

Rt Hon Angela Rayner MP
Deputy Prime Minister & Secretary of State for Housing, Communities and Local Government
2 Marsham Street
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20th September 2024

RESPONSE TO NPPF CONSULTATION FROM EAST MIDLANDS COUNCILS

East Midlands Councils (EMC) is the collective partnership body for all 40 local authorities in the East Midlands. EMC enables councils to work together on key issues, providing advice and support, and representing the interests of our members to Government and to national organisations.

This is a strategic response to the consultation which complements and amplifies aspects of more detailed submissions made by individual local authorities. It is supported by a short technical annex which is attached.

Background

The East Midlands is a region of 4.9 million people and 368,000 businesses. Our economy has been growing at or around the UK average for much of the last 20 years. The population of the East Midlands has also been growing rapidly over last decade - at the same rate as London and faster than the South East or the West Midlands.

Housing delivery in the East Midlands (as elsewhere) has been heavily influenced by macro-economic forces outside the influence of councils to control but has generally been buoyant and recently above the levels indicated by the current Standard Method (Figure 1).

However, Treasury analysis has demonstrated that levels of public investment in the East Midlands are persistently below the UK average across all functions (Figure 2). In particular, transport investment per head in the Region has been in relative decline for many years and now stands at only 56% of the UK average (Figure 3).

As a result, there is a growing infrastructure deficit in the East Midlands which leading to increasingly unsustainable patterns of development and movement as well as poor-quality outcomes for our communities.

Key Issues

EMC shares the Government's ambition to increase the delivery of good quality and affordable homes underpinned by appropriate local and strategic infrastructure. EMC strongly endorses the Government's commitment to a 'plan led' planning system, increasing the delivery of social housing and the decision not to progress with the previous Government's proposed 'Infrastructure Levy'.

EMC is also supportive in principle of the Government's intention to re-introduce some form of statutory sub-regional strategic planning. In the East Midlands there are well established joint planning arrangements in Central Lincolnshire, Greater Nottingham and in Leicester & Leicestershire which can provide a solid foundation for a new system.

However, we are concerned that some of the consultation proposals may have unintended consequences which could undermine the Government's stated objectives and should be subject to further consideration before any formal changes are made.

Proposed Standard Method for Assessing Housing Need

The proposed standard method is based on two elements: a 'base level' equivalent to 0.8% of existing housing stock, plus an uplift to address 'affordability'. Whilst simple to calculate, the proposed method is unrelated to readily available ONS based population and household data, including information on migration and commuting flows. Nor is it consistent with standard economic and transport modelling tools used to identify public and private investment priorities. There is therefore a risk that future housing development will become further dislocated from job growth and infrastructure delivery, undermining productivity and increasing environmental costs.

In terms of the 'base level' calculation, it is not clear how the 0.8% figure has been determined, or why the Government believes that it should be applied to all areas regardless of their local growth or regeneration needs.

Our analysis of the East Midlands (set out in Figure 4) demonstrates that the affordability uplift does have a significant impact, doubling the rate of housing growth in some rural and suburban areas. However, the Government has presented no evidence that these increases will have any material impact on house prices or wages rates (the key components of affordability), either at the local authority level or more broadly.

Function and Definition of 'Greybelt'

The Government is proposing to introduce a new planning concept of 'Greybelt'. We acknowledge that not all designated Greenbelt is of the same environmental quality and nor will it perform equally well against the stated purposes of Greenbelt policy as set out in the NPPF. However, we believe such issues are most effectively addressed through the established mechanism of strategic Greenbelt reviews rather than by introducing new designations into an already complex policy landscape.

If the Government persists with the concept of 'greybelt', it is important that a tighter and more specific definition is used than that set out in the draft NPPF in order to avoid both unplanned speculative development and debilitating legal challenges.

Process for Identifying New & Expanded Towns

EMC recognises the potential of new and expanded towns to contribute to the nation's housing needs. The East Midlands has played an active part in Government led growth initiatives in the past. We understand that several councils in the Region are actively considering options for major planned growth in their areas.

