

Street Votes Consultation
Leasehold, Land and Planning Systems Directorate
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Delivered by email only to streetvotes@levellingup.gov.uk

30th January 2024

Dear Sir / Madam

Re : Street Vote Development Orders

Thank you for consulting the Land, Planning and Development Federation (LPDF) on the 'Street Vote Development Orders' consultation paper.

The LPDF was set up in April 2018 and seeks to represent the UK's leading land promoters, home builders and commercial developers.

LPDF members support the housebuilding and commercial development sectors by promoting sites through the planning system, providing "shovel ready" land with a planning permission which can facilitate the delivery of infrastructure and serviced land parcels.

The LPDF seeks to actively engage with government on planning, housing and commercial development policy and to educate the wider public on the social, environmental and economic benefits of development through an evidenced based approach.

The LPDF encourages its members to deliver well designed, high quality, sustainable places which deliver a mix of housing types and tenures, commercial spaces and community uses that have a positive social, environmental, and economic impact.

Our key values include:

- Working in a positive and cooperative way with central and local government and key stakeholders, to deliver a planning system capable of supplying the homes and employment space we need.
- Promoting research and an evidence-led approach to policy development.
- Increasing the supply of new homes to meet demand and make home ownership a realistic possibility for all those who aspire to it.
- Ensuring that we build the affordable homes of all types and tenures that this country so desperately needs.
- Delivering new employment space to meet demand from businesses and support economic growth.

- Championing the impact of increased housing delivery on reducing intergenerational unfairness.
- Creating well designed, high quality and sustainable places to live and work.
- Educating and informing about the social, environmental and economic benefits of development.
- Supporting diversity of delivery in the market and championing SME developers.
- Promoting diversity and inclusivity within the sector.

General Comments

There can be no argument about the country facing a housing crisis, and that current levels of housing delivery, even before the recent changes to the National Planning Policy Framework (NPPF) were made, are not meeting the level of housing need which is required. This is leading to a serious undersupply of both market and affordable housing with many people living in overcrowded, unsuitable and insecure accommodation as a result. It also has grave consequences for the level of economic growth that can be delivered across the country, the health and wellbeing of those unable to secure suitable accommodation and has negative environmental consequences which are associated unsustainable patterns of development.

The LPDF therefore support wide diversification within the planning system, with all options for boosting housing supply needing to be explored. Whilst, 'Street Votes' is not an area with which a majority of our Members will engage, it could become another, albeit limited source of housing supply, which should be encouraged.

However, the LPDF do consider that the process which is set out in the consultation document is unnecessarily complex, will have only limited impact on supply, and could prove to be burdensome on already over-stretched resources within Local Planning Authorities (LPAs).

In its proposed format, the system is unlikely to convince many communities to engage with the process as it is only likely to be taken up within major urban areas, particularly in London. This complexity and limited geographical appeal will mean that the contribution that this source makes to housing supply is only likely to be extremely limited and it will not make any meaningful contribution to addressing the housing crisis that this country faces.

It is for these reasons, that LPAs should not be allowed to not rely on this source of housing delivery within their calculations for meeting their housing requirements which are set out in their local plan. Units that are forecast to be delivered through 'Street Votes' should also make no contribution to an LPAs forecast of windfall housing supply, and any supply that is ultimately derived from this source, should be seen as additional to that which is needed to meet the housing requirement in full across the plan period.

This latter point is especially important given the provisions of para 76 of the NPPF 2023 which states that LPAs do not have to demonstrate a 5-year supply of housing land if their adopted plan is less than 5 years old. Practically, this will mean that any failure to deliver new housing within the first 5 years of a local plan's life, will not be identified until after that five year period has been passed and it is only at this point, that any corrective action can be put in place to address that shortfall. Obviously, it will take a further period of time beyond that to implement and deliver any solution to the undersupply situation that has occurred, meaning any shortfall in supply could endure for a number of years.

Therefore, in order to ensure that LPAs are maintaining a healthy supply of new homes during the first 5 years of any plan period, units derived from 'Street Votes' should be regarded as additional to those which are required to meet the LPAs housing requirement in full.

In addition, the system that is proposed only benefits those residents who currently own a house rather than those residents who are in much greater need because they have not yet been able to access the housing market. As stated above, the system that has been designed is only likely to be taken up in higher value areas of our towns and cities and thus the system benefits those that already have, rather than those that currently do not, a situation that is wholly unsatisfactory in the midst of a housing crisis.

I hope you find these brief general comments of assistance in finalising the 'Street Votes Development Orders' requirements, and if you need any further information about these comments, please do not hesitate to contact the LPDF at the email address shown below.

Yours sincerely



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