

## Response to the Housing White Paper from Hastoe Group

Hastoe is a specialist rural housing association with a strong commitment to environmental sustainability. We operate in more than 250 villages across the south of England and currently manage over 7,000 homes.

We are leaders in building of new affordable homes in rural areas – principally on Rural Exception Sites – and are proud of the fact that our developments are built very much in partnership with local communities. Our expertise in rural housing and our long-established and hard-earned commitment to rural communities, has resulted in many local communities or parish councils inviting us to build affordable homes in their communities. Rural Exception Sites are often the only possible source of new affordable housing in small rural communities, and as such are critical to those communities' continued vitality, viability and survival. These sites deliver about 1,500 rural homes per year and represent about 20% of overall rural delivery.

To this end, Hastoe has signed up to the Rural Housing Pledge which states that we will:

- Work closely with the local community and Parish Council to find the right site;
- Always give qualifying local people in housing need first priority for every home;
- Ensure that affordable homes always remain affordable;
- Build sensitively designed, high quality homes to high environmental standards;
- Provide good quality and locally sensitive management services to our residents;
- Always respond positively to the local community.

Hastoe is responding to this consultation with a view to the impact on our work and on rural communities.

### The issues facing rural communities

England's rural areas house over 9.3 million people (almost one in every five people in England). They are facing a range of inter-connected economic and demographic challenges that are fundamentally different to those faced by urban communities:

1. Rural communities are disproportionately affected by the lack of affordable homes.

Just 8% of homes in rural communities are affordable, compared to nearly 20% in urban areas. "The fair share for new homes in rural areas (relative to population) should be no less than 7,500 homes a year. But in 2013 we built only 2,886". (*source: Rural Housing Policy Review*)

2. The rural housing market is driving local families and young people out of their communities.

On average rural housing costs approximately 11 times the average salary of people working in rural areas – compared to 6.9 times in cities. External drivers are continuing to drive up prices in the rural housing market: migration of people from urban areas (around 50,000 people per year), second home ownership, Right to Buy and holiday lets replacing the market rented sector.

3. The demographics of rural communities are changing dramatically.

Young people and families are moving out of rural areas, while the proportion of older people is increasing. Less than 50 per cent of those living in rural areas are aged below 45 years, compared with almost 60 per cent in urban areas. (Source: Defra).

***Ensuring a steady supply of good quality and affordable new homes in our rural areas will enable those communities to grow and thrive. The Housing White Paper presents us with a***

***golden opportunity to transform the lives of our rural areas and is one that we must seize with both hands.***

**Question 1**

Do you agree with the proposals to:

- a) Make clear in the National Planning Policy Framework that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the Framework, with an additional requirement to plan for the allocations needed to deliver the area's housing requirement?
- b) Use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?
- c) Revise the National Planning Policy Framework to tighten the definition of what evidence is required to support a 'sound' plan?

**Question 2**

What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together?

We welcome the White Paper's broader desire to look at the housing needs of a larger area, as it could better enable a more holistic view of housing need, transport and other infrastructure. Urban sites will undoubtedly account for many of the new homes, but delivering small-scale developments in individual rural communities can also contribute and are essential to ensure that community's survival. We fear than an unintended consequence of the white paper is that it will encourage planning authorities to ignore the vital contribution rural communities could make, by focusing on a small number of larger sites in urban areas in the belief that that will meet housing need most quickly.

Hastoe's experience is that many local authorities already focus on larger scale delivery in towns and do not consider the housing needs of their rural communities. We would like to see local authorities required to consider their rural communities within their strategic priorities document.

**Question 3**

Do you agree with the proposals to:

- a) amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?
- b) from early 2018, use a standardised approach to assessing housing requirements as the baseline for five year housing supply calculations and monitoring housing delivery, in the absence of an up-to-date plan?