However, the process and timescales by which the New Towns Task Force will make recommendations is unclear and it seems that new homes delivered will not count towards meeting local housing targets. This is causing uncertainty and anxiety. We are also keen that the Government avoids the mistakes of the former 'Eco-Towns' initiative, which was open to speculative private sector led proposals and undermined public confidence in the statutory planning system. It is clear to us that to be successful, proposals for major planned growth must have the active support of local government and be set within a clear strategic policy context.

Workforce Challenges

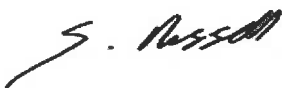
Finally, we whilst welcome the Government's plans to recruit an additional 300 local government planners, we believe that concerted long term investment will be required to secure and maintain the workforce necessary to deliver the Government's vision.

We hope you find these comments helpful and constructive. We are of course happy to discuss further with you any of the issues we have raised.

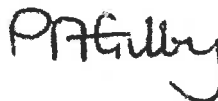
Yours sincerely



Cllr Martin Hill OBE
Chair of EMC
Leader of Lincolnshire CC



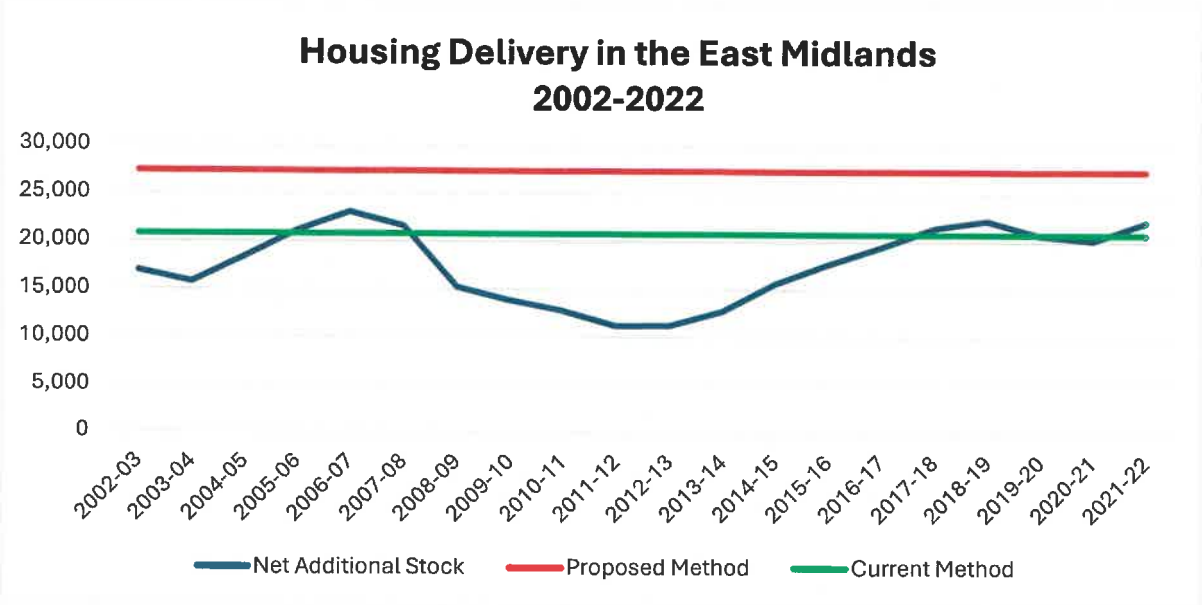
Cllr Sarah Russell
Vice Chair of EMC
Deputy Mayor of Leicester



