
Reigate and Banstead Development Management Plan Examination

Further Written Statement
submitted on behalf of Gallagher Estates
(ID: 0139)

**Matter 5:
Housing Land Supply and Delivery**

October 2018

Reigate and Banstead Development Management Plan Examination

Response to Inspector's Matters, Issues and Questions

**Matter 5:
Housing Land Supply and Delivery**

**Barton Willmore LLP on behalf of
Gallagher Estates (ID: 0139)**

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INTRODUCTION

- 1.1 Barton Willmore LLP is instructed by Gallagher Estates to submit this further written statement in response to the Inspector's Matters, Issues and Questions. These representations expand upon the representations submitted on behalf of Gallagher Estates at the earlier stages of the preparation of Reigate and Banstead Borough Council's Development Management Plan (DMP).
- 1.2 Gallagher Estates owns the Former Copyhold Works site located to the east of Redhill which is proposed to be allocated through Policy ERM2/3 of the DMP as a Sustainable Urban Extension (SUE).
- 1.3 Our representations submitted in response to the Regulation 19 DMP consultation included a Vision Document which presents our client's development proposals for the site.

RESPONSE TO MATTER 5 – HOUSING LAND SUPPLY AND DELIVERY

Issue: Whether the approach to the provision of housing is justified, positively prepared, effective, deliverable and consistent with national policy and the Core Strategy.

5a) Housing Supply

5.1 Does the DMP provide sufficient housing sites to meet the housing requirements of the borough to 2027? Would there be any oversupply? Does it accord with the spatial distribution set out in the CS?

5.1.1 As we have addressed in our representations and in our statement for Matter 1, the adopted Core Strategy – and therefore, the DMP – does not plan to meet the full identified housing need of the Borough. The unmet need of the Borough has not been resolved with neighbouring authorities with the HMA. This is in conflict with national policy, principally paragraphs 47 and 159 of the NPPF (2012).

5.1.2 The Core Strategy was adopted in July 2014. As such, in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017, from July 2019 the Borough's Development Plan will no longer be 'up-to-date'. The Council's latest Local Development Scheme (June 2018) sets out that a review of the Core Strategy is due to commence in summer 2018 with adoption of a Revised Core Strategy anticipated in winter 2020. The Council's timetable (LDS; June 2018) for preparing the Revised Core Strategy is also considered to be unrealistic, requiring its preparation and submission by spring 2020, given the timescales taken by the Council to adopt the Core Strategy and, subsequently, the DMP.

5.1.3 From July 2019 and until such time as a Revised Core Strategy is adopted, housing supply will, therefore, be considered in the context of the Government's standard method for assessing local housing need.

5.1.4 The Council's anticipated supply is lower than the level of need indicated by the Government's current standard method figure for the Borough. Although this is subject to change at this stage, with the Government having given a strong indication that housing requirements will increase, as evidenced in **Appendices 1 and 2**, it nonetheless demonstrates that housing need in the Borough is significantly greater

than the housing requirement identified in the Core Strategy, and likely to be broadly in line with the level of need identified in the SHMA. Therefore, there is an urgent need for housing, over and above the Core Strategy requirement.

- 5.1.5 On this basis, we recommend that the DMP should seek to maximise provision on available sites in the Borough, thus making a substantial contribution towards meeting identified needs. Such an approach would be consistent with the Core Strategy Inspector's recommendation that:

'All opportunities should be taken to increase housing delivery from the urban areas above that currently envisaged, where consistent with the overall strategy, and to maximise provision from the identified SUEs.' (Core Strategy Inspector's Report; paragraph 69)