We agree with the White Paper's proposals to require local planning authorities to have policies for addressing the housing requirements of groups with particular needs (such as older and disabled people); and to use a standardised approach to assessing housing requirements as the baseline for five year housing supply calculations.

However, in some cases, people applying for homes on Rural Exception Sites can easily get cut out – as they did when many local authorities were allowed to decide on their own criteria for their waiting lists. Many landowners provide land for housing under the Rural Exception Sites policy, because they want the homes built on that land to be allocated for local people who are living or working in that community. A fear that these local people won't be prioritised and that the homes will be let to people in housing need from nearby towns, puts-off landowners and their communities from wanting to develop schemes and will reduce the supply of new homes. It is important to ensure that a process is retained for protecting Rural Exception Sites lettings to people on low incomes who live or work in those villages and who are in housing need.

**Question 5**

Do you agree that regulations should be amended so that all local planning authorities are able to dispose of land with the benefit of planning consent which they have granted to themselves?

We agree that regulations should be amended so that all local planning authorities can dispose of land with the benefit of planning consent which they have granted to themselves.

We also support the Government's plan to consult on enabling planning authorities to dispose of land held for planning purposes at less than best consideration without the need for specific consent from the Secretary of State – as this would enable the delivery of more affordable housing that would be considered viable if that land was sold at the prevailing market value.

**Question 6**

How could land pooling make a more effective contribution to assembling land, and what additional powers or capacity would allow local authorities to play a more active role in land assembly (such as where 'ransom strips' delay or prevent development)?

We welcome measures that enable more collaboration between landowners and planners to assemble land.

However, we wouldn't want this proposal to cannibalise land from Rural Exception Sites, which, as we have already outlined, are often the only possible source of new affordable housing in small rural communities and therefore make a vital contribution to the supply of new rural homes. It is also important not to cause the supply of Rural Exception Sites to dry up because landowners hold on for other uses, 'hope value'.

**Question 8**

Do you agree with the proposals to amend the National Planning Policy Framework to:

- a) highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing?;
- b) encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the authority's housing needs?;
- c) give stronger support for 'rural exception' sites – to make clear that these should be considered positively where they can contribute to meeting identified local housing needs, even if this relies on an element of general market housing to ensure that homes are genuinely affordable for local people?;
- d) make clear that on top of the allowance made for windfall sites, at least 10% of sites allocated for residential development in local plans should be sites of half a hectare or less?;
- e) expect local planning authorities to work with developers to encourage the sub-division of large sites?;
- f) encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly?.

We agree with the proposals to amend the National Planning Policy Framework to:

- a) highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing.
- b) encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the authority's housing needs.

## Housing White Paper response from Hastoe

As we have explained above, Rural Exception Sites make a vital contribution to the supply of new rural homes. In 2015-16, 1,020 affordable homes (source DCLG) were built on Rural Reception Site land – close to one third of the 3,690 affordable homes built in communities of less than 3,000 people. Unfortunately, this is a 38% reduction in the figures for 2014 and 2015 – in part, we feel, caused by the fear of the impact that the voluntary Right to Buy may have on the ongoing affordability of homes built on Rural Exception Sites. To encourage more Rural Exception Sites to be brought forward for development, we would urge a complete exemption from the Voluntary Right to Buy for homes on Rural Exception Sites (regardless of the landlord).

We would also welcome a holistic approach to looking at the ‘sustainability’ of villages. Although the supply of affordable homes is key, these homes need to be built in communities that are desirable to live in. Many currently suffer from deficiencies in key infrastructure, such as poor broadband connectivity (see also our response to question 19) and infrequent or expensive transport links. Additionally, many rural inhabitants hold-down more than one job (maybe they work on a farm by day and in the village pub in the evenings) and, as this employment is often short-term, precarious and seasonal, people need to live near to their places of work.

Without action to address these deficiencies, younger people will continue to leave rural areas, even if housing supply improves.

