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Please accept the House Builders Association (HBA), the housing arm of the National Federation of Builders (NFB), response to the 'Levelling-up and Regeneration Bill: reforms to national planning policy' consultation.

Q.1: Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) for as long as the housing requirement set out in its strategic policies is less than 5 years old?

No

The 5YHLS and Housing Delivery Test are excellent tools to ensure accountability and therefore must be retained. They also focus over a three year period, which highlights the robustness of any plan. More importantly and often overlooked, the two together increased the opportunities for small and medium sized housebuilders (SMEs), who could be relied upon to deliver sites more quickly due to their business model of building out quickly, on smaller non-phased plots and brownfield. This ensures housing need is met in a timeframe which does not increase pent up demand and consequently helps to support local productivity.

Q.2: Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

No.

The Housing Delivery Test, though lacking teeth, was vital to ensuring that latent demand did not spiral out of control. The lack of teeth did harm some places, for example, Eastbourne has delivered just 36% of housing need without consequence, but the buffers and presumption are sticks, which only come into play after many carrots of new development have been exhausted, or most often, rejected.

40% of London and South East LPAs and a third of LPAs are not meeting their minimum housing targets, and this would be worse without long term penalties for failure. The Government must therefore recognise that the reason it is able to champion its increased housing delivery narrative as better than Labour's 2007 high, is precisely because of the Housing Delivery Test and 5YHLS, and not local plans as it is now turning to for the solution.

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Q.3: Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on, or is there an alternative approach that is preferable?

The Housing Delivery Test's assessment of the 5YHLS measures the minimum number of homes required and therefore oversupply should not be considered a 'penalty' to targets. The Government should take an alternative approach entirely, retain the existing structures but implementing a change to how housing need is calculated to ensure enough of the correct homes come forward; for example, for older people (independent, semi support, residential care), transition housing (moving out of family homes/in rented before purchasing), single parents who share custody but need extra rooms, employer needs, rough sleepers, homelessness etc. It should do this while also increasing the number of homes coming forward to meet future housing needs, such as future investment coming forward in light of Levelling Up.

England has some of the fewest vacant homes in the OECD and some of the highest prices and costs associated with housing, both for the private and public purse. Oversupply is important because housing demand can change almost overnight but homes, as exemplified by many reports but well-illustrated by Lichfields 'Start to Finish', can take years to get from conception to planning, let alone completion.

Q.4: What should any planning guidance dealing with oversupply and undersupply say?

Oversupply should not be considered as something which needs guidance, unless it is to note that oversupply is the homes that are needed in the future and therefore not part of calculations for 5YHLS.

Planning guidance for undersupply should be clear that any failure to deliver the minimum housing demand will result in a regional body assisting the failing Local Planning Authority to identify and meet its need, including the retention of planning powers; as was the case pre 1947 in the 1919 Housing Act when Britain was serious about tackling its housing crisis.

Q.5: Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

We believe that until the Government has a firm plan for plan making and a settled understanding of how local and neighbourhood plans work together, no changes are required.

We would also challenge the understanding of 'speculative development' because in technical terms, only windfall is speculative, as others are all planned for.

As Lichfields, 'Local Choices?' paper identified, only 40% of made Neighbourhood Plans contained a housing target and/or made allocations. This means 60% or more are likely to experience 'speculative development' and as most of these sites are smaller, delivered by local builders meeting local need.

The term 'speculative development' does not fit. Local bodies are not the only ones to understand and judge local housing and development needs, therefore removing the intrinsic benefits offered by local developers to deliver local housing by assuming it is speculative, is flawed.

A duty for Neighbourhood Plans to analyse the fullness of need and future opportunities linked to, e.g.- employment, should be the minimum expectation, particularly as it could inform the wider development requirements set out in local development plans.

Q.6: Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

We absolutely believe the opening chapters should be clearer about the importance of planning for homes and other development our communities need, but as read, we believe the Government has introduced enough ambiguity to ensure LPAs do not meet these expectations and interpret the NPPF as they choose.

We list alterations below, in CAPITALS or strikethrough.

2.7

'It provides a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner.'

'It provides a framework within which locally-prepared plans ~~can~~ **MUST** provide for ~~sufficient~~ housing and other development in a sustainable **STRATEGIC** manner **MEETING ASSESSED LATENT AND FUTURE NEED.**'

2.8

b) a social objective – to support strong, vibrant and healthy communities **AND BUSINESSES,**

Explanation - This is necessary to ensure locally employing businesses are key to any development plan. In construction alone, CITB data show that SMEs train 7 in 10 construction apprentices and are 90% of training capacity. Our data shows that our members typically employ within 20 miles of their head offices.

2. 11

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.; ~~such adverse impacts may include situations where meeting need in full would mean building at densities significantly out of character with the existing area8 ; or~~

Explanation - An area's character changes as the area changes, therefore without defining what 'significant' means, we believe this should be removed. Local policies can already identify the density requirement of sites, therefore we do not believe the extra wording now attached does anything but hinder development, particularly as the bill protects landscapes; a total overreach for rural communities, farming (which is defined as industry) and growing towns.

~~iii. there is clear evidence of past over-delivery, in terms of the number of homes permitted compared to the housing requirement in the existing plan,; in which case this over-delivery may~~

Explanation - As noted in previous answers, over-delivery should not be viewed as negative, and reference to it in this section should be removed.

2. 14

Should be returned to its previous writing.