Cllr Tricia Gilby
Vice Chair of EMC
Leader of Chesterfield BC

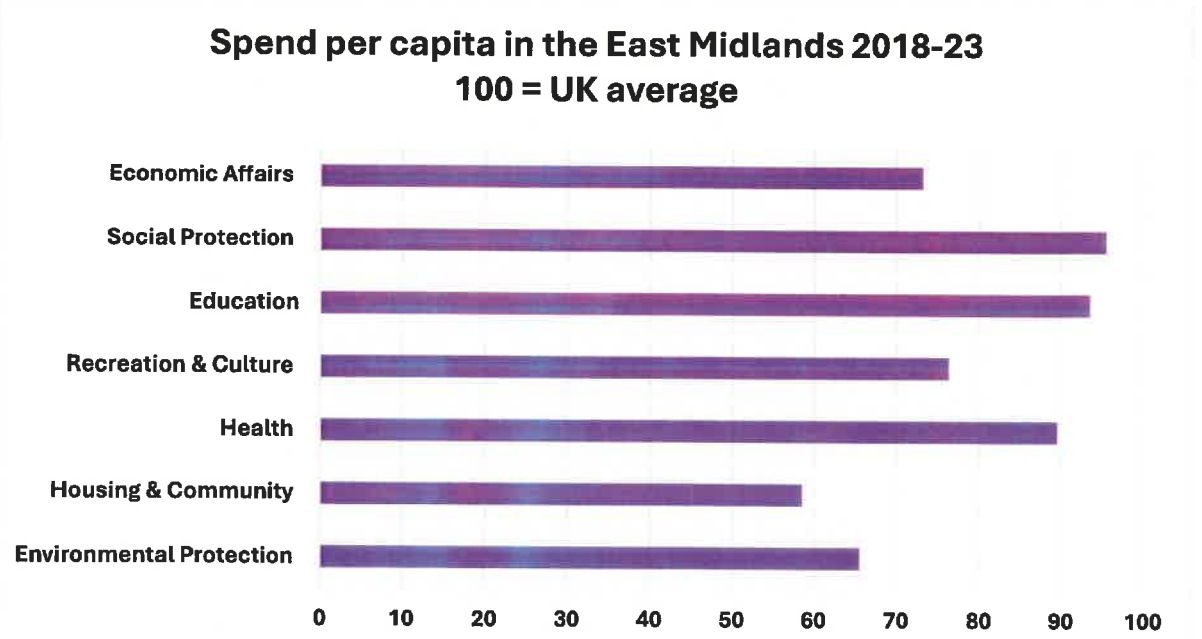
Technical Annex

Figure 1



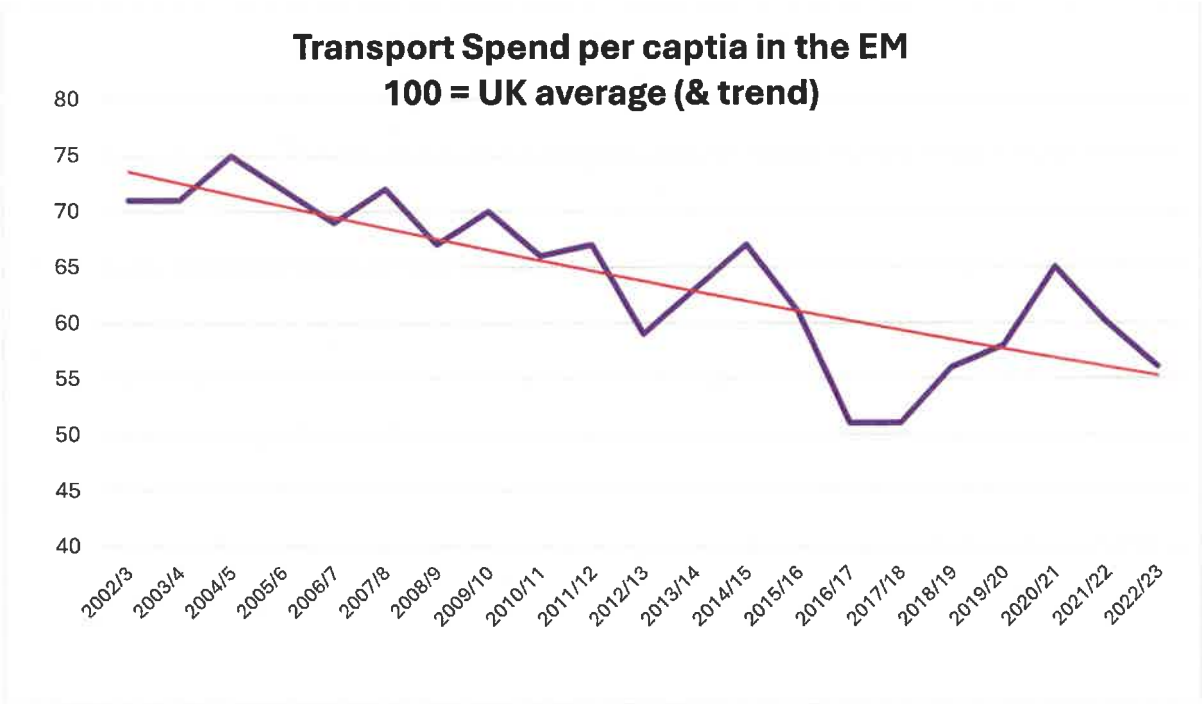
Source: Net Additional Stock: [Live tables on dwelling stock \(including vacants\)](https://www.gov.uk/live-tables-on-dwelling-stock-including-vacants) - GOV.UK (www.gov.uk)

