



**Representing 20+ Residents Associations**

### **NPPF Consultation 2024 Response**

**GRA supports change for the better and retention of valued character. Our borough has planned positively, undertaken a painful greenbelt review as part of a new approved local plan and is promoting unlocking river corridor brownfield sites. A significant proportion of recent development has resulted from permitted development and infill. Development of strategic sites is being held back by the need for infrastructure (public and developer funded) and by developers phasing their portfolios. Developing off-campus sites for student accommodation has been popular with developers because this side steps the need for developer SANG contributions and circumvents flood risk restrictions. A station redevelopment given consent under the sustainable development test, prior to local plan adoption, has set the bar low and is being cited as a precedent for subsequent applications being considered applying approved local plan policies. Recent permissions have been very tall, at extremely high density and include next to no affordable housing with developers able to argue this would not be viable given the inflated price they have paid to acquire a site.**

#### **Question 1**

Do you agree that we should reverse the December 2023 changes made to paragraph 61?

We do not oppose reversal if there are effective processes in place for ensuring targets and phasing can be moderated due to capacity constraints (geographical and infrastructure delivery timing).

#### **Question 2**

Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

We do not oppose the principle of a consistent approach to identifying housing need and supply targets as long as there are effective processes in place for ensuring targets and phasing can be moderated due to capacity constraints (geographical and infrastructure delivery timing).

#### **Question 4**

Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

No, we are opposed to this. Local character is a material consideration in determining the scale and distribution of development. There may be circumstances where character affects the distribution and phasing of development and hence the quantum of development in any given plan period.

#### **Question 5**

Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Yes, indicative density should not be determined nationally but at plan-making stage within a clear spatial strategy. It is crucial policy acknowledges that indicative density in spatial visions may be affected by the proportion of a site needed for sustainable drainage/flood risk management or by the consequences of landscape/environmental/character assessment. Hence, any indicative density at plan-making stage should be open to moderation not treated as an entitlement. This is necessary to prevent developers paying inflated site acquisition prices based on unrealistic density assumptions which then squeezes margins available for % affordable homes and creates pressure for overdevelopment.

The consultation seeks to address this issue, in relation to green belt and sites given permission outside the scope of a plan under the sustainability test. However, this is a much wider issue affecting brownfield sites and allocated sites too. It matters because it leads to overdevelopment and is squeezing the proportion of affordable homes close to 0%. Having effective recognition of constraints and capacity to moderate density assumptions, far from constraining growth, will unlock delivery of more homes especially more affordable homes.

#### **Question 6**

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

We advise caution over when this test is triggered in relation to housing supply. Using five year land supply as a trigger is too crude a measure and could be counter-productive. The “five year” supply often already has an uplift built into it to allow for under delivery. It is important to avoid Councils being required to apply this test due to disruptions to the phasing of delivery such as covid or infrastructure phasing. It is possible that a relatively recent, ambitious plan has seen some relatively minor disruption to delivery but is fundamentally sound. We submit that in such

circumstances it would be better for the delivery of development, and for housing supply in particular, to enable the LPA to focus on delivery of an existing plan and the sites allocated within that. Otherwise, there is a real risk:

- LPAs will get side tracked into plan revision to avoid ad hoc development when they would be more productive putting stretched resources into seeing through the plan they have.
- developers will get side tracked into promoting sites outside the scope of the plan with few strings attached rather than progressing the sites they already have allocated within a plan.

That is a current concern in Guildford. There is a strong case for saying it would be far better to deliver the current ambitious plan than spend millions on a plan review as currently proposed. Ambitious development could be achieved without a wholesale revision being triggered to avoid this sustainable development test being applied to ad hoc development.

We propose that the presumption should only be used to establish permission in principle. An applicant should then apply to the planning authority for fast track detailed or outline permission to ensure that appropriate policies are applied and substandard development avoided. Otherwise, 'sustainable' is a misnomer and infrastructure contributions and fundamental place-making requirements are avoided.

It is also important to be aware that permission using the sustainable development test, which when balancing harm against benefit only seeks to avoid significant harm, can set expectations low relating to height, cramming and absence of amenity space which subsequent applicants seek to emulate even though their application is being considered under approved plan policies. It leaves LPAs on the back foot trying to improve subsequent applications.

### **Question 7**

Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

No, we are strongly opposed to reversal of these particular changes introduced for good reason in 2023. The proportion of "undeliverable" allocated sites is very small. The issue is that developers find it more attractive to focus on easy, unallocated sites as opposed to strategic sites requiring a more comprehensive, well planned approach to development. If a plan is fundamentally sound, it is crucial to stick with it rather than to disrupt and undermine it.