- 5.1.6 Furthermore, Policy CS13 in the Core Strategy specifies a minimum level of housing provision required over the plan period. As such, we recommend that the Council should take a more positive approach to tackling identified housing need, responding to the failure to secure a cross-boundary solution to its housing need being met in full, by seeking to bring forward provision to meet its full need.
- 5.1.7 Provision should be maximised with sites brought forward for development at the earliest opportunity to ensure that development needs are met. Currently, we consider the Council's Housing Trajectory is based on unrealistic assumptions with regard to lead-in times, as we address in detail in response to 5.5 below. Consequently, we consider that the anticipated supply is not likely to be delivered within the expected timeframes, with the provision of sufficient housing sites to meet housing requirements, therefore, at risk.
- 5.1.8 As we return to in response to 5.5 and 5.6, the delivery of the anticipated supply is in doubt, with fewer dwellings than expected likely to be delivered on windfall sites and SUEs. Taking this into account, the oversupply identified by the Council, against the Core Strategy requirement, is unlikely to materialise. Therefore, even based on the requirement in the Core Strategy which is considerably lower than identified need, the ability of the Council to maintain sufficient supply is in doubt.
- 5.1.9 Taking this into account, Sustainable Urban Extensions (SUEs), including ERM2/3, should be released for development on adoption of the DMP and brought forward rapidly to meet the housing, and infrastructure, needs of the Borough.

5.1.10 In particular, SUEs within the broad areas of search prioritised in the Core Strategy should be released as a priority. In this regard, ERM2/3, which is located within the East of Redhill and East of Merstham broad area and therefore consistent with the Core Strategy's spatial strategy, should be released on adoption of the DMP.

5.2 Does the DMP provide sufficient choice and flexibility of sites to meet current and future housing needs?

5.2.1 Paragraph 4.10.2 of the Submission DMP (CD1) outlines that the Council has, in accordance with national policy, sought to maximise the delivery of housing within existing urban areas through the use of an 'urban areas first' approach to the spatial strategy. Whilst we support this approach in principle, in our view, sufficient choice will only be provided if sites of varying sizes and natures, i.e. greenfield as well as brownfield land, are released for development. This will enable a range of housing types to be delivered, in a range of locations. In order to achieve this and accounting for lead-in times as discussed above, SUEs will need to be released for development early in the plan period.

5.2.2 If the DMP is to be sufficiently flexible, and able to meet the identified housing need, sufficient supply must be brought forward so that any unexpected delays in delivery do not result in undersupply. As outlined in response to 5.5, we consider that the expected rate of housing delivery is unrealistic. Therefore, additional supply must be brought forward earlier in the plan period to ensure that sufficient flexibility is provided.

5.2.3 Taking the above into account, the release of SUEs at an early stage of the plan period is necessary to ensure that sufficient choice and flexibility is provided, and identified housing needs are met in full. We address this issue in more detail in response to Matter 5b below.

5.3 Does the DMP take sufficient account of previously developed/brownfield land, windfall sites, completions and commitments in its proposed housing provision and has it fully assessed and maximised the use of all reasonable and realistic non Green Belt land?

5.3.1 This is a matter for the Council.

5.4 *Would the DMP realistically provide for a five year housing land supply over the plan period? With reference to Table 14 in the Housing Trajectory Position at 30 June 2018, how have the figures for the annualised over/under delivery and the anticipated shortfall in supply from 2024/25 onwards been derived?*

5.4.1 In our view, the Council's Housing Trajectory Position (at 30th June 2018) (RBBC-DMP-001a) assumes highly ambitious lead-in times and also fails to account for potential unforeseen delays in delivery. The Council's approach is entirely 'geared' towards managing to maintain a sufficient five year supply but restricted to not exceeding it. We consider this approach, coupled with the Council's unrealistic expectations of delivery, are likely to result in a five year housing land supply shortfall, potentially very soon after adoption of the DMP.

5.4.2 As such, we are concerned that the supply will not materialise at the expected rate. There is, therefore, a risk that the Council will not be able to maintain a five year housing land supply throughout the plan period. As we return to in 5b) below, the Council's proposed approach to addressing any shortfall in supply, by triggering the release of SUEs through Policy MLS1, is not justified or effective. Therefore, there is significant risk that an adequate supply of housing will not be maintained throughout the plan period.

