages 32 and 33 of the Preferred Options document

1. Completions 2019 – 2021	750
2. Existing permissions and allocations*	2628 (1151+723+466+30+258)
3. Small Windfall Allowance	450**
4. Sub-total	3828 (750+2628+450)
5. Housing requirements for South Staffordshire using Revised Standard Method (243 p.a.)	4860 (243x20 years)
6. Total of 1. to 5. above	10811
7. New allocations required to meet South Staffordshire requirements (5.- 4.)	1032 (4860-3828)
8. New allocations proposed on Green Belt safeguarded land	1635 (890+624+104+17)
9. Other new allocations (mainly Green Belt)	5348 (1939+370+81+1200+1200+390+168)
10. Total of new allocations	7001
11. Deduct allocation required to meet Staffordshire deficit	1032
12 Deduct allocation for Black Country overspill	4000
Total (11+12)	5032
Surplus provision	1969

*No allowances made for either for increases/decreases in numbers above existing permissions and allocations or for non-implementation of existing permissions and allocations.

**We consider that this is inadequate as it only includes small sites.

Appendix 1

The Times. Thursday November 18 2021.

George Grylls, Political Reporter

Rural areas are being concreted over by “wasteful and immoral” developers who are refusing to build on brownfield land that could accommodate 1.2 million homes, a charity has said.

Housebuilders are increasingly favouring cheaper greenfield sites despite more brownfield land becoming available every year, a study by CPRE, the countryside charity, has found.

London has enough derelict sites to accommodate more than 350,000 houses — more than the government’s annual housebuilding target for the entire country. In the northwest there is enough brownfield land to build close to 170,000 homes. Despite this the proportion of brownfield housing units with planning permission has decreased in the past year from 53 per cent to 44 per cent.

In total CPRE has found that there is enough brownfield land for 1.16 million houses, an almost 10 per cent increase on last year.

Boris Johnson has promised to encourage more development in inner-city areas in the North and Midlands to alleviate the “overheating” market in the southeast. In his speech to the Conservative Party conference last month he said that homeowners in commuter areas lived with “the constant anxiety that [their] immemorial view of chalk downland is going to be desecrated by ugly new homes”. In the budget, the government announced a £1.8 billion fund to regenerate brownfield land for 160,000 homes.

The study comes after ministers were forced to concede to a rebellion from Conservative backbenchers who objected to proposals to rip up the planning system in an attempt to build more houses.

Residents would have been prevented from objecting to developments in their area and councils would have had to meet mandatory housebuilding targets under the proposals announced last year. Faced with a backlash from Tory MPs, the reforms were watered down and Robert Jenrick was replaced as housing secretary by Michael Gove.

Since his appointment two months ago, Gove has sought to distance himself from his predecessor by emphasising the need to regenerate brownfield sites. He has criticised the “out of date” algorithm that hits rural councils with housebuilding targets and made a commitment to devising a formula that moves development away from traditionally Conservative-voting areas. He told MPs last month that he wanted a “brownfield-first policy”.

The former Boddingtons Brewery has only just started to undergo development after lying vacant since 2004 despite being in the centre of Manchester, whereas the local authority is proposing to build on more than

169 acres of greenbelt land in Carrington Moss to create 5,000 homes, 380,000 square metres of warehousing and four main roads.

The Department for Levelling Up, Housing and Communities said: “We welcome the CPRE’s commitment to focus on brownfield, which is an absolute priority for the government.”

Appendix 2

Recycling our land: State of Brownfield 2021

https://www.cpre.org.uk/wp-content/uploads/2021/11/Nov-2021_CPRE_Recycling-our-land_brownfields-report.pdf

Planning news - 25 November 2021

Published: Thursday, 25th November 2021

'Comprehensive' brownfield-first policy needed in NPPF, says report

A comprehensive brownfield-first policy should be set out in the National Planning Policy Framework (NPPF) and brownfield-targeted housing funds established to enable levelling up across England.

These are recommendations set out in countryside charity CPRE's report *Recycling our Land: State of Brownfield 2021*, launched at an online event on 18 November.

The CPRE says there is an increase in brownfield land available for redevelopment, but that a smaller proportion of it has been granted planning permission over the past 12 months.

The report suggests the proportion of brownfield housing with planning permission is 44 per cent in 2021, down from 53 per cent in 2020. The actual number – 506,000 – is the lowest with permission for four years.

Speaking at the launch, Paul Miner, CPRE head of land use and planning, said planning policies insisting that brownfield sites should be developed before greenfields are needed.