3. 15

‘ADDRESSING AND meeting housing needs’

The Government should also make mention of Local Development Orders (LDO) as strategies to deliver above and beyond the existing building regulations and planning policies, so they operate as carrots to delivery. One example might be on Part L. This ensures streamlined planning for X local ambition but statutory planning processes are not removed. We believe this is key in dealing with the creep of climate related localism, which is not based in any commercial thinking but instead, to show councils are ‘doing something’. It also goes against Building Regulations but despite our requests, no Ministerial Statement has been announced to stop councils implementing it, as has occurred in Bath and North East Somerset.

Q.7: What are your views on the implications these changes may have on plan-making and housing supply?

The Government has introduced extra ambiguity to a document which is already treated by LPAs as malleable and therefore we can only see the trajectory of housing supply decreased and SME builders leaving the sector, which is already happening due to planning delays and costs.

Plan making will continue to not build the right homes in the right places, under-deliver and party politics under the guise of localism will not increase productivity or deliver the outcomes local people need now or in the future.

The lack of explicit need for housing, employment, amenities and why that matters in the context of coherent present and future placemaking is highly detrimental, as is the lack of land use strategies. Planning is broken but without land use and strong spatial planning approaches, delivery, certainty, ambition and outcome is curtailed.

Construction contributes £110 billion per annum and is 7% of GDP. The loss of housebuilding isn’t simply the loss of housebuilders but the hundreds of thousands of construction related jobs that ensure commercial and capital projects are completed. It took more than a decade to regain the 337,000 people that left the sector after the 2007/2008 financial crash and with two thirds of industry without pensions and 500,000 expected to retire in the next decade, the UK cannot afford early workforce retirees, which is already a trend. In turn, this will make housebuilding even more challenging as the workforce drops again.

We are very concerned that the Government does not realise the impact of their decisions on planning reform and would highlight this with the lack of support SMEs have had in practical planning terms, despite them training 7 in 10 construction apprentices, making up 90% of training capacity and typically employing with 20 miles of their head offices. Without work pipelines, new construction workers will not be trained and ultimately, retained.

Q.8: Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

No, the Government must retain the standard methodology until it has a more coherent approach to delivering latent, existing and future housing need. The standard methodology identifies a minimum need, therefore exceptional circumstance, such as homes for older people, should be a strategic extra offered to define total or specific need. Any deviation from this risks greater ambiguity in development needs.

We should be identifying the need in the context of the 300,000 ambition, rather than exploring how to reshape the number under 'exceptional circumstances'.

Q.9: Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out-of-character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

No.

The Green Belt has become a party political tool, not a strategic barrier to urban sprawl. The Government appears to want 15 minute cities/20 minute neighbourhoods but all those nations delivering them do so within one hour regions, see Randstad in Netherlands. By affording extra protections to Green Belt, we not only harm the 15 minute city concept by reducing the working populations and opportunities within areas, especially rurally, but ensure that a regions strategy is curtailed. This is levelling down, well exemplified in the South East, where agriculture revenues have halved in the last decade due to land use and worker housing issues. This levelling down is also experienced in green technology companies who are struggling to grow as they are unable to retain and attract staff because of housing costs.

This problem also plays into the character of an area. Areas change, think Milton Keynes or central London, therefore we should be stimulating opportunity for new towns, extensions, strategic expansion and employment but this is impossible without use of green sites. We are particularly concerned with the Government's consideration of gentle density in cities such as London, where 'Community Density' is preferable.

Where brownfield or densification is sensible, it is welcomed but often, it uses up land for non-housing. This is a major concern when you then increase populations by building housing on them, as you now need to provide non-housing land, which inevitably will need to be on the greenfield sites away from communities; thus breaking the 15minute city concept and increasing car dependence.

We have dealt with oversupply several times. According to the OECD, the UK has some of the fewest vacant homes and highest demand, therefore oversupply should be erased from the Government's thinking. The 'Centre for Cities 4 million missing homes research highlights this by exemplifying how and why we have a shortfall of four million homes.

Q.10: Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out-of-character with the existing area?

This strategy should form part of assessed local housing need and offered through an LDO. For example, if an assessed housing need requires independent older person housing, three bed homes for single parents, social housing transition housing of smaller one bed properties, etc, then an LDO granting permission if X criteria is met, should be offered. If a different scheme is planned, it should go through the standard planning application process.

This would permit LPA's to target specific local need and do so via 'Community Density'. The building design should also take into consideration the impact on the community, for example, it may need extra MUGA pitches, which could be provided on the roof. Car parking via underground spaces. Mixed use facilities for varied businesses. This would ensure community dense building targets local needs and does not simply operate as a block of flats meeting housing supply. For councillors, this would also provide the cover to support a development because they set the criteria for it based on the communities need.

We should not be afraid of very dense buildings and development, provided they are designed well, but if we do not offer streamlined planning and instead go through the standard planning process to achieve targeted needs, the broken planning process will make site viability very difficult. LDO's are a vital element of this strategy, as along with design codes, reduce the time taken for planning, therefore also reducing inflationary costs, while ensuring pipeline certainty for employment.

The use of community density in this manner also operates strategically when a non-housing site is lost or compromised, as it could replace its use within the structure.

It must also be appreciated that density could be terraced buildings, or a dense site within an area that has a minimum plot footage due to historical landowner caveats, such as in Calthorpe Estates in Edgbaston, Birmingham.

Q.11: Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?

No.

Local plans should be a rigorous examination of an area's need. Justification is a core principle in ensuring clarity and direction for all who engage with it, from local people and businesses to housebuilders and future investors.

Q.12: Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

Yes, because we are concerned that revisions are not the correct direction and therefore welcome the ability to compare the Government's new direction with the one which is in place but also struggling.

Q.13: Do you agree that we should make a change to the Framework on the application of the urban uplift?