5.5 *Is the Housing Trajectory realistic? Are the assumptions with regard to delivery justified by the available evidence?*

5.5.1 No. In our view the delivery trajectory is unrealistic and not justified by the available evidence.

5.5.2 We consider that the Trajectory is particularly unrealistic with regard to the SUEs. It is noted that the Council first expect delivery from SUEs in 2025/26, following the release of the first three SUEs for development in 2024/25. The Council have not provided evidence to demonstrate that this lead-in time is realistic. Instead, the Council's own evidence on average lead-in times, as well as evidence provided by site promoters, demonstrates that this is highly unrealistic.

- 5.5.3 For example, NWH1 is anticipated to yield 15 units, of a total of 75, in 2025/26 following release for development in 2024/25. On this basis, the Council is expecting a planning application to be prepared, submitted and decided, conditions to be discharged, development to commence and the first 15 units to be delivered, all within a 12 month period.
- 5.5.4 We consider that this is unrealistic and is inconsistent with Table 12 of RBBC-DMP-001a which identifies that for sites with 51-100 net units there is, on average, a time lag of 231 days between the grant of permission and commencement of development. This would be in addition to the time between submission and determination of a planning application as well as the time to prepare an application. As such, we consider it is highly likely that the Council's delivery expectations will not be met.
- 5.5.5 Similarly, the Council, in our view unrealistically, assume that 30 completions will be achieved in 2026/27 on ERM1 following the release of the site for development in 2025/26. Based on the site promoter's indication that a planning application could be submitted within one year of the release of the site, and given the likely timescales for determination and the time lag between the grant of permission and commencement of development, the Council's anticipated delivery expectations for this site are also highly unlikely to be met.
- 5.5.6 Furthermore, the anticipated delivery contradicts that outlined by the site promoters, as set out in Table 16 of RBBC-DMP-001a. It is stated that the site promoters have indicated that '*planning permission could be submitted within 6 months; further 9 months for obtaining planning permission and discharging conditions*' and that '*development commence on site within 1.5-3 years and completed within 3-4 years of the site being released for development*'. On this basis, first completions are not likely until at least 15 months after the release of the site, i.e. during 2026/27 if the site was released in 2024/25.
- 5.5.7 Notably, while the Council has underestimated delivery timescales for SUEs which are proposed for early release, expected delivery rates for other SUEs are misrepresented in Table 16 giving an overly negative indication of delivery timescales. For example, Table 16 states that for ERM2/3 '*Gallagher Estates anticipate a lead-in time of 3 years between achieving outline planning consent and first delivery*'. This is incorrect and does not reflect paragraph of 3.23 of the Regulation 19 representations submitted on behalf of Gallagher Estates which states that '*it is anticipated that approximately 3 years will be required from the point of submitting an outline planning application to first housing completions being achieved on the site*'.

5.6 *How are windfall sites defined? Is the windfall allowance included in the supply trajectory appropriate having regard to the historic rate of windfall delivery in the borough? Should windfalls be included in the first 2 years of the supply calculation?*

5.6.1 The Council identify that windfalls '*normally comprise of sites that have unexpectedly become available for a residential use*' (CD1; Annex 1). We consider that the majority of sites yielding units during, as a minimum, the first two years of the plan period will already be identified in the Housing Trajectory as sites with planning permission. As such, these sites are already included within the anticipated and will not '*unexpectedly become available*'.

5.6.2 The inclusion of a windfall allowance in the early part of the Housing Trajectory, therefore, leads to double counting of supply and the artificial inflation of anticipated housing delivery rates.

5.6.3 The Core Strategy Inspector's Report echoes this, stating that:

**'The yield from windfalls in the first year or two of the plan period will come mostly from sites with planning permission (which are part of the identified supply) rather than from as yet unidentified windfall sites'.
(IR; paragraph 37)**

5.6.4 On this basis, the Inspector comments that it is 'doubtful' whether the full annual windfall allowance would be delivered (Paragraph 37). We consider that the delivery of the full windfall allowance for at least the first year or two of the DMP plan period is also 'doubtful'.