### c) give stronger support for Rural Exception Sites.

We agree that Rural Exception Sites should be considered positively where they can contribute to meeting identified local housing needs. However, while open market housing can be necessary on some Rural Exception Sites, we would urge that the proportion of open market housing on such sites (including Starter Homes) is minimised wherever possible, because:

- 1) Such homes are not affordable to the overwhelming majority of local people.
- 2) We know that the prospect of having to include unaffordable homes (that can subsequently be sold on) on their Rural Exception Site, acts as a powerful disincentive to many rural landowners who would otherwise offer land for Rural Reception Site development. As we expand on below, market sale should be the last resort to make a scheme viable – better that landowners or builders are incentivised to build affordable homes.

Hastoe would therefore like to see more protection for land values on Rural Exception Sites. We generally pay a low price per housing plot for Rural Exception Site land – one that enables genuinely affordable homes to be viably built. However, we have heard about values of up to £50,000 per plot in Hampshire (on sites where half the homes are for open market sale). Hastoe strongly feels that open market sale home should only be built on Rural Exception Sites to cross-subsidise affordable house building, and not to inflate Rural Exception Sites land values. If the integrity and affordability of Rural Exception Sites is to be protected, land values should be a multiple of agricultural value and not connected to development land values.

Hastoe also feels that landowners and local authorities should have a better awareness and understanding of the Rural Exception Site policy and its uses. For example, rural local authorities could be provided with guidance (with case studies on exemplar local authorities such as Cornwall) and how they can facilitate bringing these sites forward.

- d) make clear that on top of the allowance made for windfall sites, at least 10% of sites allocated for residential development in local plans should be sites of half a hectare or less.
- e) expect local planning authorities to work with developers to encourage the sub-division of large sites – as this would better enable SME builders and local firms to be involved. However, Hastoe would want policy to be tightened, so that developers are unable to simply parcel a larger site up into blocks of less than 10 homes, to avoid their affordable housing obligations that come with larger sites. We feel strongly that all sites – regardless of size and especially in rural areas – should not be

## Housing White Paper response from Hastoe

exempted from an affordable housing requirement. About two thirds of rural affordable homes have come from this S106 quota on small sites and this policy should be reversed. Or at the very least, its impact on rural communities monitored.

- f) encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly.

### Question 9

How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?

We support the idea of garden villages, but are unconvinced that development corporations and local development orders will be necessary to deliver them – although they may have their place. Central to the ease of creating any new development is the willingness of the surrounding communities to accommodate the new homes in their area. Hastoe has long been a champion of genuine, high-quality, community-led development for many years and uses a model that is more common in rural development than urban – one which could be applied to the wave of new garden towns and villages.

In many rural communities, it is the community itself that recognises the need for more homes – to enable local people to be able to stay living in and contributing to their community. The process starts with the community – it is the community that decides how the homes are to be delivered, either through working in partnership with a housing association or, perhaps by setting up a Community Land Trust (which may work independently or in partnership with a housing association). This development model has proved to be highly successful in rural communities and is very often promoted by word of mouth. We know that some villages are now working on their fourth project – another indication of the positive experience.

This diagram, from the CPRE report 'On solid ground', shows how community-led development works in practice:



**Question 10**

Do you agree with the proposals to amend the National Planning Policy Framework to make clear that:

- a) authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?
- b) where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality or accessibility of remaining Green Belt land?
- c) appropriate facilities for existing cemeteries should not to be regarded as 'inappropriate development' in the Green Belt?
- d) development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt?
- e) where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined through a neighbourhood plan (or plans) for the area in question?
- f) when carrying out a Green Belt review, local planning authorities should look first at using any Green Belt land which has been previously developed and/or which surrounds transport hubs?

We agree with the proposals to amend the National Planning Policy Framework in this question.

However, re point b) (where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality or accessibility of remaining Green Belt land), we would want Rural Exception Sites (where they fall in the green belt) to be excluded from this requirement.

