



PricedOut Response to NPPF Consultation

Question 1 - Yes. It is absolutely right that the Government is undoing the destructive weakening of targets, once again making sure that local authorities have to deliver sufficient homes. This is a very positive step showing real commitment from the department to fighting the housing crisis.

Question 3 - See our answer to questions 16-18. We believe that keeping higher targets in cities, especially in London would be a good thing, but this could be achieved through other methods than the urban uplift.

Question 6 - Do you agree that the presumption in favour of sustainable development should be amended as proposed?

Yes. It is important that planning permissions cannot be stalled or slow-rolled by individual truculent councils. Strengthening the presumption is a good way to do this.

Question 15 - Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No. Percentage of stock is a better baseline than the flawed household projections, but ideally the targets should be set on a pure affordability basis. The key place to deliver homes quickly is in the areas where the crisis is most acute.

Question 16 - Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

No. It would be more appropriate to use a metric of the excess of average home prices per square foot compared to construction costs in the local area, to measure the excess housing costs caused by unduly restrictive planning. As construction cost data is unreliable but does not vary enormously, it would be enough to use just average home prices per square foot. The Greater London Authority has gathered a dataset for the whole country which could readily be turned into average values for each local authority by an external consultant.

Question 17 - Do you agree that affordability is given an appropriate weighting within the proposed standard method?

No, affordability should be weighted even more strongly to make up for the removal of the urban uplift. The loss of 20,000 for the London target is a missed opportunity, given that the crisis is at its worst in the capital and new homes in the capital will go further in meeting the national mission of growth. It would be a mistake to reduce ambition in London at a time when the Government has made such strides in fixing planning in the rest of the country.



One option, without increasing the weight of affordability would be to reintroduce a 'London uplift' of 25%. This would maintain the target for the city at over 100,000 homes, ensuring that action is focused where the crisis is worst.

Another option would be to increase the weighting on the affordability ratio to 0.85. This would have the effect of increasing the London housing target to above 100,000, as well as the targets for other very unaffordable areas.

Should the Government wish to keep the national target at 370,000 homes a year, the parameters of the model could be changed to increase London's housing target to 100,000. One option to achieve this would be to change:

- The stock coefficient (currently 0.8%) to 0.46%
- The affordability coefficient (currently 0.6) to 2.4
- The affordability normalisation constant (currently 4) to 5

This would leave the national target at about 370,000, and London's at 100,000.

Any of these options, or indeed any changes that increased London's target would be preferable to the current proposals.

Question 18 - Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Ideally yes. Given a good measure of earnings to rents, this could be incorporated into the affordability adjustment factor. Any changes to the formula, however, should be careful not to reduce London's target, and would ideally increase it.

Question 56 - Community led development changes

Yes. Community led development has led to some of the best projects in urban planning in recent years, so all schemes that enable residents to bring forward their own ideas are very welcome. In addition to these changes we would be delighted if the Government could, through the NPPF or other means, encourage the types of community-led development such as street votes and estate renewal.

Question 60 - Upward extension

No. The Government's ambition on upward extensions is very welcome, making it easier for people to expand their homes will deliver much needed extra floor space in cities. However the amendments regarding the requirement for simultaneity should read as follows:

A condition of simultaneous development should not be imposed on an application for multiple single storey upward extensions in a row of similar buildings unless there is an exceptional justification.

In addition, extensions should be required to be designed in such a way as to be harmonious with the existing building, or in compliance with a local design code if one exists.