Many 5 year supply figures in plans already have an uplift factored to allow for under delivery risks.

### **Question 8**

Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

No we strongly oppose this. Supply is lumpy and can peak when major development comes onstream or an infrastructure project is delivered that unlocks potential such as a flood scheme. Averaging out over time is far more important for sustained growth in supply. In areas where there are challenges finding sites, “over supply” could be disincentivised if it means future targets are increased. Better to keep the targets steady and allow over-delivery to be achieved and rewarded through new homes bonus.

### **Question 9**

Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

If a 5% buffer is reinstated, this should be taken into account when considering the trigger for applying the sustainable development test to applications.

### **Question 10**

If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

5% maximum if applied.

### **Question 11**

Do you agree with the removal of policy on Annual Position Statements?

Annual position statements are a potentially useful vehicle for appreciating the profile of supply and fluctuations.

### **Question 12**

Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

The duty to cooperate is a hurdle and negotiation to be overcome devoid of meaning where it is not supported by genuine and meaningful partnerships between authorities. Change in this area should follow the structural changes proposed rather than vice versa.

### **Question 13**

Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Where structures are in place for coordination across authorities but not where such structures do not yet exist.

#### **Question 14**

Do you have any other suggestions relating to the proposals in this chapter?

The approach in this chapter is predicated on the assumption that planning is restricting development. This is far too simplistic and all too often development is not progressing where sites have been allocated. Developers hold landbanks, take forward sites with fewest constraints and release sites at a rate that provides cash flow and keeps up prices. Developers are naturally keen to avoid the costs of requisite infrastructure. For example, they might bring forward the first 200 homes on a site, that were allocated free from infrastructure requirement to generate cash for subsequent infrastructure-dependent phases, but then sell the site avoiding reinvestment as envisaged.

Releasing lots of out-of-plan sites risks undermining delivery in plans and harming our economy by undermining the qualities that make the UK an attractive place to live, work and visit. More effective delivery of the system we have, and some allowance for recent disruption to delivery, may be more effective in unlocking housing than promoting a sense that planning undermines our economy. Applying planning well could be the best and fastest way ahead.

Planning has achieved so much in this country and, if we do not appreciate this, we risk irreversible, if well intentioned, harm.

#### **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?

Yes if student accommodation is recognised as a separate category of housing stock. To increase student accommodation at the same rate as general housing stock could have a distorting effect. An appropriate nationally consistent multiplier for student halls of residence will be required.

#### **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 in that there is no evidence that increasing the housing target with an "affordability multiplier" in more expensive areas lowers the price of a home. Developers phase release onto the market to keep prices high. Also commuting patterns are complex and people often change their commuting patterns over time rather than move as they change jobs.

#### **Question 17**

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

No in that there is no evidence that increasing the housing target in more expensive areas lowers the price of a home. Developers phase release onto the market to keep prices high. Also commuting patterns are complex and people often change their commuting patterns over time rather than move as they change jobs. Affordability uplifts simply put more focus on development in areas where there are some employers who pay well and distracts attention from promoting development in areas of opportunity with fewer employers who pay well. With more people working more often from home, it is more important to develop attractive homes in areas of development opportunity. No affordability adjustment should be applied.

### **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?

No an affordability adjustment is ineffective and inappropriate (see Q17).

### **Question 19**

Do you have any additional comments on the proposed method for assessing housing needs?

There should be a cap on growth relative to current housing stock to keep targets realistic and to promote community integration and cohesion. A cap of 40% is high but helps to keep rates of change socially acceptable and serves as a check against promoting change at a rate which could undermine social stability.

We support a cap for London to promote over expansion of the capital at the expense of other regions.

### **Question 20**

Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

We agree there should be more focus on bringing forward brownfield sites for development.

There should be high standards of remediation where brownfield land is contaminated (including avoiding release of pollutants to waterways and groundwater during construction). There should be an increase in provision of sites to accommodate contaminated material to support a greater focus on brownfield development.

It is also vital to ensure flood risk policies, including the sequential test, are applied to avoid development of homes that place people at flood risk and increase costs for

society (human and insurance) dealing with the consequences. Brownfield layout and density should allow for surface water and flood risk management.

It is crucial to address the link between the way 5 year supply targets are applied and the ambition to bring forward more brownfield development. Site assembly and remediation issues can mean brownfield sites take longer to bring forward for development. This means that, at Local Plan examinations, greenfield sites are presented as a priority to bring forward homes more quickly. If plans are revised frequently to meet 5 year supply, and unallocated greenfield sites are added frequently under the sustainable development test, there is a real danger brownfield sites will keep being pushed back and not given the priority required to bring them forward. Supply targets should be set and monitored in a way that supports rather than undermines progress with brownfield sites. If an authority is progressing well with brownfield delivery but some reprofiling of 5 year supply targets is required, this could be better for the delivery of homes than perpetually undermining brownfield delivery by adding in ad hoc greenfield sites.