Figure 2



Source: [Public Expenditure Statistical Analyses 2024](https://www.gov.uk/public-expenditure-statistical-analyses-2024) - GOV.UK (www.gov.uk)

Figure 3



Source: [Public Expenditure Statistical Analyses 2024 - GOV.UK \(www.gov.uk\)](#) & previous releases

Figure 4: Analysis of Proposed Method on East Midlands LPAs

LPA	Recent Delivery	Current Method	Proposed Method	0.8% Dwelling Stock Base	Affordability Uplift	% Affordability Uplift
Amber Valley	470	351	682	478	204	43
Ashfield	340	446	604	460	144	31
Bassetlaw	887	260	665	449	216	48
Blaby	290	329	559	354	205	58
Bolsover	498	195	404	306	98	32
Boston	324	250	379	252	127	50
Broxtowe	292	384	658	410	248	60
Charnwood	763	1,115	1,012	626	386	62
Chesterfield	313	211	558	405	153	38
Derby	628	1,244	1,062	906	156	17
Derbyshire Dales	293	216	571	288	283	98
East Lindsey	1,159	437	1,091	716	375	52
Erewash	229	376	569	424	145	34
Gedling	450	460	665	436	229	53
Harborough	981	510	706	351	355	101
High Peak	352	243	585	352	233	66
Hinckley & Bosworth	535	432	689	419	270	64
Leicester	1,014	2,435	1,690	1,097	593	54
Lincoln*	167		459	363	96	26
Mansfield	424	259	540	410	130	32
Melton	340	192	370	195	175	90
Newark and Sherwood	731	437	730	460	270	59
NE Derbyshire	611	224	622	389	233	60
North Kesteven*	581		690	432	258	60
NW Leicestershire	789	357	621	387	234	61
Nottingham	1,442	1,845	1,451	1,105	346	31
Oadby and Wigston	232	198	389	192	197	102
Rushcliffe	917	609	831	433	398	92
Rutland	95	123	264	143	121	85
South Derbyshire	1,018	507	606	397	209	53
South Holland	659	427	573	351	222	63
South Kesteven	551	687	912	535	377	70
West Lindsey*	618		527	368	159	43
N Northamptonshire	1,784	1,856	2,064	1269	795	63
W Northamptonshire	2,115	2,124	2,584	1473	1,111	75
*Cent Lincs Joint Plan		1,054				
EM Total	22,890	20,793	27,382	17,631	9,751	55

Higher Figure	Equivalent Figure	<200 below Proposed Method	50-74% Affordability Uplift	75-99% Affordability Uplift	>100% Affordability Uplift
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