5.6.5 We, therefore, recommend that the Housing Trajectory is amended to remove the proposed windfall allowance for, as a minimum, 2018/19 and 2019/20.

5.7 *How have site densities been determined? Are they reasonably accurate? How does the DMP set out the Councils approach to housing density to reflect local circumstances? Is there a need for separate policy guidance on density?*

5.7.1 No comments.

5.8 *The Council does not apply a non-implementation rate. Based on the available evidence is one appropriate and if so at what level should it be set?*

5.8.1 The Council indicate that the lack of a non-implementation rate is justified on the basis that '*sites which have a history of non-implementation and sites which are not considered to come forward for development*' (RBBC-DMP-001a; paragraph 3.11) have been 'taken out' of the trajectory. However, unexpected delays cannot be predicted, and a non-implementation rate is, therefore, necessary to account for such events. As such, we consider that the Council should apply a non-implementation rate.

5.8.2 Based on our knowledge of non-implementation rates applied elsewhere, we consider that a 10% discount to anticipated delivery should be applied.

5.9 *Is the Strategic Housing Market Assessment (SHMA) sufficiently up to date to provide an appropriate robust evidence base?*

5.9.1 As set out in paragraph 4.1 of our Regulation 19 representations, the overall level of growth in the Core Strategy and DMP is not supported by an up-to-date SHMA.

5b) Delivery

Policy MLS1 – Phasing of sustainable urban extension sites

5.10 *What evidence is there that this policy is effective, justified and consistent with national policy?*

5.10.1 No evidence has been published by the Council which demonstrates that Policy MLS1 is effective or justified. An assertion has been made that such an approach is needed to avoid conflict with the Council's prioritisation of new development in existing urban areas. However, this does not appear to be based on any evidence and the Council itself has identified that development on non-previously developed land is necessary for sufficient housing to be provided. As such, the decision to depart from the Core Strategy Inspector's recommendation to '*maximise provision from the identified SUEs*' (IR; paragraph 69) has not been justified.

5.10.2 Furthermore, the policy cannot be consistent with national policy as a result of its restrictive approach to the release of the sites. Such an approach conflicts with the national priority of significantly boosting the supply of housing and is not positively prepared.

5.10.3 Taking account of the above, there is no justification for constraining the delivery of housing in the Borough, restricting the delivery of the SUEs. Policy MLS1 is, therefore, unsound.

5.11 How has the order in which sites should come forward been decided? What factors were taken into account?

5.11.1 The Council's 'Sustainable Urban Extensions – Phasing' report (SD45) identifies that non-Green Belt SUEs have been prioritised for release with the phasing of Green Belt SUEs a product of sustainability and Green Belt Review considerations. We support this approach and the conclusion in paragraph 4.8 of the report that, on this basis, ERM2 and ERM3 are the sites which should be prioritised for release for development. Therefore, based on their sustainability credentials, ERM2/3 should be prioritised in any phased release of the SUEs.

5.11.2 We object to the conclusion in paragraph 4.12 that ERM2/3 should be linked to '*an extended timescale dependent on ensuring the landfill sites operation is not compromised*'. This conclusion is unsubstantiated with no evidence produced by the Council demonstrating that development at ERM2/3 would compromise the effective operation of the Patteson Court Landfill.

5.11.3 Furthermore, the suite of technical reports submitted on behalf of Gallagher Estates as part of our Regulation 19 representations demonstrates that development would not compromise the operation of the landfill. This evidence has not been challenged by the Council, Biffa or Surrey County Council as the waste authority.

5.11.4 Taking account of the above, the phasing of ERM2/3 beyond 2027, after all other SUEs, is unsound. The site is identified as being the highest priority for release in Step 2 of the Council's Phasing report. The Council's decision that its release should be delayed due to its proximity to the landfill is unsubstantiated (as we address in our written statement for Matter 9).

5.12 With particular reference to part 4 of the Policy, what evidence is there that this is justified? Is it too restrictive? How does this take account of the lead in times for these sites and the need to maintain a 5 year housing land supply?