We welcome the uplift but not the reasoning. Exporting supply to surrounding areas is a sound way to deliver fifteen-minute cities and support regional growth. Using up brownfield land within existing cities in a way which only delivers primarily residential density that a politically expedient design guide welcomes, is not.

Denser cities are excellently placed to deliver the homes desperately needed but they will likely not be delivered in the density required, which means the type of homes delivered will kick the supply crisis down the road. We see this most prominently in London, where gentle density is being championed as a solution to a city which is already failing because it's gently dense. In smaller cities and towns, it has a greater impact but as the Government is focusing on the 20 largest cities, we believe that a new issue of flawed land use is being created.

As an example: Dudley is in the top twenty largest cities in England so would be expected to deliver the uplift. With a strong industrial heritage it is also expected to support Birmingham and the West Midlands commercial needs but with brownfield land lost to residential, competing regions will suck up the investment as would rural communities surrounding it, where many engineering firms exist. But now, due to Dudley delivering residential uplift and losing non-housing land, the rural communities and surrounding cities who are now not expected to grow their housing stock would have Dudley residents driving to them and Dudley would have a considerable reduction of non-housing land to meet resident needs.

This also does not help Birmingham, which has been losing industrial sites to residential for several decades and therefore with improved public transport to Dudley, has become increasingly reliant on neighbouring places for brownfield sites for investment opportunities.

The Government should therefore encourage the uplift but on a regional basis, either via county or Mayoral powers, so that a strategy to grow the region exists but not function to overwhelm a city with residential housing built on strategic non-housing allocated land. This should be part of a spatial planning strategy under a Regional or Devolved Development Management Plans, in part informed by the NDMP.

Q.14: What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

Strong spatial planning is required, and uplifts should be on a regional basis, either County or in Mayoral regions, so it incorporates a strategy to grow the region but not overwhelm a city with residential housing built on non-housing allocated land, thus removing its natural land use assets.

HomesEngland should also play a key part and they should be given planning powers to achieve strategic aims, or control of failing LPAs who are not delivering housing demand.

Q.15: How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

If the Government is serious about productivity, it must reinforce Spatial Planning principles and reintroduce spatial planning powers via Counties or through Mayors. The Duty to Cooperate failed because it isn't really a duty but instead, a bureaucratic acceptance. Land use remains a key component of any uplift or economic growth but with LPAs hamstrung by party politics, growth is not the primary ambition.

In 1975, Frederick Willey MP, Sunderland North said "In the context of housing, it will be unfortunate if something which I believe every sensible person recognises must be done—namely, bringing the right land forward—is prejudiced by local party politics." Almost fifty years on, nothing has changed. In fact, it has got worse as land use opposition also includes employment, services and amenities as well as housing.

Q.16: Do you agree with the proposed 4-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

No. The Government should take stock of the landscape which has unravelled since its planning reform announcements, where more than 40 local authorities have stalled local plan submissions. They see the Government as reducing the burden on them to meet minimum housing need and are acting accordingly.

They see what industry sees, that the Government does not want to build enough homes for the existing population, let alone enough for future housing and placemaking needs.

Q.17: Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

No.

The key to the Government's thinking is in the detail for the question, 'reduced housing land supply requirement' and referencing 'speculative development'. As previously mentioned, speculative development is often the right homes in the right places, coming about because a failed 5YHLS permits SMEs to put forward smaller sites.

Q.18: Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

No.

At every turn, the Government appears to be trying to reduce new housing supply and the expectation for LPAs to meet it and as previously mentioned. The penalties included in the HDT ensure that SMEs sit ready to meet a robust land supply, therefore without the penalties there is little onus to allocate sites which can be delivered more quickly. This will return us back to the delivery experienced pre-HDT, where undeliverable sites with high numbers are allocated, rather than the deliverable ones which the Government champions as its ‘successful time in office’.

The number focused allocation will also harm SMEs, who currently deliver the quickest to deliver sites and although rarely mentioned, were at the heart of lobbying for the HDT to ensure they could compete for allocations; even if it was to meet need after an LPA’s initial assessment didn’t deliver. This occurred because LPAs too often allocated sites were assessed without full planning, without any planning and without understanding what needs to be put in place and the timeframes, e.g.-services, before work or building can even begin.

This is again why Regional or Devolved Development Management Plans may be vital, as they can ensure the infrastructure element of an application that LPAs do not control, is put in pace, or the timeframe to deliver it understood,

Q.19: Do you consider that the 115% ‘switch-off’ figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

Permissioned housing is not delivered housing and ‘permissioned’ does not mean full permission and clearance where shovels can immediately go into the ground.

We therefore cannot support this anti-delivery proposal, which again, does little to support SME housebuilder pipelines but instead, treats their local need motivated applications as speculative and gives greater support to major developers sites (the proposal also curtails major builders delivery) while also kicking the supply can down the road.

Q.20: Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

The only way to count deliverable permissioned homes are those with full planning permission and pre-commencement conditions, along with highways and services, satisfied.

Q. 21: What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

The 2022 test should be published and consequences applied as usual, particularly as we expect reforms to reduce supply. We must therefore do all we can to deliver the homes that the HDT safeguarded we delivered and the Government forms as the basis for its housing supply successes.

Q.22: Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

No.

Attaching 'more weight' infers that if you deliver social rent, you'll be put to the front of the queue. This further trivialises the NPPF's attempt at 'Rules Based Planning' and ignores the land buying process. This is particularly true when permissions are not submitted by the builder who must make a site viable a long way down the line due to a broken planning process, and very pertinent if just an outline planning.

