

6th June 2018

Dear

Building the Right Homes in the Right Places

As I'm sure you are aware, public consultation on the content of the new National Planning Policy Framework (the NPPF Draft Text Consultation) which is to replace the existing NPPF in July, closed on the 10th of May.

We believe that underlying the Government's intention to replace the existing NPPF is its **mistaken** belief, expressed by then Secretary for Housing, Communities and Local Government, Sajid Javid MP in the Sunday Times 4th March 2018:

- that Councils are responsible for the housing shortage because, in the Government's view, they do not *"really want to build homes that their local community needs"*
- that should Councils fail to meet annual targets they would be *"stripped of their right to decide what gets built in their areas"* - and
- that existing rules had to be changed *'to ease the planning process'* for developers (Sunday Times 4th March 2018).

This desire to make it easier for developers to obtain permissions, and also to increase their profits, is reflected in the 'Draft Text for Consultation. For example,

- Protection for Neighbourhood plans is confusing and caveated and appears to include an impossible-to-achieve requirement for communities to update their Neighbourhood Plans within two years of their being approved at referendum should house-building targets not be met, regardless of the reasons why, including where developers reduce completion rates to maintain profit margins;
- the abandonment of the existing NPPF requirement that: *"Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area"*;
- the retention of the 'viability' test, which has enabled developers to deliver fewer social and affordable homes than is required by local plans, and to justify their under-deliver of essential infrastructure.

Adherence by the Government to its false '*councils are to blame for the housing shortage*' mantra, despite the substantial body of evidence to the contrary, is indicative of the extent to which developers are able to influence planning policies.

At the same time, there is apparent unwillingness of Ministers to provide Councils with the enforceable means needed, and requested by the Local Government Association, to ensure that **developers meet annual house-building targets and five year requirements**.

Instead, Council's will continue to be blamed when developers under-deliver against targets, and the 'presumption in favour' will be invoked to enable these same developers to impose development on communities. This tilted balance is wrong for our communities, for people needing affordable homes and for the natural environment and our wildlife.

Please help us to get a better outcome for local communities by asking the new Secretary of State for Housing, Communities and Local Government, James Brokenshire, to ensure that the new NPPF does not blame councils for the failings of the development industry and that it gives adequate protection to Neighbourhood Plans and the local environment.

Yours sincerely

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Chair of Protect Sussex Group

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Chair CPRE Sussex