**FORMAL RESPONSE BY TBAG TO GOVERNMENT CONSULTATION ENTITLED**

**‘IMPLEMENTING MEASURES TO IMPROVE BUILD OUT TRANSPARENCY’**

I make this response on behalf of Theydon Bois Action Group (TBAG). Theydon Bois is a village of approximately 1700 households, situated within Epping Forest District, and bounded by Epping Forest and Green Belt farmland.

**The Current Planning Scenario as we see it:-**

The Government seeks to build 1.5 million new homes within the 5 year parliamentary term, which is exactly the same as the previous Government's target of 300,000 new homes a year!  The present Government seems to place the blame on to Local Authority planning departments, saying they are too slow in processing applications and there is too much 'Red Tape' for Developers to go ahead and build new homes.  We see this declared 'view' as being wrong and frankly, nonsensical, as there are already some 1.4 million, extant, approved planning permissions for new homes which have not yet been built out by developers, according to the Institute for Public Policy Research, and others!

So, 1.4 million new homes can already be built out, **starting now** if developers chose to do so and without the need to secure more, unnecessary permissions and thus build primarily on green field, agricultural land which produces food, helps with carbon sequestration and flood alleviation.

Developers game the system by land banking and drip-feeding development on to the market to keep prices high and maximise profits.  They effectively control the rate at which new homes are built out.  It is not Government or Local Authorities who build new homes, but developers who do it as and when it suits them.  Government can stop this by adopting a strict policy of 'Use it *(planning permission*) or Lose it'.  This should be done now.  Furthermore, developers often renege on the amount of approved Affordable Homes, by later citing 'Unviability' and get away with it.  Government policy needs to get teeth and implement legally enforceable policies to stop developers, certainly the large companies, from abusing the system.  Once permission has been granted, the 'contract' must be adhered to.  At the moment, a developer has 3 years to start development without losing the approved planning permission.  All they have to do is dig foundations and do no more until it suits them to maximise their profits.  A completion date should be mandatory.

Developers seem to have great power as 'Lobbyists' to influence Governments of whatever political persuasion.  The Government must recognise in its quest for 1.5 million new homes, that some 1.4 million approved planning permissions for new homes are already out there and adopt measures to put legislative pressure on developers now!  Surely, the backlog of 1.4 million approved permissions must be built out now, before another 1.5 million are allowed to go forward, so continuing the Land Banking problem and allowing developers to game the system for their own personal gain?

Whilst this Technical Consultation seems well meaning in establishing a benchmark of coherent data, it will take time and it will not be retrospective in terms of already approved permissions, as far as any new restrictive *policies or procedures* are concerned.

**Our Group's Responses to some of your Specific Questions:-**

**Q1--Yes,** We agree with your definition of new homes.

**Q3**—**No**, we do not agree with a 50 dwelling threshold for implementation of findings of this consultation.  This number is far too high and changes in procedures and policies would only impact on the large development companies, approximately 6 of them.  It should apply to all submitted planning applications to provide progress reports on when work started, an annual progress report to the LPA etc.  We do not believe that this would be onerous for small developers or LPA's.  Also, if developers do not complete within a reasonable time scale, then they should have any further planning applications declined to be determined by the LPA.  This should apply to all developers and not just to the handful of big boys!

**Q4**—**No,** the proposed 50 threshold should not be higher.  See our answer to question 3.

**Q7**—**Yes,** we are content with information for Commencement Notices.

We thank you for the opportunity afforded by the consultation.

Dr John Warren

Chair

Theydon Bois Action Group