**HRA – CHANGES TO THE CURRENT PLANNING SYSTEM**

**HRA RESPONSE TO THE GOVERNMENT CONSULTATION PAPER**

Highfield Residents Association is the largest and most active residents’ association in Southampton with several hundred paid-up members. HRA has given careful consideration to the proposals in the August consultation paper. HRA notes and regrets that the proposals take very little account of the needs or interests of local communities. This is particularly to be regretted because in our view the proposals will do little or nothing to improve the supply of new dwellings by the private sector. This is because the planning system is almost irrelevant to the number of new homes built, the main reason for the shortfall being the weak contribution of local authorities (which in turn reflects continuing Government policies unaffected by these proposals).

Our responses to the specific questions in the consultation paper are as follows.

**Q1** The latest household projections averaged over a 10-year period should be used as the baseline: using 0.5% of the housing stock implies nothing about need.

**Q2** See Q1.

**Q3** No. It is simply illogical to relate the affordability ratio to the number of required dwellings. All past experience suggests that changes in house prices are mainly related to changes in the economy (as is currently being seen).

**Q4** HRA sees no case for this (see answer to Q3).

**Q5** Please refer to Q4.

**Q6** Please refer to Q4

**Q7** Please refer to Q4 and Q6.

**Q8** HRA cannot see why private developers would build affordable homes absent a subsidy from central government. The tenure of the 75% not designated as First Homes should be determined by agreement between the local authority and the developer in accordance with local planning policies.

**Q9** Surely, affordable home ownership is not ‘for build to rent’? Exemptions do not make sense here.

**Q10** The only reasonable exemption would be for small estates of up to 10 dwellings, and even here developers may try to split larger developments into smaller ones.

**Q11** We do not see a need for any other exemptions.

**Q12** We have no comment.

**Q13** In our view, discounted dwellings should remain as discounted dwellings.

**Q14** As indicated above, we view the use of Exceptions sites as a clear breach of the principles of the Localism Act. The huge effort put into Local and Neighbourhood Plans by HRA and many other local community groups should not be put at nought by the principle of ‘Exception Sites’.

**Q15** No.

**Q16** Yes.

**Q17** No.

**Q18** 10 would be an appropriate level for the small sites threshold.

**Q19** No.

**Q20** No.

**Q21** No.

**Q22** Yes.

**Q23** No. If the Government was serious about enabling SME builders to build more affordable homes it would take such provision out of the conventional housing market and free up some of its own land for new homes for rent.

**Q24** Yes. A Permission in Principle application should be allowed for a wider range of sites thus increasing the velocity of housing development. However HRA is concerned that the Government may be considering reducing still further the information and publicity requirements for planning applications. This would be a retrograde step that would weaken both local democracy and the efficacy of the planning process itself.

**Q25** HRA has no comment.

**Q26** Yes.

**Q27** Yes: the height of any building over three storeys should be listed.

**Q28** HRA would favour (i) and (ii).

**Q29** HRA has no comment.

**Q30** HRA has no comment.

**Q31** Yes.

**Q32** HRA considers that the existing Guidance is adequate.

**Q33** Please refer to Q32.

**Q34** Please refer to Q32.

**Q35** HRA is content with the continuance of the Public Sector Equality Duty as it is.

HRA 28th September 2020