As mentioned earlier, if we want to 'attach weight', the LDO regulation should be implemented; for example, if you meet X social homes, you will go through a streamlined planning process.

We note the Government is proposing to retain Section 106 for strategic sites, or as we believe it will be implemented, 'Section 106 for large sites and big builders'. All other sites (builders) will pay the standard levy. This adds further weight to a need for rules based planning via LDOs, rather than adding weight to housing supply that local authorities/charities should be delivering or simply purchasing from builders now their HRA cap has been lifted.

Adding 'more weight' appears to a 'fudge' because the Government intends not to build enough homes, or use land, and sees market homes as a good place to convert much needed market supply into politically expedient social supply. Due to the cost of development, aided by the 13 new taxes and regulatory costs imposed over the last few years, this will just result in projects never starting.

The regulatory costs implemented in the past two years are as follows:

1. Schedule 3 of the Water Act
2. Red diesel rebate removal
3. Nutrient neutrality
4. BNG onsite
5. BNG offsite
6. Part S
7. Part L
8. Part O
9. Part S offsite, demanded by DNOs
10. Part F
11. Residential Property Developers Tax

12. New Homes Ombudsman, whose sliding scale charges SMEs more than majors and micro builders
13. Building Safety Levy

Q.23: Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

Yes, although we do not believe that the Government is going about it the correct way as many other needs are not appreciated, such as persons living at home but wanting to move out, house shares or rough sleepers. All LPAs should use digital technology, perhaps attached to council tax numbers, to do coherent assessments of what need is required and then implement that alongside the housing targets or go above it. As previously identified, it could do this with LDO's.

The Government has many challenges to solve, e.g.-childcare costs or finding employment, therefore it must consider how people can be supported and how valuable remaining in one's community can be to achieve that. This can only be done with supply above the existing targets and land allocated to enable a growing community ambition.

Q.24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

As original proposers of this policy, we were disappointed that our recommendations were watered down when first consulted on and hope a new ambition to support SMEs now exists.

- 10% is too low. The Government proposed 20%, we suggested 30%, to meet current SME delivery.
- There is no requirement to meet that very low percentage.
- We welcomed the addition of the word 'medium' to site sizes but were disappointed that no number was attached, as 'small' follows on from the 'Minor' site definition. We therefore again recommend that we need a 'Medium' sized site of forty (40) homes. We settled on 40 as many majors are now delivering sites of 50 and we wanted to support as many true SMEs as possible.
- Currently, for neighbourhood plans, small and medium is read as - specific, deliverable sites for years one to five of the plan period. This needs amending to register small and medium sized sites as 'Up to forty homes'. This is consistent with several government policies and our BNG proposals to extend the use of the Small Sites Metric, while adding on site, such as fabric and site design, solutions to the calculator.

Supporting SMEs is problematic under the Government's housing and planning definitions because it views small builders as delivering up to 100 homes and medium sized builders as up to 2,000. This does not marry with the site size definitions and outcomes, which sees a site of 11 treated the same as a site of 101 or 1,001 and it certainly doesn't help micro builders turn into small builders, and small builders turn into medium sized ones.

We would therefore recommend -

- A small and medium sized site register - This is vital for delivering on smaller sites (it does not have to operate formally) and would assist LPAs who worry about the administrative costs. This would also help opportunities be brought forward and be judged strategically, for example, garden or garage sites.
- Strategy in site allocation is vital as currently, LPAs do not view sites of between ten and forty as strategic, despite them being most likely to deliver quickly, often on brownfield sites and within existing communities, so helping with the 15 minute city concept.
- Smaller sites in rural locations have also not benefited from the NPPF reforms, despite them being excellent opportunities to build out communities sensibly and create time to plan urban extensions or new towns. Again, losing the HDT and its penalties will ensure smaller sites move further down the pecking order and therefore treated as even less strategic and more speculative, which of course the NPPF, through the term 'windfall' in Para 70, says it wants to support.
- LDO's are not used, despite the HBA's attempts to help LPAs understand them. Quite often, a lack of resources is cited as the reason for not implementing them; however, we have also found that we needed to explain what they are and how they could be used. The Government should emphasise their worth and how they could be used.
- The subdivision policy is another HBA recommendation which we were delighted was picked up. However, we recognise that without land assembly powers, or ambition, it will sit as a mostly unused policy. We have therefore been advocating clearer and simpler CPO processes, or greater powers created, so that councils can use it to provide a more competitive and strategic housing market, which is diverse and supports all sorts of tenures and builders, e.g. -self build or CLTs.

Q.25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

As previously mentioned, LDOs should be used for affordable housing. The government may also like to extend the definition of afford to Custom Build, which would permit builders to customise homes for buyers..

- 10% of sites being small and medium sized is too low to assist diverse supply and support SMEs, plus the definition would benefit from be on 'number of houses', not 'up to one hectare'. Our recommendation is sites of between ten and forty homes delivering twenty percent of allocations (medium sized) and ten percent delivering fewer than 10 (small/minor in planning terms).
- We welcomed the addition of the word 'medium' to site sizes but were disappointed that no number was attached. As 'small' follows the 'Minor' planning definition, we recommend a 'Medium' sized site definition of forty (40) homes. We settled on 40 as some majors are now delivering sites of 50 and we wanted to support as many true SMEs as possible. We would however be comfortable with 50, particularly as it mirrors the charging schedule of planning applications.