To prevent the countryside being developed, CPRE is calling for new national planning policies that prioritise brownfield land development in local plans. These should be part of a package of "fresh" levelling-up investments, particularly for the North and the Midlands.

The charity explains that its analysis of 330 local authority brownfield registers shows a "glut of disused and derelict land available in areas that need the most support". For example, the North West, Yorkshire and the Humber, and the West Midlands have space for more than 375,000 homes on previously used land.

Emma Bridgewater, president of CPRE, said: "A brownfield-first policy is sound, good sense. We need to direct councils and developers to use these sites – often in town and city centres where housing need is most acute – before any greenfield land can be released. It is wasteful and immoral to abandon our former industrial heartlands where factories and outdated housing have fallen into disrepair. Developing brownfield is a win-win solution that holds back the tide of new buildings on pristine countryside and aids urban regeneration at a stroke."

Recycling our Land: State of Brownfield 2021 recommends:

- Introducing a comprehensive brownfield-first policy in the NPPF that prioritises and harnesses the full potential of brownfield land development before any greenfield or green belt land is considered.
- Incentivising through focusing New Homes Bonus payments on developments that deliver on brownfield land and provide affordable homes to allow for brownfield land to serve the needs and regeneration of the North and Midlands.
- Providing local communities with stronger mechanisms to bring brownfield land forward as a source of land supply, such as increased compulsory purchase powers.

- Local authorities should also have increased control of the order in which development land is built so that suitable brownfield sites are developed first.
- Retaining local communities' ability to comment on planning applications and local authorities' ability to refuse developments on brownfield land, and provide legal guarantees that require developers to deliver agreed design standards.
 - Amending the NPPF to ensure national planning policy requires that all new developments have a diversity of housing tenures and types as outlined by the 2018 Independent Review of Build Out.

CPRE says that focusing development primarily on suitable urban brownfield means that housing is near places of work with transport infrastructure, such as public transport, schools and shops already established. This would in turn reduce car dependence.

The report also states that brownfield land that is "important for biodiversity or is a local playground, for example, should not be recorded on the register unless that value is not affected by redevelopment".

Live from the event

Christopher Pincher MP, housing minister:

Pincher maintained that making the best use of brownfield is at the heart of what the government is trying to achieve in delivering new homes.

"The new secretary of state has already met with a number of key stakeholders to express the point that we need to make full use of brownfield sites because often they're in the most sustainable locations – they are near to infrastructure, transport hubs to the places where people need to be.

"Often, councils require additional support to maximise their use. We recognise that and we want to support councils and mayoral combined authorities in doing that. That is why we last year allocated £400 million in the Brownfield Regeneration Fund, which went largely to places in the North and the Midlands."

Pincher thinks that more can be done in the area of brownfield registers. "I hear anecdotally that the brownfield registers can sometimes be inconsistent, that some authorities are more, shall we say, muscular than others in approaching the market and trying to identify the maximum number of brownfield sites that can come forward for allocation. I think we can do more with local authorities and MCAs to advance brownfield land registers."

He also emphasised design standards. "I think that's very important because experience tells us good design – beautiful design if you will, is one which is very sensitive to local concerns."

On the benefits of neighbourhood plans, of which he is "very much in favour", the housing minister said: "One is that they are particularly engaging. We all know that there are challenges with community engagement in local plan-making but when it comes to neighbourhood plans more people tend to become involved and that's a very good thing and I think we need to harness that. I think neighbourhood plans can be very good for identifying additional places for homes in the right places. They can also contribute toward design coding. But we don't have enough of them. They tend to be in more rural places and they tend to be – this is a little bit of a crude yardstick – they tend to be in the South rather than the Midlands and the North. So what we need to do is to find ways of getting them into more urban, more Midlands and Northern places as well.

"There is a more complicated set of steps that we need to take in order to make brownfield-first a reality. For brownfield-first you've got to have a planning system that encourages the

opportunity for brownfield sites to be identified and brought forward. We know that the planning system, which has many great attributes, also has some demerits as it's become more complicated and slow over the 73 years that it's existed. And if we're going to focus on getting brownfield sites, which often require more remediation, further up the queue in terms of preference then we've got to have a speedier system. We've also got to have more SMEs available with an appetite to develop because it tends to be SME developers that take the smaller parcels of land in the less desirable places from a developers point of view to develop into good-quality homes. We've got to make sure that we've got the mechanisms that encourage SMEs as well. We've also got to make sure that we've got good, sensible targeted remediation strategies. So we will be amplifying the focus on brownfield."