**Question 12**

We agree with the proposals to amend the National Planning Policy Framework to:

- a) indicate that local planning authorities should provide neighbourhood planning groups with a housing requirement figure, where this is sought.  

Allowing neighbourhood planning groups to obtain a housing requirement figure from their local authority will ensure a joined-up approach to housing need and will reduce the conflict that can occur between neighbourhood plans and local plans.
- b) make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) set out clear design expectations; and that visual tools such as design codes can help provide a clear basis for making decisions on development proposals. Hastoe feels that this would help prevent land being purchased by developers who then argue that design costs are making the delivery of affordable homes unviable.
- c) emphasise the importance of early pre-application discussions between applicants, authorities and the local community about design and the types of homes to be provided. Our model of community-led housing is set out in our response to question 9 above.

**Question 13**

Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:

- a) make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?;
- b) address the particular scope for higher-density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?;
- c) ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of local housing needs?;
- d) take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in areas with good access to facilities nearby?

**Question 14**

In what types of location would indicative minimum density standards be helpful, and what should those standards be?

We have concerns that point a) (*amending national policy to make clear that plans and individual development proposals should make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?*) if applied in all areas, will lead to unacceptably high densities of homes in rural areas. We are also concerned that, in the rush to build, such homes will be of poorer quality and not be environmentally sustainable – costing more to heat and so leading to fuel poverty for many of their occupants.

We would urge against any sort of minimum density standards in any rural location. We have even experienced a landowner gifting more land for a development, so that its appearance can be improved: this should not be discouraged.

**Question 17**

In taking forward the protection for neighbourhood plans as set out in the Written Ministerial Statement of 12 December 2016 into the revised NPPF, do you agree that it should include the following amendments:

- a) a requirement for the neighbourhood plan to meet its share of local housing need?;
- b) that it is subject to the local planning authority being able to demonstrate through the housing delivery test that, from 2020, delivery has been over 65% (25% in 2018; 45% in 2019) for the wider authority area?
- c) should it remain a requirement to have site allocations in the plan or should the protection apply as long as housing supply policies will meet their share of local housing need?

We agree with a) that the protection for neighbourhood plans should include a requirement for the neighbourhood plan to meet its share of local housing need, but it will entirely depend on how that local housing need has been assessed. It should include, as mentioned above, the households that would qualify for Rural Exception Site developments – ie, living or working in a rural community as a priority.

**Question 18**

What are your views on the merits of introducing a fee for making a planning appeal? We would welcome views on:

- a) how the fee could be designed in such a way that it did not discourage developers, particularly smaller and medium sized firms, from bringing forward legitimate appeals;
- b) the level of the fee and whether it could be refunded in certain circumstances, such as when an appeal is successful; and
- c) whether there could be lower fees for less complex cases.

Hastoe very seldom makes planning appeals, as we work hard with local communities and planning authorities to maximise community acceptance of our proposed developments. That said, we do feel that there should be a fee payable for lodging an appeal – largely to attempt to deter developers from deliberately seeking to game the system by submitting outline planning applications, knowing that they will most likely be rejected and then use the appeal process. We suggest that the fee is based on the gross internal floor area, or number of homes, and it should be refundable in the event that it's successful.

**Question 19**

Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?

We agree with the proposal to amend national policy to expect local planning authorities to have planning policies setting out how high quality digital infrastructure will be delivered in their area.

Hastoe recognises the strides that the Government has made in this vital area and many rural MPs have a keen interest in this. However, the lack of fast broadband is a major issue in many areas, as rural businesses of all sizes need access to it to survive, rural households can't buy goods and services online, job seekers cannot apply for work, people can't access the benefits system and increasingly, rural children cannot study effectively. For understandable economic reasons, broadband providers have proved reluctant to lay cables to more remote areas, but this leaves many rural people the option of a very slow connection, or paying thousands of pounds for a leased line to their community.