There needs to be more scope for objective judgement, perhaps by a housing delivery inspector at the Planning Inspectorate, on whether a Plan should be reviewed or whether an LPA should focus on seeing through brownfield delivery within an existing plan to a revised delivery profile.

The way delivery is reported nationally should capture capacity within reprofiled schemes so local and national government can be given deserved credit for any more complex brownfield sites being brought forward.

### **Question 21**

Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

No. The Green Belt serves a specific planning purpose, in terms of preserving openness and preventing sprawl. It is not an environmental designation. Where Green Belt land has previously been developed there are clear policies for ensuring any development on such sites is of a similar footprint and profile such that it does not change the impact on openness (unless special circumstances apply). Hence, for example, a former airfield should remain “open”.

Although a clever marketing strategy, the concept of grey belt and encouraging development on previously developed land in the Green Belt would completely undermine the logic and purpose of Green Belt designation. It would set in train a dynamic where developers who hold Green Belt land speculatively could allow the land to become run down or put permitted agricultural and other permitted development on the land in order to promote subsequent grey belt development. Green Belt would

become a degraded constriction around major settlements rather than a device for avoiding sprawl and merging which provides an attractive quality of the UK, namely countryside around and gaps between cities.

If there is a case for looking at the extent and distribution of Green Belt around towns and cities, this should be done by **national strategic or Local Plan review, based on the Green Belt purposes of openness between major settlements and avoiding sprawl. Strategic gaps should be retained between settlements and should be prioritised regardless of the quality of the Green Belt land between those settlements.**

A focus on PDL is the wrong consideration and driver for change because it is insufficiently linked to the strategic purpose of Green Belt and will trigger deterioration in the quality of Green Belt. We are not opposing change, we are deeply concerned that the approach proposed will result in settlements merging, Green Belt pock-marked by development to the extent it loses its openness and a dash to turn green belt grey via permitted development such that it can be deemed grey and developed.

#### **Question 22**

Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Just because an area of Green Belt has had an agricultural use under permitted development, such as glass houses or polytunnels or a farm shed, does not make it an appropriate location for development in Green Belt. It may be far better for Green Belt purposes (avoiding sprawl and coalescence) and for sustainability and landscape impact to identify an urban extension on green land adjoining an urban area and to leave an area that has had agricultural development or a former airfield as open land to provide a gap between settlements and avoid sprawl.

#### **Question 24**

Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

If the proposed approach is pursued, additional measures would be essential but hard to achieve. The fact this question is necessary is an illustration of why the proposed approach is flawed. Any review should focus strategically on avoiding sprawl and preventing coalescence.

Green Belt should be protected based on its strategic location regardless of use. Environmental designations should be applied as appropriate to land within Green Belt to protect environmental qualities.



Solar farms, polytunnels and horse stables will be used to create grey belt and enable future housing estates and business parks. Better to plan urban extensions or realign Green Belt boundaries or develop beyond Green Belt in targeted new locations.

#### **Question 25**

Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

This is best addressed in a strategic review of this strategic designation, the outcome of which could be implemented through Local Plan reviews. Plan by plan revisions of Green Belt based on taking out areas with more permitted development or exceptional uses (eg greenhouses, petrol stations, barns, air strips, farm roads) would just result in ribbon development along roads and scattered development undermining the designation and its strategic purpose.

#### **Question 26**

Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

This is the wrong approach. Any guidance on limited contribution would just be used by developers as a target to work towards. Stick to strategic logic for designation. Once designated for strategic reasons, promote environmental, landscape and food production benefits.

#### **Question 27**

Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

It is particularly desirable to focus Local Nature Recovery Strategies on Green Belt due to the proximity to people in adjoining settlements. This should not be linked to Green Belt release unless part of a strategic review of Green Belt boundaries which ensures sprawl and coalescence are avoided.

Promoting development on “grey belt” would make it harder to secure support for nature recovery in Green Belt because developers would be motivated to run their sites down for subsequent development.

#### **Question 28**

Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

No, this is best achieved through strategic Green Belt review rather than assuming authority by authority reviews, linked to developers running down the quality of Green Belt, would achieve a desirable strategic outcome.

