



29th October 2020

Consultation on Planning White Paper,
Ministry of Housing, Communities and Local Government,
3rd Floor, South East Fry Building,
2 Marsham Street,
LONDON,
SW1P 4DF

Dear Sirs,

Planning White Paper consultation.

Submission by the Land Promoters and Developers' Federation (LPDF)

1. About the LPDF

The Land Promoters and Developers' Federation (LPDF) comprises the UK's leading land promotion and development businesses. We have some 27 members and 51 affiliates who specialise in the promotion and development of particularly strategic land for both housing and commercial development, throughout the country – helping to generate homes and jobs and to move towards delivering the Government's target of building a minimum of 300,000 new homes per year by the mid 2020's.

Following a gradual change in the development market over the last decade, land promoters and developers have adopted a business model which provides a vital service to housebuilders, local communities and the nation by sourcing land, delivering implementable sites and de-risking the process for the house-building industry, to enable housebuilders to excel in what they do best – building high quality new homes underpinned by strong principles of place-making.

Our members promote sites ranging from 20-30 dwellings to schemes of 10,000 new homes or more, both on brownfield and greenfield sites. Having sourced and selected the land from a variety of different landowners, they undertake the patient work of negotiating on the land, and then promoting, servicing, and preparing it to bring forward sites which are 'ready to go' so that homes can be delivered quickly for the housing market. These are sold on to housebuilders, both large and small, providing a full range of sites to meet a variety of needs and demands. The willingness of the LPDF's members to risk their capital on promoting land through the planning system aids the Government's objective of diversifying the base of housebuilders who will ultimately deliver the 300,000 new homes as many would have insufficient financial resources to undertake this task themselves.

2. The need for change?

First, we welcome and wholeheartedly concur with the intent, aspiration and ambition which lies at the heart of the White Paper, to enable the planning system to deliver a minimum of 300,000 new homes per annum by the mid-2020s.

In arriving at the views expressed within this response we have engaged fully with all our members and consulted with many organisations, including the HBF, LGA, RTPI and CIC. All acknowledge the need for change and improvement in the planning process but it would appear that none are wholly convinced that it is beneficial to overhaul the entire planning system. We would agree. The planning process is indeed bureaucratic, time-consuming and often frustrating, but the Federation does not believe that a fundamental change to the planning process will actually achieve the objectives set out in the White Paper – all of which are entirely laudable – especially in the short term.

In our view, a more thorough, immediate review of the operation of the existing system, with changes made through the NPPF and NPPG, minimising the need for primary legislation would yield much greater benefits in the short term. Any major change to the system is likely to lead to a hiatus in the Local Plan making process which will endanger the key role that the sector can play, as currently, in the economic recovery which will need to take place and be sustained post pandemic.

The LPDF remains fully supportive of a Plan-led system, and we therefore consider that the focus should be on ensuring that there are up-to-date Plans that are flexible enough to deliver over 300,000 dwellings per year. The NPPF already pushes for much of this, however the abuse of footnote 37 in order to avoid reviewing Local Plans that are clearly out of date and the ‘gaming’ of the housing need system is undermining many aspirations of national policy.

Our three key messages in terms of improving Plan making, which should be driving the delivery of 300,000 homes a year are:

- Binding housing requirements should be brought in across the country that set a minimum housing requirement necessary to deliver 300,000 dwellings per annum;
- Once 5 years old, unless independently reviewed and found to be up-to date, **all** Local Plan policies should be considered out of date. Statutory designations that are protected by separate legislation such as SSSIs, National Parks or AONBs would still quite rightly be protected; and
- Once Local Plans are Submitted for Examination, Inspectors should be empowered to make the requisite changes to make a Plan sound and the current process of returning unsound Local Plans to LPAs for amendment should be stopped as it is both time consuming and ineffective.

If wholesale change is viewed as necessary, the transition should be a long one to enable the proposals contained within the White Paper to become fully conceived, whilst allowing the immediate review of the existing system to play its part in sustaining and expanding delivery in the short term.

3. Reflecting on the White Paper introduction

The LPDF does not fundamentally disagree with any of the points made within the White Paper under ‘The challenge we face’, though we believe that in a number of respects the points have been over emphasised to justify the need for the scale of reform potentially proposed by the White Paper.

Neither do we disagree with the aims stated under ‘A new vision for England’s planning system’. However, it is arguable that many of these aims can be achieved by focussed changes to the existing system (as highlighted above) rather than the fundamental reform proposed which could see a hiatus in delivery in the parts of the country where need is most acute.

4. In Conclusion

We wish to help the Government deliver on its housing objectives in the most swift and efficient way possible without creating damaging structural changes which could set back progress rather than taking it forward. When our nation is likely to require the housebuilding sector to play a great part in its economic recovery from the pandemic we do not feel that asking either local authorities or industry participants to cope with the impact of fundamental changes is appropriate. Indeed, it would still not address the changes that need to be made immediately to ensure that housebuilding levels are maintained and grow towards the Government's target over the next 5 years.

In conclusion, though we feel there is much to support within the White Paper and we have responded positively to the individual questions in the document within our Appendix to this letter we believe that there remains the requirement for urgent action at present to make the existing system operate more efficiently. We would be happy to continue discussions on the proposed reforms and explore how those recommended proposals could be implemented in the most effective and appropriate manner as well as to discuss the imperative for the immediate reform we highlight.

Yours sincerely

John Acres
LPDF Policy Director.

Sent to: planningforthefuture@communities.gov.uk