5G mobile broadband (as tested in other countries) has the potential to transform rural connectivity, as it could support even faster speeds than fibre-optic broadband. 5G could render the laying of cables to rural communities unnecessary and could be a game-changer for our rural communities. The UK could take the lead in this.

**Question 28**

Do you agree that for the purposes of introducing a housing delivery test, national guidance should make clear that:

- a) The baseline for assessing housing delivery should be a local planning authority's annual housing requirement where this is set out in an up-to-date plan?
- b) The baseline where no local plan is in place should be the published household projections until 2018/19, with the new standard methodology for assessing housing requirements providing the baseline thereafter?
- c) Net annual housing additions should be used to measure housing delivery?
- d) Delivery will be assessed over a rolling three year period, starting with 2014/15 – 2016/17?

## Housing White Paper response from Hastoe

Hastoe feels that any “housing test” must recognise that, in the main, a big increase in the supply of new homes in any given rural area will be very unpopular with the existing community and could affect that community’s cohesion and long-term future. Also, on a practical level, it is unlikely that rural communities will have the ability (in terms of roads and other infrastructure) to support a large influx of new homes).

### Question 29

Do you agree that the consequences for under-delivery should be:

- a) From November 2017, an expectation that local planning authorities prepare an action plan where delivery falls below 95% of the authority’s annual housing requirement?;
- b) From November 2017, a 20% buffer on top of the requirement to maintain a five year housing land supply where delivery falls below 85%?;
- c) From November 2018, application of the presumption in favour of sustainable development where delivery falls below 25%?;
- d) From November 2019, application of the presumption in favour of sustainable development where delivery falls below 45%?; and
- e) From November 2020, application of the presumption in favour of sustainable development where delivery falls below 65%?

Setting delivery targets, with consequences for under-delivery (assuming delivery means the completion and occupation of homes, rather than “starts”), would certainly be a good incentive for local planning authorities and we feel that local authorities should also set a specific target for new homes in rural areas. We are concerned about the possible consequences of this – especially for smaller rural sites for under 10 homes, which may be de-prioritised as the planning authority seeks instead to maximise delivery by focusing on (easier to deliver) larger sites in their urban communities.

### Question 30

What support would be most helpful to local planning authorities in increasing housing delivery in their areas?

Hastoe feels that the best way to increase housing delivery will be for local planning authorities to require genuine community-led development in their areas.

Although many new housing developments are the result of an adversarial process which pits developers against local communities and sometimes the local planning authority, it doesn’t have to be that way. In many rural communities, it is the community itself that recognises the need for more homes (because they want their friends and children to be able to stay living in and contributing to the community). The process starts with the community – it is the community that decides how the homes are to be delivered, either through working in partnership with a housing association or, perhaps by setting up a Community Land Trust (which may work independently or in partnership with a housing association).

This development model has proved to be highly successful in rural communities and is very often promoted by word of mouth. Hastoe has for many years championed and delivered schemes in partnership with local communities. In many cases, Parish Councils have invited Hastoe to build in their village – safe in the knowledge that the homes are needed and will be both attractive and environmentally sustainable. These new homes are viewed by the community as an asset to be proud

## Housing White Paper response from Hastoe

of and one that leaves a lasting legacy for that community. Some villages are now working on their fourth project – another indication of the positive experience.

### Question 31

Do you agree with our proposals to:

- a) amend national policy to revise the definition of affordable housing as set out in Box 4?;
- b) introduce an income cap for starter homes?;
- c) incorporate a definition of affordable private rent housing?;
- d) allow for a transitional period that aligns with other proposals in the White Paper (April 2018)?

We agree with the proposed revised definitions of affordable housing. We like the new 'affordable private rent housing – this will allow rural landowners (a crucial and often overlooked source of new affordable rural homes) to develop and manage their own affordable homes for the community and hope that this application will be promoted.