**Question 29**

Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

We agree this would be necessary not just for the Plan area but for the entire Green Belt area. However, we believe the proposed approach would undermine the purpose of the designation and that any review should be strategic linked to avoidance of sprawl and coalescence.

**Question 30**

Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

No for all the reasons set out in previous questions. This approach would undermine strategic Green Belt purposes, harm housing delivery from allocated sites and distract from delivery of schemes on brownfield sites.

**Question 31**

Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

No the test of special circumstances should apply.

**Question 36**

Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Yes in the context of strategically driven Green Belt changes.

**Question 37**

Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

Utilising Land Registry data and the skills of the Valuation Office Agency the government should be well placed to provide guidance on benchmark land values where they can

realistically be compared on a price per hectare basis. This should apply to greenbelt land but the difficulty will be determining whether transactional evidence includes hope value and then quantifying and removing it to arrive at a benchmark value. It is likely that the greatest difficulties will be where development pressures and property values are greatest. It may be very difficult in practice to achieve much that is useful. Providing the Land Registry with more data and the VOA with more resources might help. However, BLVs are really a sticking plaster aimed at ensuring that a developer who overpaid for a site does not avoid contributing to affordable housing as a consequence. It's an attempt to remedy some of the flaws in the viability study methodology, but it may be better focusing on removing those.

### **Question 38**

How and at what level should Government set benchmark land values?

Benchmark land values should be set at market value for existing use without the subjective addition of an incentive. Guidance on the level of incentives could be issued separately so an explicit addition could be considered where policymakers felt this was necessary; there are good reasons for incentives to vary by geography, use and level of value and explicit additions could accommodate this.

Should the owner be given extra as an incentive to sell? If the land has been in your family for several centuries, you may be very reluctant to sell, or if you can see it from your manor house, so you can understand those on the red benches arguing the need for an incentive. And people often think their own holdings are worth more than the market, so you would not sell your house or even a share you hold as an investment at market value, because for whatever reason it's worth more to you than the market. So the old (pre 1961) 10% addition could be a useful precedent to consider.

The reference in the paper to uplifts of 20 or 40 times the agricultural value are likely to derive from an analysis of transactions with substantial hope value worked back from a calculation based on a proportion of ultimate development value. This suggests that routinely basing BLVs on high multiples of agricultural value is the wrong approach since the high multiples will only arise when there is a high alternative use value and/or a high probability of achieving consent for that in the near term.

The paper also refers to a multiple of three times "suggested" by some research published by Heriot Watt, but this is a throwaway line with the number three being posited in contrast to what is stated to be an established 15 times. The Letwin report, it says "suggests" 10 times, but in fact, the report suggests a cap at this level, rather than recommending it, and equally states a land value equivalent to 5% of the development value might be appropriate (although it does so in the context of a £2 million per acre development value which is at the upper end), so maybe a percentage of the ultimate development value is a more realistic determinant of base value.

It's worth pointing out that since hope value is so difficult to establish, and for a vendor and purchaser to agree since they have different perspectives on probability, land rarely sells unconditionally in this way. There is a conditional contract with the bulk of the consideration dependent upon the detailed consent obtained. It is therefore the valuer's lot to establish something that the market cannot. So it is important that legislators realise that any tax based on the valuer's opinion is likely to be highly disputatious and slow things down.

### **Question 39**

To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

The objective should be to avoid viability negotiations at all costs. Because the residual value is the difference between two large numbers (cost of the proposed development and future realisation from sales) which themselves are estimates, the residual is very elastic, particularly since the estimates are open to manipulation. It's like charging this year's corporation tax based on an estimate of net profit in five years time.

We are not convinced that benchmark values can be determined with sufficient authority or sufficient realism to link the need for viability negotiations to them in the way proposed.

If a benchmark value included an incentive, then it would be the level of incentive that was the determinant which would be unsatisfactory, given the lack of agreement as to the need for, and level of, incentives.

The suggestion at 5.31 that planning authorities and Homes England could assemble land using compulsory purchase is in our view the answer. And the threat of this with the corresponding compensation arrangements would frame private treaty negotiations. Compensation, the paper says, will disregard the scheme i.e. the development proposals, but could reflect hope value of alternative development that would be feasible by itself, but subject to the golden rules, in particular that 50% of the housing is affordable (subject to viability) potentially introducing all the problems again, except that in the context of compulsory acquisition by public bodies that caveat might not apply. It introduces the prospect of no hope value designations where that is in the public interest. We largely welcome that.

If the greenbelt is permanent, then there should be no hope value for greenbelt land. But as soon as there is the possibility that the greenbelt could become grey belt all landowners will claim hope value as they will argue they have some prospect of development at some stage in the future. Where there is genuine potential to change

the use for more valuable development, then hope value exists. It is real even if it is difficult to quantify.

