

Appendix A- Response to the Strengthening planning policy for brownfield development consultation

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?

It is considered that the NPPF already provides sufficient weight to the delivery of housing. It is also important to remember that there are some places, such as the City of London, where planning for uses other than residential are more important.

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?

Nationally described space standards are currently adopted by many local planning authorities. It is unclear from the consultation material whether reference to policies relating to internal layouts would include the application of these standards or are intended to apply to other policies (e.g. dual aspect design). In combination these policies are intended to protect the amenity of residential occupiers, and additional flexibility could have unintended negative impacts upon the health and wellbeing of future occupiers.

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?

As above. Additionally, the proposed scope of future national development management policies (NDMP) is also currently unknown. It is unclear whether these are likely to introduce additional or update existing standards in relation to internal layouts. Under this scenario the application on the NDMP should remain consistent, so should only apply to applicable local policies.

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

No response.

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?

No response.

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

No response.

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]?

On a national level the presumption in favour of sustainable development on previously developed land would assist in steering development to the most sustainable locations within existing settlements and away from greenfield sites in the first instance. The greatest impact of the introduction of this policy approach could be felt in areas outside the 'urban uplift' areas where the availability of brownfield land as a proportion of supply is likely to be lower.

However, there may also be some unintended consequences of this approach for the 'urban uplift' areas. Further focus on housing delivery could impinge on the ability to deliver wider economic development requirements, including those that are vital to the national economy, such as office development within the City of London.

Although the City Corporation is confident in its ability to provide for its overall housing requirements, however, as the HDT is measured over a three year period delivery can be variable. Under a 'tilted balance' scenario applying significant weight to the delivery of homes on brownfield land could inhibit wider strategy aims for the City of London as a global finance and business hub.

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

As above, on a national level a trigger appears appropriate, however 95% is high, with a significant increase from the current 75% trigger. Alongside the introduction of the 4-year housing supply measure could be unnecessarily unwieldy. If an additional trigger is introduced it should apply to all local planning authorities.

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?

As above, the proposed changes to the housing delivery test threshold should apply nationally to have the greatest desired impact.

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

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?

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?

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 response.

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

No response.

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.

Further analysis may be required of the effects of further densification of 'urban uplift' areas against other non-urban areas and the impacts on those with protected characteristics residing within these areas.