



Housing, Communities and Local Government Committee

House of Commons, London SW1A 0AA

Tel 020 7219 4972 Email hclgcom@parliament.uk Website www.parliament.uk

Dominic Raab MP
Minister of State for Housing
Ministry of Housing, Communities and Local Government
Fry Building
2 Marsham Street
London
SW1P 4DF

4 June 2018

Dear Dominic,

Re: Draft revised National Planning Policy Framework

Thank you for your letter of 21 May, responding to the Committee's letter concerning the proposed standard methodology for assessing housing need set out in the draft National Planning Policy Framework (NPPF). Thank you too for confirming that our correspondence will be considered alongside other responses to the consultation into the draft NPPF.

It is disappointing, however, that your letter gives the Committee the strong impression that the Government has already decided to proceed with its proposed methodology, regardless of the informed and widespread critiques received during this consultation process and from the 'Planning for the Right Homes in the Right Places' consultation undertaken in 2017. Consultations are meaningless if the Government has no intention of listening to the feedback it receives.

Nevertheless, I am writing on behalf of the Committee to respond to your letter and ask that these further comments will also be considered as part of the consultation process and reflected in the final NPPF.

Overall target for houses

Your letter notes that the draft NPPF does not set a specific target for house building, but has instead established a formula to determine this. Nevertheless, this formula and, in particular, the figures that your Department has derived from it, will be used as the basis for arguments at Local Plan and other public inquiries; by home builders if a local authority proposes to build fewer houses, as well as by some members of the public if the local authority plans to build more.

Sustainability and Capacity

It is noteworthy that your letter refers only to the possibility for local authorities to build more houses than the proposed standard methodology prescribes, not fewer. However, it is plainly true that many areas will not be able to provide the number of houses required through the proposed formula, especially in London. It is important that the Government acknowledges that concerns around sustainability and capacity cannot be addressed simply through building more infrastructure.

Local democracy

We are concerned that the Government's proposed approach, which includes a centrally generated set of figures for local housing need, is contrary to the spirit of localism and would undermine local democratic accountability. The Local Government Association recently warned that, due to provisions allowing private developers to ignore Local Plans where housebuilding targets are not met, approximately 165,000 homes could be built by bypassing Local Plans by 2020. The Committee shares these concerns and urges the Government to place safeguards into the final NPPF to ensure that local communities continue to have meaningful oversight of housing developments in their areas. We would also welcome your views as to why, in areas where there are genuine local reasons for which targets cannot be met, local communities should have development imposed on them by developers without any consultation or involvement of local communities and contrary to local plans.

The Committee looks forward to the publication of the final NPPF in the summer and will be interested to see what changes have been made to the proposed standard methodology in light of the feedback received through the two consultations. In this context, as you are aware, the Committee is currently conducting two inquiries with relevance to the revised NPPF, on planning guidance for fracking and land value capture. We plan to publish both reports before the summer recess and I trust that you will take account of the findings of both in your final revision of the NPPF.

A handwritten signature in black ink, appearing to read 'Clive Betts', written in a cursive style.

Clive Betts MP
Chair, Housing, Communities and Local Government Committee