Rose Grayston, senior programme manager – housing, at the New Economics Foundation:

"Homes England must be empowered to focus on retrofitting, regeneration and long-term placemaking with new funding streams," said Grayston. "Many brownfield sites in left behind towns require costly remediation works as a result of contamination, which is often a legacy of these places' industrial histories. Cleaning these sites up so they are safe and ready to make a contribution to the economic, social and environmental life of these places is a crucial foundation stone of levelling up.

"Thinking about transport in particular, I think it's important to understand what we need to do here to actually make use of brownfield sites in Northern regions, particularly in neighbourhoods where there is pretty low housing demand. What we're talking about requires a pretty major shift in the role and funding of Homes England, thinking beyond additionality in determining how to allocate and evaluate funding, and instead the state via Homes England and devolved government becoming a market maker in many left-behind places because you simply don't have the value in land and housing in a lot of left-behind neighbourhoods that would support government to invest in high-quality public transport in these places – let alone in brownfield land remediation. I'd also add that we need to move beyond thinking about the big-ticket transport infrastructure, as important as it is to think about train connectivity between major cities. What's really going to turn things around in a lot of left-behind neighbourhoods where I would describe house and land values as being falsely depressed. These result from low public transport, low-quality public amenity, poor placemaking in the surrounding area, and investing in a place rather than just individual homes and individual streets can overcome those falsely depressed values."

Ruth Cadbury MP, shadow planning minister:

Cadbury highlighted the skills challenges facing local authorities and planning departments generally, and the expertise and the unique skills required for brownfield regeneration. "The RTPI told me this morning that one council has a total of five staff for all planning functions, including local plan, applications and enforcement. So that is a real challenge."

On the statistics in the report, Cadbury noted that between 2006 and 2017 it shows that "brownfield land released for housing development decreased by 38 per cent but the use of greenfield land increased by 148 per cent in the same period. We cannot lose what is a precious resource in the habitable parts of the UK when there is brownfield land waiting to be developed and available to be developed".

"Call me old-fashioned but planning is not just about delivering housing numbers. It's about the all-encompassing, how different parts of land use interrelate with each other. It's national, it's regional, it's local."

Paul Miner, head of land use and planning, CPRE:

"We need stronger planning policies insisting that brownfield sites should be developed before greenfield as a matter of policy. And also to support that we need local councils to

work together so that particular areas of large towns and cities where there is a particular concentration of brownfield land are prioritised for development so that more rural areas aren't expected to come for large increases in housing developments on competing greenfield sites instead. So we need a more strategic county or citywide approach to planning to make sure this brownfield potential comes forward and we're not releasing greenfield unnecessarily."

Miner agreed with Pincher that more support is needed for neighbourhood planning. "In particular, I think neighbourhood plans need more policy backing through the NPPF, so that they can't be undermined by plan speculators and big developers in the way that they can be at the moment. If we've got stronger policy support, I think that'll be a great incentive for communities to get involved more.

"Brownfield sites are particularly valuable in terms of tackling the climate emergency because they are in areas where people have got more choices of how they get around; they can walk and cycle to the shops and other facilities, whereas a lot of greenfield developments we've seen in recent years have often been very car-dependent. And as a result of that trigger increasing levels of pollution in the surrounding area. So a brownfield-first policy has a number of benefits."

[Download 'Recycling our Land: State of Brownfield 2021' from the CPRE website \(pdf\).](#)

Laura Edgar, The Planner
18 November 2021

https://www.planningportal.co.uk/news/article/805/planning_news_-_25_november_2021?utm_source=PPQ+Newsletter&utm_campaign=2f7d6fc48a-Newsletter_11072019_HTML_COPY_01&utm_medium=email&utm_term=0_734e0b63a9-2f7d6fc48a-7261225#four

Appendix 3

Parliamentary Select Committee

On Monday 8th November Michael Gove MP and Secretary of State for Levelling Up was questioned by the [Housing, Communities and Local Government Committee](#).

<https://committees.parliament.uk/oralevidence/2980/pdf/>

https://mcusercontent.com/3036c690a1180c4edb90ae1a0/files/ed1c4fb7-b396-9a4b-9cf2-52ff66c91a52/Select_Committee_08.11.21.pdf

Q78 Matt Vickers: I am sure that planning reform is a hot potato you are delighted to get your hands on. In your letter to the Committee, you said that you were “taking time to speak with key stakeholders, as well as considering the feedback...on the White Paper” on planning before proceeding with any reforms. Who were those key stakeholders? What are the priorities being discussed? What messages are you taking from those discussions?

