

Appendix 1 – Responses to consultation

Giving significant weight to the benefits of delivering homes on brownfield land

Q.1: Do you agree we should change national planning policy to make clear local planning authorities should give significant weight to the benefits of delivering as many homes as possible [yes/no]? If not, why not?

Yes, but only on previously developed land which is in a sustainable location. Not all previously developed sites are appropriately located, particularly in rural districts where some brownfield sites do not have suitable access to existing infrastructure including local facilities, such as supermarkets and transport networks.

High density development done well, in the right location, can be very positive, however if done poorly it has the potential to create significant social problems. The requirement to “give significant weight to the benefit of delivering as many homes as possible” must therefore be caveated to ensure that the homes to be delivered are suitable and to meet the required size, mix and tenure for the area. The homes need to be of an innovative approach and architecture, so as not to be of detriment to the health, wellbeing, and enjoyment of future owners/occupiers. Developments must provide the kind of homes in which people actually want to live in.

Q.2: Do you agree we should change national planning policy to make clear local planning authorities should take a flexible approach in applying planning policies or guidance relating to the internal layout of development [yes/no]? If not, why not?

Yes, so long as the flexible approach to the internal layout of development does not compromise acceptable living standards.

A lack of space can compromise the basic lifestyle needs that many people take for granted, like having enough space to store possessions, play, exercise or entertain friends. The RIBA work on a ‘Case for Space’ emphasises that space can have a “profound knock-on effects on health, educational attainment, family relationships and even social cohesion”.

Q.3: If we were to make the change set out in question 2, do you agree this change should only apply to local policies or guidance concerned with the internal layout of developments [yes/no]? If not, what else should we consider?

Yes, the change should only apply to the internal layout of developments.

Q.4: In addition to the challenges outlined in paragraph 13, are there any other planning barriers in relation to developing on brownfield land?

Other planning barriers in relation to developing on brownfield land include hinderance from derelict structures, below-ground obstructions or voids, land

contamination, poor ground quality, archaeological features and buried services (in use and redundant).

Q.5: How else could national planning policy better support development on brownfield land, and ensure that it is well served by public transport, is resilient to climate impacts, and creates healthy, liveable and sustainable communities?

National Policy will need to ensure that the new homes, even at higher densities, are built to the highest environmental standards.

Viability challenges which come from developing brownfield sites often result in local planning authorities having to make concessions on matters such as affordable housing provision. A proportion of brownfield development should therefore be ring-fenced for affordable housing.

Q.6: How could national planning policy better support brownfield development on small sites?

By providing additional funding to make-safe potentially contaminated sites, which is a costly and complex endeavour and a major barrier to developing brownfield sites.

Applying the presumption in favour of sustainable development to brownfield applications in major towns and cities

Q.7: Do you agree we should make a change to the Housing Delivery Test threshold for the application of the Presumption in Favour of Sustainable Development on previously developed land [yes/no]?

No comment as Chichester District Council is an authority where urban uplift will apply.

Q.8: Do you agree the threshold should be set at 95% [yes/no]? Please explain your answer.

No comment as Chichester District Council is an authority where urban uplift will apply.

Q.9: Do you agree the change to the Housing Delivery Test threshold should apply to authorities subject to the urban uplift only [yes/no]? If not, where do you think the change should apply?

No comment as Chichester District Council is an authority where urban uplift will apply.

Q.10: Do you agree this should only apply to previously developed land within those authorities subject to the urban uplift [yes/no]?

No comment as Chichester District Council is an authority where urban uplift will apply.

Q.11: Do you agree with the proposal to keep the existing consequences of the Housing Delivery Test the same [yes/no]? If not, why not?

No comment as Chichester District Council is an authority where urban uplift will apply.

Q.12: For the purposes of Housing Delivery Test, the cities and urban centres uplift within the standard method will only apply from the 2022/23 monitoring year (from the 2023 Housing Delivery Test measurement). We therefore propose to make a change to the policy to align with the publication of the Housing Delivery Test 2023 results. Do you agree [yes/no]? If not, why not?

No comment as Chichester District Council is an authority where urban uplift will apply.

Reviewing the threshold for referral of applications to the Mayor of London

Q.13: Do you think the current threshold of 150 residential units for referral of a planning application of potential strategic importance to the Mayor of London is the right level? [yes/no].

No comment.

Q.14: If no, what would you set as the new threshold? [300/500/750/1000/other] Please explain your answer.

No comment.

Public Sector Equality Duty

Q.15: 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.

No comment to make.