- In paragraph 71 in relation to Neighbourhood Plans, small and medium is currently read as - 'specific, deliverable sites for years one to five of the plan period'. This needs amending to register small and medium sized sites as 'Up to forty homes'. This is consistent with several government policy proposals and also our BNG proposals to extend the use of the Small Sites Metric, while adding on-site solutions, such as fabric and site design.
- Supporting SMEs is problematic under the Government's definitions and understanding because it views small builders as delivering up to 100 homes and medium sized builders as up to 2,000. This does not marry well with the site size definitions, which sees a site of 11 or more homes treated the same as a site of 101 or 1,001, and it does not help micro builders turn into small builders, and small builders turn into medium sized ones. A definition change in planning terms, as exemplified in the previous point, would be helpful to not only better help understand the SME market but create opportunities for targeted policies to assist them.
- A small and medium sized site register is vital for delivering smaller sites and despite the Government not implementing it following their previous consultation, some LPA's have implemented their own. Such a register would also help bring forward opportunities that are not typically views as strategic; for example, garden or garage sites.

Strategy in site allocation is vital as currently, LPAs do not view sites of between ten and forty as strategic for their supply requirements, despite those site sizes being most likely to deliver quickly, often on brownfield and within existing communities, so helping with the 15 minute city concept.

Smaller sites in rural locations have also not benefited from the NPPF reforms, despite them being excellent opportunities to build out communities sensibly and create time to plan urban extensions or new towns. Again, losing the HDT and its penalties will ensure smaller sites move further down the pecking order and therefore treated as even less strategic and more speculative - windfall is deemed speculative, as it is not 'allocated' - despite the NPPF, through the term 'windfall' in Para 70, citing a desire to support.

LDO's are not used on housing, despite the HBA's attempts to help LPAs understand them. Quite often, a lack of resources is cited as the reason for non-implementation; however, we have also found that we needed to explain what they are and how they could be used. The Government should emphasise their worth and how they could be used.

Subdivision of large sites was a key HBA recommendation which we were delighted was picked up. However, we recognise that without land assembly powers, or ambition, it will sit as a mostly unused opportunity. We have therefore been advocating clearer and simpler CPO processes, or greater powers created, so that councils can use it to provide a more competitive and strategic housing market, which is diverse and supports all sorts of tenures and builders, e.g.-affordable, self-build or CLTs.

Q.26: Should the definition of “affordable housing for rent” in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

Yes. More competition for affordable houses for rent is required and this would help increase the small number of RPs who councils favour to take on these affordables. We do not oppose the Governments suggestion that ‘for profit’ providers can be involvement and have previously suggested it.

There is also a real concern within industry as to how RPs who take these homes benefit, as on shared ownership they purchase a home at a discount, sell the home at market price, borrow against their share and charge homebuyers rent as they staircase out. This is incredibly unfair on the development industry, who is effectively subsidising businesses, not housing.

With Right to Buy on RP homes likely, we must permit competition as to who can take affordable homes, so that development cost is paid for, rather than simply subsidised by an already squeezed development industry. We would like to note that Persimmons profits are not the typical profits made by industry and ‘Persimmon Syndrome’ should not drive policy strategy or understanding of the sector as this approach is harming SMEs the most.

Q.27: Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

We refer to previous comments on LDOs, such as how they could be used to meet X local need.

Q.28: Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

HomesEngland could play a far greater role in financing these sites.

Q.29: Is there anything else national planning policy could do to support community-led developments?

Strengthen or simplify CPO powers and advance the use of subdivision of large sites so that councils can arrange land. A minimum percentage of sites being for community led, self or custom build projects (custom build should also count as customised market housing) would be welcomed and to understand this demand and what percentage may suit, all LPAs should have to publish the number that have joined their Self Build Registers.

Q.30: Do you agree in principle that an applicant’s past behaviour should be taken into account into decision making? If yes, what past behaviour should be in scope?

Absolutely not. The result of constant attacks on the sector have seen SME developers being tarred unfairly and the Government choosing to tax them to rectify other’s mistakes. We also have the ‘building beautiful’ concept, which has taken no consideration for those already building ‘beautiful’. This is a clear

indication that the only past behaviour considered will be anything negative in the eyes of whomever is deciding what 'bad behaviour' is.

A good example is a member in South Yorkshire who built leasehold houses, due to a longstanding history of the area's land arrangements and non-adoption of roads. Unlike others involved in selling freeholds, his companies freehold were available for a set price in perpetuity (£2,750) and ground rent for leaseholders went up by £100 every decade, not doubling. However, he was criticised by local councillors in a neighbouring ward who deemed him a 'bad actor' and the builder believed he had extra, unfair scrutiny on his developments as a cause of that.

At every turn this question poses problems. The Government has permitted the '1million unbuilt permissions' lie to be used unchallenged, which has crafted a false narrative which plays into the question asked into the consultation about what is 'bad behaviour.' Not only is the '1 million' figure flawed in numbers, e.g.-double counting, but most permissions are not full permissions and therefore if delays occur due to pre-commencement issues, or viability issues making sites unviable. This false narrative will then ensure a developer will be punished not because the system is broken but because someone can attribute planning delay to a developers intention and deem it 'bad behaviour'.

Another example is the use of Completion Notices. Many members are given these and on appeal, have them withdrawn. This is deemed as 'breaking the rules' and may influence future decisions or craft a 'bad behaviour' narrative.

There is also the question of legal costs to fight false bad behaviour accusations, or legal challenges so that councils meet the rules based system treated as 'bad behaviour'. The Government may not publish the costs incurred from appeal decisions but creating a new legal appeal system to prove you are not guilty and all because the local community who does not have to spend years meeting ever changing planning rules feels 'bad behaviour' has occurred. We are on the verge of driving 'feeling' into how material considerations function.

The Government should return to focussing on delivering a rules based system which removes ambiguity and delivers clarity. We are astounded that the Government felt this question was applicable to ask the most regulated industry in the UK. The term coming most often from member is 'anti-business'.