Michael Gove: The stakeholders include, first and foremost, those in local government, because it is through local government that plans are developed, the community’s voice is heard and decisions are made about the future of places. I am also listening to organisations that have been campaigning, quite rightly, for more homes and for homes in the right places—everyone from Shelter and Crisis to CPRE. They all have an interest in helping to address this problem fairly. I am talking to people in the sector. I have been cautious about engagement with individual developers, but I am talking to people who have a role overall in helping to ensure that we get housing quantity and quality to improve. I have also been talking to people who have been involved in the work undertaken by my predecessor and by James Brokenshire to put beauty at the heart of new developments. My provisional conclusions are reflected in the letter. We want to be in a position where communities accept and welcome new development. What are the reasons why people have resisted that in the past? One is aesthetic: people have thought that the quality of development has not been good and it has been out of sympathy with what is already there. The second is infrastructure: people worry that new development will mean that there will be pressure on GP practices, on their roads and on school places, which they will not secure adequate compensation for. The third is environmental: people fear that new development will contribute to everything from a deterioration in air quality to a loss of green space, a loss of biodiversity and so on. The fourth is the feeling that this is being done “to” rather than “with”—the idea that a combination of top-down numbers and a certain approach from the Planning Inspectorate in line with a certain degree of “Computer says no” operation from the Department means that reasonableness is not taken into account. We want a planning system where people can feel confident that beauty is taken seriously, that the environment is benefiting, that the money will be there to support their infrastructure, and that ultimately the community has a role in determining what is right. What we want to do, and I think what everyone really wants to do, is make sure that in every part of the country there are up-to-date, thoughtful, sensitive plans that have the maximum amount of community buy-in.

Q79 Matt Vickers: How long do you plan to pause the reform process? Is there any chance that it will be abandoned altogether?

Michael Gove: No, we will not be abandoning it. There are some things in it that everyone agrees are sensible. There is no one who has yet said to me, “We mustn’t digitise the planning system.” There is no one who has said, “I’d like to keep it as paper-based and bureaucratic as possible.” As we have just discussed, you cannot look at questions of housing just through the prism of planning. Improving the planning system is one thing, but there are lots of other things that we need to do to achieve our goal of more people in decent homes in the areas that they want to live in, with communities welcoming regeneration.

Q80 Matt Vickers: In their manifesto, the Government committed to building 300,000 homes per year by the mid-2020s, yet MHCLG’s outcome delivery plan makes no mention of the target. Does the target still stand?

Michael Gove: Yes. I think it is going to be stretching, because of all the other factors that we know about—the rise in the cost of materials, pressure on the labour market as a result of covid and so on—but yes. The thing about the outcome delivery plan is that, because it was a new department, I just wanted to make sure that we had an opportunity in the immediate aftermath of the spending review to take a drains-up approach towards it. I am not retreating from the desire to have 300,000 new homes as soon as we can. The key figure, as we have just been discussing, is where and of what tenure. I want to make sure that people recognise that we are not taking the approach of saying, “Let’s hit that target as quickly as possible and devil take the hindmost.” We absolutely want to hit that target, but we also want to take account of beauty, the environment, quality, decency, local democratic control and infrastructure.

Q85 Mary Robinson: Local authorities are also trying to avoid, where possible, building on green belt. They are going for the brownfield-first policy. Yet they are set a target, as they see it, from Government that they think is a Government target. We have heard that it is not really a target from Government and they have to make their own decisions, but when they go to the local inspector they need to know that the inspector is going to look at it from the point of view of guidance that says that there is some leeway in there too. Is there going to be?

Michael Gove: Yes. My colleague Chris Pincher has made it clear that in developing a plan a local authority can say, “Right, this is the number to which we have been working. However, in this community, in this area, you have to take account of the fact that we have AONBs here, SSSIs here, green belt there and so on. It would be unrealistic to expect us, consistently with all those factors, to meet the figure that has been produced.” In making a calculation about housing need overall, I want to look at how the numbers are generated in the first place. Some of the assumptions are probably out of date. Exactly as you say, some of the ways in which those numbers are deployed by the planning inspector can be more sophisticated. I do not want to over-promise at this stage, because I recognise that there is a complex interrelationship between them all.