However, we are concerned that, in rural areas, discounted market housing products can crowd out more traditional forms of affordable housing that have perpetuity arrangements in place, and that social and affordable housing could therefore be allocated less funding by Government.

We would also like an additional definition of affordability – one that is subject to the energy efficiency of the home and is built into the fabric of the building rather than an external rent or benefit regime. For example, independent research conducted into the energy performance of Passivhaus homes (a type of home that Hastoe has years of experience in commissioning and delivering) shows that gas bills for a 3 bed Passivhaus house are just £125 per year, a fraction of the over-£1,000 per year cost for the average 3-bed home. This massive cost reduction is a boon for any occupier but is especially helpful for those in fuel poverty, as these homes can be affordable, even if market rents are charged. In fact if market rents could be charged, more developers would be incentivised to provide highly energy efficient homes.

We agree with the proposal in 31b, that there should be an income cap on Starter Homes, as this would ensure that it remains a policy that can provide homes for people in housing need. The Housing and Planning Act 2016 enables local planning authorities to exclude starter homes from Rural Exception Sites, a point that would be useful to reiterate in future guidance.

### Question 32

Do you agree that:

- a) national planning policy should expect local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products?
- b) that this policy should only apply to developments of over 10 units or 0.5ha?

### Question 33

Should any particular types of residential development be excluded from this policy?

We agree that a) national planning policy should expect local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products.

## Housing White Paper response from Hastoe

However, we strongly disagree with the proposal in b): that the policy should only apply to developments of over 10 units or 0.5ha. As we have explained elsewhere in our response, rural communities need affordable homes for local people to live in – it's the ability for people who work in rural communities and who have close family ties to an area, to continue to live in their community that will ensure the survival of our villages. The affordable element of these small rural sites has provided two thirds of affordable rural housing and will dramatically impact on the already low level of affordable rural housing.

We are delighted to see that the White Paper proposes excepting Rural Exception Sites from this requirement. These sites are often of fewer than 10 homes and if the affordable housing requirement had been removed, then far fewer Rural Exception Sites would come forward for housing development – with catastrophic consequences for rural communities.

However, there seems to be confusion among local planning authorities as to whether small sites must have affordable homes or not. The Federation of Master Builders' "Small is beautiful" report recently asserting that "*National Planning Practice Guidance [a Written Ministerial Statement (WMS) from 2014] now states that affordable housing contributions "should not be sought from developments of 10-units or fewer"*, a letter dated March 2017 from the Planning Inspectorate to Andrea Kitzberger-Smith shows that the true position is far less clear and that authorities do have the power to determine whether the WMS is relevant to them based on their evidence.

Hastoe would like this regrettable confusion cleared-up and for national planning policy to be amended so that Rural Exception Sites and all sites of less than 10 homes in rural areas must include some affordable housing – the proportion to be at the discretion of the local planning authority having taken into account that area's identified housing need.

### Question 35

Do you agree with the proposals to amend national policy to:

- a) Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures?
- b) Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?

We strongly support with the proposals to amend national policy to amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures and severe weather condition such as flooding, as well as to make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change.

Hastoe is a leading builder of energy efficient homes – in particular, homes built to the world-leading Passivhaus standard as well as to AECB Silver standards. Both standards are well beyond that required by current building regulations and result in improved comfort for residents (homes are warmer in winter and cooler in summer) and lower heating bills. A 2-year evaluation by the *University of East Anglia* of Passivhaus homes that we built in Wimbish, Norfolk, showed that average annual gas bills were just 10% of the UK average for similarly-sized homes.

Given the clear benefits for residents, we feel that local planning authorities should be allowed to insist on increased environmental standards when approving new schemes.

**Question 36**

Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?

We agree with proposals to clarify flood risk policy in the National Planning Policy Framework. Every new home should be built with flood resilience in mind – both in terms of its location and flood prevention and mitigation measures. If done at the outset, this does not have to cost more but it does require thought at design stage.