Q.31: Of the 2 options above, what would be the most effective mechanism? Are there any alternative mechanisms?

Neither option is effective. They are both overreach based on optics, not reality.

The only mechanism is a rules based system which is adhered to, and which local authorities must also adhere to. Ambiguity and underfunding has and continues to create unviable sites and is supported by a lack of ambition and robustness on site allocations. The Government should invest in planning and put forward serious planning proposals if it truly wants to solve the many concerns it has with housing.

Planning is a growth enabler and used to be viewed that way. We are now asking housebuilders and constructors to fund the enablement of policies that disable their investment.

The only mechanism which is fair from immediate implementation is how public funding for procurement is allocated. Despite saying it would, the Government has made no effective effort to ensure those who, for example, sold leasehold houses, were unable to access public funding. If it cares to punish bad actors, it should use the public purse rather than enable party political gamesmanship.

Q.32 Do you agree that the 3 build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

No.

The Government starts the process with an individually chargeable planning condition via a DCN and then moves into completion notices, which many of our members waste time appealing because local authorities serve them as a revenue strategy, not to ensure homes are completed in time.

After engaging with a planning system riddled with bureaucratic processes, the Government is now proposing a reporting layer as well as an increase in fees which has so far proven not to increase the speed of planning decisions. The HBA supported the previous fee increases (20%) but no member has reported an improvement of process and speed of sign off, therefore we cannot fathom what a fourteenth cost on the industry in the space of two years will achieve, apart from drive down supply and housebuilders from the industry. Something which in the last twelve months has become part of the Government's legacy.

The HBA survey placed 'Planning' and 'Access to Land' as the two main challenges to housebuilding, with every respondent choosing on or the other as they top issue. Developers do not need incentivisation by punishment, they need a planning system which operates fairly and with clarity. Again, a rules based system, one which Planning Committees cannot frustrate.

As an example of this, a member in Cornwall has outline permission for the world first net zero village, which supports a University known for net zero courses. It was supported in the local plan but the 2018 reserved matters application continues to drag, due to parish council frustration. An increase in fees will not help this members project be delivered and the time wasted has now seen material prices increase by almost 50% on some components. Under a rules based system, the project would be delivered and the case for higher fees would not be controversial. This issue is repeated in every LPA.

'Expecting local authorities to do their bit in promptly processing planning permissions and discharging conditions', as the Government puts it, reads as, 'we will not place any measures in place to ensure that planning departments deliver the service builders deserve'. This follows on neatly from the aforementioned 20% fee increase which has not improved the planning process, particularly for SMEs. Any consultation for fee increases MUST come with accountability for failing LPAs and an OFSTED of planning departments. This has not been included in the released consultation and neither has the revenue stimulating costs and delays caused by individually chargeable planning conditions.

Every respondent in the HBA Housebuilder Survey 2022 said there were too many unnecessary pre-commencement conditions and 90% wanted them reformed.

This section discusses the Government's three proposals to 'incentivise build out' - which Oliver Letwins review identifies is not a concern -

We will publish data on developers of sites over a certain size in cases where they fail to build out according to their commitments.

Without any firm details we cannot explain which sized builder this impacts or penalises but whatever the size, a creep into smaller sized sites is a given, therefore should not be pursued.

Developers will be required to explain how they propose to increase the diversity of housing tenures to maximise a development scheme's absorption rate (which is the rate at which homes are sold or occupied).

It is not the developers job to explain how they will increase the diversity of housing tenure. It is the Government's job to enable diversity of tenure through land use policies that enable varied tenure to come forward. Site viability is complex enough with government taxation, regulatory changes and a broken planning process which offers no timeframe certainty. We therefore do not understand how this proposal achieves anything but adding a costly reporting tool, which due to the proposed removal of Section 106 cannot be offset. If the Government has concerns about absorption rate, it should purchase homes itself and begin reducing the £23.4billion housing benefit bill.

The National Planning Policy Framework will highlight that delivery can be a material consideration in planning applications. This could mean that applications with trajectories that propose a slow delivery rate may be refused in certain circumstances.

This proposal is perverse because it will be LPAs and committees made up of people who do not build houses, who decide what meets an acceptable delivery rate. Developers who do build homes, will be asked to submit a timeframe, which may encourage them to meet political expectations, rather than be deliverable. This self penalty will creep into the sector as developers worry that they will not get permission. In the round, developers are not delaying homes being built. Why is the Government seeking to punish all developers, for the actions of a tiny minority?

The Government also hasn't explained how landowners and promoters who submit applications and will set the time-frame expectations, will interact with builders who deliver the projects.

Combined with penalties, we see this proposal as rife for abuse by local authorities, particularly when they have an expectation created by a builder delivering a very different project or because they have seen X project deliver in X time and therefore assume this is the norm. We already see this with viability, as submitted RICS costs are often argued by planners and councillors without considering economies of scale or quality.

Q.33: Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

No.

We have explained to the Government on multiple occasions that you cannot prescribe beauty and that it has ignored the variety of homes that SMEs deliver and are deemed 'beautiful' already.

While some of its proposals are well meaning, such as tree lined streets and reducing car dependence through cycle lanes, they do not appreciate the reality of delivery itself and a developer expected to deliver such approaches ends up between utility providers demanding X and planning policy demanding Y. Rather than creating gordian's knot to appease critics, the Government should be spending time understanding what the barriers to beauty are, while simultaneously recognising the beauty that has/is already been delivered.