5.12.1 Policy MLS1 indicates that the Council's annual monitoring process will be used to determine when SUEs will be released for development with sites released when a five year housing land supply shortfall is identified through the Council's annual monitoring process. The SUE Phasing report (SD45) reiterates this, outlining that:

'Only those sites necessary to cover the shortfall in five year supply would be released at any one time.'
(paragraph 5.1)

5.12.2 In our view, such a restrictive approach limiting the delivery of housing to only just meeting the Core Strategy residual housing requirement is unsound. This ignores the fact that the Core Strategy housing requirement is a minimum; that the Core Strategy housing requirement is significantly below identified need for housing; the Core Strategy Inspector's recommendation to maximise provision; and our concern that the Council will continue to undertake an unrealistic assessment of a deliverable housing land supply.

5.12.3 Furthermore, in light of the difficulties of accurately forecasting delivery, and therefore associated shortfalls which may arise, we consider the Council's negative and severely restrictive approach as set out in the SUE Phasing report reinforces our objections to Policy MLS1.

5.12.4 The release of SUE sites coming forward in an order other than that proposed is supported in principle, albeit as explained above any managed release of SUEs is considered unsound. However, part 4 of Policy MLS1 places an unjustified and overly restrictive burden on applicants to demonstrate that higher priority sites are not deliverable. In our view, this approach will prevent sufficient housing land supply being maintained and prevent infrastructure from being delivered.

5.13 Is the policy sufficiently flexible? Is it clear how this policy will be implemented?

5.13.1 No. Policy MLS1 appears to rely on landowners/developers, on the basis of the Council's predicted future housing land supply deficit, preparing a planning application in advance of a site's release. The Council confirm this within RBBC-DMP-001a, stating that:

'Landowners/developers/promoters will be aware through the annual monitoring process of the condition of the 5 Year Land Supply position and will therefore be able to an extent prepare a planning application prior to the "release" of the site.'
(paragraph 3.28)

5.13.2 This approach relies on developers preparing and submitting planning applications prior to the Council determining that there is a shortfall in supply.

5.13.3 As outlined above, we question whether the Council, or developers, will be able to accurately determine the scale of a future shortfall, given the unpredictable nature of housing land supply. Developers are, therefore, at significant risk of applications being refused as a result of the anticipated shortfall which triggered their preparation not materialising. This risk is in addition to the risk of an application being refused on other grounds.

5.13.4 Based on our experience, applicants may not be willing to progress potentially abortive work and may instead wait for confirmation that a site is released before progressing technical work. Consequently, there is a risk that applicants will not begin preparing planning applications – at significant cost – until such time as the release of their site for development is confirmed by the Council. SUEs will, therefore, need to be released at an early stage in order to ensure that housing is delivered within the plan period, taking account of the likely time for planning applications to be prepared, submitted and determined and the timescales for building out sites.

5.13.5 Notwithstanding our in principle objection to Policy MLS1, we recommend that, if sites are to be released on a phased basis, the policy needs to specify that SUEs will be formally "released" through a committee resolution. This is necessary to ensure that certainty is provided for developers that applications will not be refused on land supply grounds.

APPENDIX 1



Ministry of Housing,
Communities &
Local Government

Government response to the draft revised National Planning Policy Framework consultation

A summary of consultation responses and the Government's
view on the way forward

Question 14

Do you have any other comments on the text of Chapter 5?

Question 14 response

There were 1,102 responses to this open question. Points raised include:

- Local authorities and interest groups raised concerns about how changes to policy will affect the delivery of affordable housing.
- Private sector organisations and local authorities called for further clarity and guidance on local housing need and five year housing land supply.
- The omission of a reference to Garden City principles was a concern among many interest groups, private sector organisations and local authorities.
- There were calls for a stronger policy approach to accessible housing for older and disabled people.
- Although there was support for local planning authorities to provide housing requirement figures to designated neighbourhood plan areas, respondents raised concerns about the burden of additional work and consistency in approach to providing these figures and requested more guidance.
- All groups of respondents highlighted the need for more clarity in the rural housing section.