The principles of the long established compensation for compulsory purchase valuation methodology based on the payment of market value should be the basis of any approach. For major new town developments the No Hope value designation might not add much to the existing compensation code where Denning's example of a petrol station on Dartmoor generating no material value in the no scheme world would probably be enough. But for small desirable sites in the greenbelt, it could be considered unfair to appropriate the site at agricultural value. Maybe in such cases, the designation could amount to a limited amount of hope value being payable. It is important to recognise that if all legitimate claims of hope value are aggregated, they would considerably exceed the actual increase in value, since the land ultimately designated is likely to be a small proportion only of that which might accommodate a given development.

#### **Question 40**

It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Whether a proposed development being policy compliant justifies the argument that no additional contributions to affordable housing should be made, depends entirely on the policy requirement being adequate in the first place. It would be much more satisfactory to make initial modest demands of developers relating to essential infrastructure, for example, and then charge a levy based on a percentage of the ultimate sales prices.

#### **Question 41**

Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

Late stage reviews are another attempt to improve a fundamentally bad system. As currently practised, they allow for only a limited updating of the cost and revenue inputs. And in most cases the developer calls the local authority's bluff, offering slightly more initially with the proviso that there is no late stage review.

So firstly, to mean anything, these need to be mandatory.

Secondly, they need to be much more sophisticated and adopt the type of open book approach that developers working in partnership use whereby actual costs and sales revenues are used as the inputs.

Developers would raise issues of confidentiality, but that is because they currently sustain a cartel so the true costs of development are not available to advisers acting for local authorities. Professionals are used to treating clients information as confidential, and there is no real objection to this approach, which is the only way. The professionals are likely to be external consultants employed by local authorities, as at present, but in most cases, those employed by local authorities, do not act for the developers and although they may do their best, they do not have the knowledge they really need. Local authorities need to be able to pay adequate fees. And the sales prices are publicly available on the land registry website in due course, so there can be no objection to them being used.

If developers wished to keep the costs confidential, then the late stage review could work on the basis of the original ones, which would probably mean they were lower than the actual ones: if the actual costs were substantially higher, then the developer would probably be willing to give the information in confidence.

Conducting the late stage reviews on the basis of the actual figures is very important to introducing sanity to the viability assessment approach. Most planning committee members, of course, assume that this is what a late stage review is but they are being misled.

#### **Question 45**

Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

The paper introduces the prospect of no hope value designations where that is in the public interest. We largely welcome that.

If the greenbelt is permanent, then there should be no hope value for greenbelt land. But as soon as there is the possibility that the greenbelt could become grey belt all landowners will claim hope value as they will argue they have some prospect of development at some stage in the future. Where there is genuine potential to change the use for more valuable development, then hope value exists. It is real even if it is difficult to quantify.

The principles of the long established compensation for compulsory purchase valuation methodology based on the payment of market value should be the basis of any approach. For major new town developments the No Hope value designation might not add much to the existing compensation code where Denning's example of a petrol station on Dartmoor generating no material value in the no scheme world would probably be enough. But for small desirable sites in the greenbelt, it could be considered unfair to appropriate the site at agricultural value. Maybe in such cases, the designation could amount to a limited amount of hope value being payable. It is important to recognise that if all legitimate claims of hope value are aggregated, they

would considerably exceed the actual increase in value, since the land ultimately designated is likely to be a small proportion only of that which might accommodate a given development.

#### **Question 46**

Do you have any other suggestions relating to the proposals in this chapter?

The golden rules approach is an example of trying to pretend that public investment can be paid for by someone else. The windfall gains made by landowners on receipt of planning permission is properly ripe for taxation, particularly since that value is dependent upon public infrastructure. But trying to concoct a direct relationship that applies in all circumstances is very difficult. Land is invariably sold at a base price with a top-up, depending upon the terms of the planning consent ultimately achieved. It should be possible to base a tax on that top-up, rather than a prior estimate of what it might be.

It is debatable whether the government should be concerned with creating houses to buy at slightly below market value. Homes to rent that people can afford, whatever that is called, should be the government objective. A real problem is that as soon as some houses are available under a government promotion, the price goes up so the actual saving tends to evaporate and public money is spent on boosting the profits of developers.

A useful function of government would be to ensure that the long term running and maintenance costs were minimised by requiring high-quality construction. This would not put up house prices, but it might reduce land values.

#### **Question 73**

Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Greater priority should be given to installing solar panels on development, including on frames above car parks, rather than on greenfield sites.