Beauty is also not straightforward and prescribing it can be complex, particularly as dismissal and opposition to variety can be quite fierce, as exposed during criticism of Graven Hill's self build scheme; where owners built homes they thought were beautiful.

Q.34: Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places' to further encourage well-designed and beautiful development?

No. As explained above, beauty cannot be prescribed fairly and individual sentiment judging beauty is flawed, particularly when meeting the gordian's knot explained above. Experienced planners are employed to make these sorts of decisions, so while a Design Code or pre-app meeting can offer desired outcomes, ambiguous policy language cannot and will create perverse complexities.

Q.35: Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

No.

The Government is again trying to define what is beautiful and this is not achieved through conditions but through pre-application meetings and trust. It is also going at this through individual chargeable planning conditions and the likely use of further monitoring fees. LPAs already have the powers and funding to monitor, this should be the port of call the Government should be exploring, rather than the introduction of another revenue stream and industry cost.

Q.36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing Framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

The HBA has long supported Mansard Roofs and believes this would be a welcome addition to a roof type that LPAs have not taken advantage of. However, we believe that they will be hindered by local

design policies and standards and we would therefore add weight to their use as a permitted development process, if they create space for family housing and energy efficiency of a home.

The HBA cautions on the continual obsession with 'Gentle Density'. It may be a politically expedient phrase but in our densest cities it ultimately means kicking the supply can down the road. This will be the legacy of the Government if it retains this approach. The HBA welcomes Gentle Density in the correct places but believes 'Community Density' as explained in our answer to Question 10 is the correct approach, and permits very dense and tall developments to be integral and integrated into 15 minute city concepts.

Q.37 How do you think national policy on small scale nature interventions could be strengthened? For example in relation to the use of artificial grass by developers in new development?

The Government has so far missed an opportunity to 'build in biodiversity' and extend nature recovery strategies. Seeing gardens and on-site solutions included in the recent BNG consultation was welcomed but the HBA recommends the following strategies –

- Extend the small sites metric to 40 homes
- Specify on-site BNG solutions that contribute to the 10%+ calculation. Such onsite solutions could be fabric (e.g.-swift bricks) and site design (e.g.-lifting hedges)
- Tie the on-site solutions to local species, so that developments are part of wildlife corridors.

The HBA believes that the above solutions are absolutely necessary to ensure SMEs are not harmed by Biodiversity Net Gain regulation, which is pushing for offsite taxes, not onsite solutions. So far, members have reported the expectation of a £1m contribution on 250 homes and £42,000 on a site of 17, which shares a boundary with a site of 20 homes which scores so poorly (or well, depending on your point of view), that zero offsetting contributions are required.

The HBA spoke at the committee investigation of the Environment Bill and identified the possible implications of this policy, which we have supported since 2016. We did not ask for exemption because we believed our solutions would work; however, our solutions have not been implemented and this policy will serve to harm supply and opportunities for SME builders.

Since being the driving industry force for BNG, members have changed their mind when they see the penalties it will have on SMEs and many are now asking for exemptions, or standardised BNG solutions that are not part of the metric on sites of up to 40 homes. Members wanted to be world leading but we have found ourselves harmed the most by this ambition because DEFRA is leading something that we also need DLUHC to be shaping.

We should be following the lead of nations such as Finland and their 'Biodiversity Buildings', while using

the work begun by NHBC and their 'Biodiversity in new housing developments: creating wildlife-friendly communities' guidance. However, these solutions must be part of the BNG metric calculation and sites of under 40 are an excellent testing environment for that and already considered by automated BNG tool providers, such as JoesBlooms, who the HBA has already been working with.

We are not aware of artificial grass being a concern when projects are completed and would therefore direct the Government to explore what opportunities there are to deliver on-site solutions via BNG metrics.

Q.38 Do you agree that this is the right approach to making sure that the food production value of high value farmland is adequately weighted in the planning process, in addition to current references in the Framework on best and most versatile agricultural land?

The NFU has said their major concerns for agricultural land loss is energy rewilding and BNG/nutrient neutrality, rather than housing. Their concerns featured prominently in their Environment Act 2022 consultation response.

However, if the Government is planning to weight toward high value farmland for food production, it should also weight against low value farmland which is an option for a variety of development opportunities. Simultaneously, it should help farmers to increase yields through innovation and support more homes for their workers.

Q.39: What method and actions could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

We have seen several proposals but we do not believe any suggestions are adequate or proportionate. The Government should therefore take the view that it should encourage low carbon places but this would involve road expansion to incorporate cycle lanes, reopening rail lines, setting aside land for non-housing needs and retaining brownfield, plus densifying existing communities and expanding urban areas to incorporate all the elements of 15 minute cities.

15 minute cities also need to be considered as many places within One Hour Regions.

Q.40 Do you have any views on how planning policy could support climate change adaptation further, including through the use of nature-based solutions which provide multi-functional benefits?

Please see answers contained in answers to Questions 37 and 39.

We also welcome stacking strategies so that double counting delivers better outcomes for the environment and the construction industry.

Q.41: Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

Yes.

Q.42: Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

Yes; however, we would encourage the Government to permit development to avail of this too, so that renewable solutions may support new development but rather than being delivered through building regulations or planning, run by experienced energy providers. We believe this is a strong strategy to, for example, advance, ground source heat pumps or wind turbines.

Builders build homes and while they will deliver energy solutions, site wide approaches with, e.g.-heat network like approaches, as best delivered by external partners; which could be local councils.

Q.43: Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework?

No comment offered.

Do you have any views on specific wording for new footnote 62?

Yes, the Government has not defined what 'appropriately addressed' means or how that is decided. This is required for the policy to deliver in practice.