Government response

The Government welcomes the range of respondents' comments on Chapter 5. We have amended the text to ensure that the policy intent is as clear as possible across the chapter, including on affordable and rural housing, and will be publishing updated guidance on five year housing land supply, local housing need and housing for older and disabled people. We have strengthened the policy approach to accessible housing through a change to Chapter 12 (see response to question 29). We have also specifically referenced social rent in the definition of affordable housing in the glossary.

The Government notes the support for the reinstatement of the Garden City principles. The Government remains committed to these and has included a reference in the final Framework, as part of expanded text on planning for larger scale developments in which we also set out policy on high-level locational principles and aligning development with infrastructure. We have retained the proposal to create increased certainty in planning for housing needs in neighbourhood plan areas, which was widely welcomed in the consultation. We will also be publishing updated national planning guidance so that plan-makers can more easily understand how housing requirement figures can be determined for the neighbourhood level.

A number of responses to this question provided comment on the proposed local housing need method. The Government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically it is

noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September.

In the housing White Paper the Government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September. We will consult on the specific details of any change at that time. It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in *Planning for the right homes in the right places* consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid 2020's.

APPENDIX 2

Interview: Kit Malthouse, housing and planning minister

4 October 2018 by John Geoghegan

The housing and planning minister speaks exclusively to Planning about housing need, developer contributions and plans for the Oxford-to-Cambridge corridor.



Housing minister Kit Malthouse

Housing ministers do not tend to stay in the job for long. In July 2018, when Kit Malthouse took on the role, he became the third in the past year and the 18th in 20 years. The MP for North West Hampshire is aware that his most recent predecessors have had a particularly short shelf-life - Dominic Raab was only in the post for six months and his predecessor, Alok Sharma, for seven.

"Hopefully, I will last longer than that," says Malthouse. "I've been given orders to do as much as I can as fast as I can. That's what I'm going to concentrate on." Asked how he would measure success in the role, Malthouse answers: "That's easy. It's all about numbers. My mantra is: more, better, faster. For me, success would mean that, either now or certainly in the future, I've laid the foundations for increased delivery."

In the course of a wide-ranging interview, the minister says that:

- the combination of the new household projections and the standard method of assessing housing need has produced "crazy" results
- the ministry aims to consult on a revised standard method before Christmas, and "certainly before January 24"
- the government will respond to responses on its consultation on the future for developer contributions by Christmas

Malthouse took over the job at a key time. The final version of the revised National Planning Policy Framework (NPPF) was published just weeks after his appointment. At the same time, the government announced that it was considering reviewing the NPPF's new standard method of assessing housing need in light of the then forthcoming (now published) Office for National Statistics (ONS) household projections, to ensure that progress towards its 300,000-homes-a-year target was not impeded. The projections show a 24 per cent drop in household formation compared to the previous figures, resulting in dramatic falls in housing need in many areas. Unsurprisingly, many in the sector are keen for the government to clarify its future plans for the standard method as soon as possible.

Malthouse says: "We are obviously digesting what the ONS has produced. Everyone was a bit taken by surprise by the numbers and want to understand what the implications are. There have been some really anomalous results from it - some very strong growth areas which have come out with a zero housing need. That's just crazy."

Malthouse says he has "concerns" about the new projections' implications for housing need figures. He says: "A problem with these projections is they don't recognise pent-up demand. As a country, we haven't been building enough housing for decades." The ONS has based its projections on past trends from a "period of particularly low household growth", he says, which might put "an artificial constraint" on future expansion. He adds: "Household growth can only happen if accommodation is available, and during that period we are not convinced it was."

The minister would not be drawn on any additional factors his department is considering adding to the standard method. He says: "I've been given seven or eight options to think about and I've posed a few options myself to the team." But he drops a hint on possible considerations: "We are having a look at what other information there might be during that period - such as growth in household density - to see what the indicators might be for need in the future." He goes on to say: "It may be that we have to add other dimensions to the targets, such as growth in the number of people per household. Is that indicating something about suppressed demand?"