Q86 Chair: That is helpful. This Committee has been on record over many years in calling for a simplified way of doing local plans, which should be at the heart of our planning system, so that is really welcome. Mary has raised a very interesting point about the numbers. Towards the end of looking at the reform proposals, what I think was called a metropolitan uplift was suddenly announced, where London and then other cities in the midlands and north suddenly got an extra number of homes as their target. In my own case in Sheffield, 40,000 homes over 15 years would have been a real challenge, but the council is basically on the same page as the Government on it. It would mean building on some greenfield sites, but that could just about be done. It was suddenly lifted up to 50,000. That will simply mean building on the green belt. It is going to change the whole dynamics of the process. I just wonder whether you are going to go back and look at this. That number was just plucked out of thin air, it seems to me. Many councils, including in London, are just saying, “We cannot deliver this. It is impossible.”

Michael Gove: Without prejudice to individual cases, let me look again at what the impact has been overall.

Q78 Matt Vickers: I am sure that planning reform is a hot potato you are delighted to get your hands on. In your letter to the Committee, you said that you were “taking time to speak with key stakeholders, as well as considering the feedback...on the White Paper” on planning before proceeding with any reforms. Who were those key stakeholders? What are the priorities being discussed? What messages are you taking from those discussions?

Michael Gove: The stakeholders include, first and foremost, those in local government, because it is through local government that plans are developed, the community’s voice is heard and decisions are made about the future of places. I am also listening to organisations that have been campaigning, quite rightly, for more homes and for homes in the right places—everyone from Shelter and Crisis to CPRE. They all have an interest in helping to address this problem fairly. I am talking to people in the sector. I have been cautious about engagement with individual developers, but I am talking to people who have a role overall in helping to ensure that we get housing quantity and quality to improve. I have also been talking to people who have been involved in the work undertaken by my predecessor and by James

Brokenshire to put beauty at the heart of new developments. My provisional conclusions are reflected in the letter. **We want to be in a position where communities accept and welcome new development.** What are the reasons why people have resisted that in the past? One is aesthetic: people have thought that the quality of development has not been good and it has been out of sympathy with what is already there. The second is infrastructure: people worry that new development will mean that there will be pressure on GP practices, on their roads and on school places, which they will not secure adequate compensation for. The third is environmental: people fear that new development will contribute to everything from a deterioration in air quality to a loss of green space, a loss of biodiversity and so on. The fourth is the feeling that this is being done “to” rather than “with”—the idea that a combination of top-down numbers and a certain approach from the Planning Inspectorate in line with a certain degree of “Computer says no” operation from the Department means that reasonableness is not taken into account. We want a planning system where people can feel confident that beauty is taken seriously, that the environment is benefiting, that the money will be there to support their infrastructure, and that ultimately the community has a role in determining what is right. What we want to do, and I think what everyone really wants to do, is make sure that in every part of the country there are up-to-date, thoughtful, sensitive plans that have the maximum amount of community buy-in.

Q79 Matt Vickers: How long do you plan to pause the reform process? Is there any chance that it will be abandoned altogether?

Michael Gove: **No, we will not be abandoning it. There are some things in it that everyone agrees are sensible.** There is no one who has yet said to me, “We mustn’t digitise the planning system.” There is no one who has said, “I’d like to keep it as paper-based and bureaucratic as possible.” As we have just discussed, you cannot look at questions of housing just through the prism of planning. Improving the planning system is one thing, but there are lots of other things that we need to do to achieve our goal of more people in decent homes in the areas that they want to live in, with communities welcoming regeneration.

Q80 Matt Vickers: In their manifesto, the Government committed to building 300,000 homes per year by the mid-2020s, yet MHCLG’s outcome delivery plan makes no mention of the target. Does the target still stand?

Michael Gove: Yes. I think it is going to be stretching, because of all the other factors that we know about—the rise in the cost of materials, pressure on the labour market as a result of covid and so on—but yes. The thing about the outcome delivery plan is that, because it was a new department, I just wanted to make sure that we had an opportunity in the immediate aftermath of the spending review to take a drains-up approach towards it. I am not retreating from the desire to have 300,000 new homes as soon as we can. The key figure, as we have just been discussing, is where and of what tenure. I want to make sure that people recognise that we are not taking the approach of saying, “Let’s hit that target as quickly as possible and devil take the hindmost.” **We absolutely want to hit that target, but we also want to take account of beauty, the environment, quality, decency, local democratic control and infrastructure.**

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