Q.44: Do you agree with our proposed new Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

Yes, although the HBA would go further and proposes a Retrofit Planning Framework to achieve this, which begins as a trial in several LPA's. We have found that Conservation Areas are a major barrier to the delivery of solutions such as ASHPs and solar panels on new and existing homes.

Q.45: Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

No. The timeframe is too long and the Government must stop LPAs from withdrawing or delaying their local plans and instead, expect submission. The Government believes local plans will make up for their removal of housing supply targets and it should prove that first, as currently the plan delays are showing the strategy is one of decreasing housing supply.

Q.46: Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

LPAs with a local plan more than five years old should submit for examination by the middle of 2024 and those notifying of a local plan by the end of 2023.

Q.47: Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

Neighbourhood plans should follow similar timelines to local plans.

Q.48: Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

Thirty months is too long and the Government should be pushing for LPAs to have up to date plans within eighteen, not thirty months, particularly as it would like to introduce NDMP's to reduce paperwork. We therefore propose eighteen months, which should be plenty of time to prepare and get used to the new timescales.

Q.49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

Yes. Although we do not believe the proposed NDMP's go far enough and permit localism to continue to set agendas, for example energy efficiency. We welcome the attempt to reduce ambiguity and set the processes that the NPPF tried to set but did not achieve in practice.

Q.50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

The NDMP should set maximum standards, not minimum. The variation that continues to exist, for example – Part L or embodied carbon, remains a major barrier for SME builders and moving the industry forward as one, including the skilled workforce to support it.

The Government should be setting a national agenda so that all of industry moves toward one standard, rather than permitting localism to decide that NDMP should not apply in their areas. Cementing a national standard will also ensure that SMEs do not have to go through the expensive legal challenge process that PLCs are more able to go through. We therefore believe that as Building Regs are not sacrosanct and neither is the Part L uplift, they should be included in NDMPs.

Q.51: Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

Yes, and as we note in Question 50, in order to not have considerable variation across 330+ LPAs, we must have national certainty and strategy

Q.52: Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

- Net Zero, relating to buildings and embodied carbon.
- Biodiversity Net Gain.
- Nutrient Neutrality.
- Agricultural homes.
- Industry support, e.g.-regional strategies and commercial premises for climate related industries.
- Renewable energy.
- Ignored elements of 15 minute cities, such as employment land, specifically manufacturing.

Q.53: What, if any, planning policies do you think could be included in a new Framework to help achieve the 12 levelling up missions in the Levelling Up White Paper?

Sectoral Development Management Plans – These would target sectors in need of support that the planning system restricts. This is a prevalent strategy in South Korea but the introduce Acts to deliver targeted outcomes. Farming, fishing, green technology are just three candidates which require national and/or regional help.

Devolved Development Management Plans – County of Mayoral powers to legally set the direction expected to deliver regional strategies.

Local Value Weighting – SMEs train 7 in 10 construction apprentices, are 90% of training capacity and typically employ within 20 miles of their head office. Yet this is totally ignored by local authorities, despite meeting most of the 12 levelling up missions.

Area allocations – Planning for the Future created competition in the market by permitting an area to come forward for potential allocation, and encouraging land owners to compete for land. We believe this is a sound strategy to stop the spiralling cost of land while offering councils an opportunity to land arrange using CPO on strategic land strips which may sit between or around allocated sites.

One Hour Regions – Behind every good 15 minute city is its 15 minute city neighbour and because it will be very difficult to level up with localism, the Government should consider One Hour Regions as part of their strategy. The Randstad, Paris and London are all 'One Hour Regions' with many 15 minute cities and we should therefore shift the debate away from localism and on to ways to ensure residents are able to avail of all their needs withing their region.

National Retrofit Planning Framework – In order to reduce the cost of retrofit and net zero solutions, planning needs to enable consumers. This will ensure government funding goes much further, after those who can afford to pay have started adoption at scale, while also encouraging innovation from businesses who know there is a pipeline of opportunity. This suggestion already exists in the National Retrofit Strategy and was developed by the NFB policy team, which sits on the Construction Leadership Councils RMI group.

Q.54: How do you think the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the levelling up agenda?

See answers in question 53.

We believe a section titled 'Productivity enabled by planning' is required and it should set out how LPA's report on key aspects of their plan making. It should include, but not be limited to, time taken for permissions and delivery of strategic projects, barriers based on national infrastructure limitations and their employment growth, listed by sector. This would allow regions to better collaborate, while permitting a comparison across England.

Q.55: Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

Only by supporting 'Community Density'. Our major urban cores need far higher density and gentle densification simply passes the problem to the next generation.

As we have identified brownfield land meets non-housing need, therefore once lost, growth potential goes too. We therefore caution the Government to not see it as a silver bullet because it is not, the Government is setting itself and the nation up for a fall if it densifies non-housing land with residential property and is left with no or little land to meet non-housing needs.

Brownfield first is also problematic because brownfield in Bradford doesn't help growth in Barnstaple but will restrict it.

Q.56: Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups feel safe in our public spaces, including for example policies on lighting/street lighting?

All persons should feel safer in public spaces and therefore efforts to increase public safety through design are welcomed.

Q.57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

The Government must emphasise what it is trying to achieve in practical terms, so that the framework for ambition is clear.

Q.58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

The 15 minute city concept is creating some concerns and for disabled persons it is obvious why. An analysis of several council motions on the concept reveals that vehicle restriction is very high on the priority list but ensuring there is land for various employment needs, as well as the impacts on disabled persons, barely, or does not feature. Sheffield City Councils motion is one such example.

<https://democracy.sheffield.gov.uk/mgAi.aspx?ID=25264>

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