While Malthouse insists the ministry wants to provide clarity as soon as possible, he suggests a timescale for the draft proposals that some in the sector will see as disappointingly long. He says: "We recognise that the whole sector, councils included, need clarity pretty quickly. We will come out as soon as we can with some sort of consultation." He adds: "It would be great to get it sorted out this side of Christmas and certainly before January 24".

After this date, the government expects plans submitted for examination to have applied the standard method to their need assessment. The fact that Malthouse is also treating this date as the final deadline for the ministry to publish draft revisions to the standard method suggests that finalised revisions will not be ready until significantly later. This implies that, unless the MHCLG pushes back the 24 January deadline for application of the standard method to local plans, councils will from that date initially be required to apply a need assessment method that the minister has said is generating "crazy" results. Following the interview, we asked the MHCLG to confirm that the existing version of the standard method would be applied after January 24, rather than the draft revised version. It said that it would, although it also raised the prospect of transitional arrangements between the two versions of the method. The ministry said that its consultation on the revised standard method "will include details of when we expect the revised method to take effect and any transitional arrangements".

Given the drop in the household projections, the government is bound to face questions over whether it should stick to its target of delivering 300,000 new homes a year "by the mid-2020s". Asked if the goal was still appropriate, Malthouse says: "My personal view is that, if we take into account this idea of pent-up demand and the change in household demographics, and you couple that with the affordability issue, then there's no doubt that we need to build a hell of a lot more houses. Even if we were to overshoot some sort of revised target, there's

still a strong case to say we should do that purely on affordability grounds. We have to make up for 20 years' worth of under-supply. The target has to bear that in mind too."

Alongside potential revisions to the standard method, another government action that is eagerly awaited by the planning sector is its response to a consultation earlier in the year on revising the system by which the contributions made by developers to local infrastructure costs are made. It had proposed changes to the community infrastructure levy (CIL) and section 106 payments, as well as allowing combined authorities to levy a "strategic infrastructure tariff" (SIT), similar to the London mayoral CIL that provides funding towards Crossrail.

Reiterating comments he made last month at a session of the House of Commons housing, communities and local government committee's investigation into land value capture, Malthouse says the government is "chewing on" the consultation responses. He said: "My guess is we will come to you before Christmas. It may be that some of the stuff is announced at the Budget. But comprehensively, definitely by Christmas."

Malthouse says the government is still looking at ways of more effectively capturing increases in land value generated by planning permissions. Next steps may be influenced by "issues" emerging from Sir Oliver Letwin's review of the rate at which planning permissions are built out, which is due before the Autumn Budget, itself due on 29 October. "As I've said before, the art of land value capture is to pluck the goose with a minimum of hissing and what we don't want to do is to choke off activity," he says. "But I think everybody recognises the need to contribute towards the significant infrastructure payments that are going to be required, particularly for some of these large-scale developments."

On the issue of large-scale developments, one of the the ministry's key projects is promoting new settlements in the Oxford-to-Cambridge corridor. In last year's Autumn Budget, the chancellor Philip Hammond declared that the government wanted to see one million new homes in the arc by 2050. To this end, in July, Malthouse wrote to council leaders in the area asking for initial expressions of interest in promoting new settlements. The deadline was 14 September, and the week after the interview Malthouse told Conservative Party conference delegates that the MHCLG had received "something like" 14 expressions of interest. During our conversation, Malthouse says that the ministry is happy with the reaction.

Most of the proposals are not new, he concedes, but "have been in the ether and need something to unlock them". Some of them are even underway already, he adds, citing the expansion of Milton Keynes, while others are long-held proposals, like Bicester's plans to complete its ring road around the town to spur new housing development.

Now it has received some interest, the government plans to "configure" the nominating authorities into "coherent" groupings with which to negotiate infrastructure funding deals "along the lines of the Oxfordshire model", he says. This saw the government, earlier this year, agree a deal with the county's authorities in which the councils agreed to plan for 100,000 new homes in return for £250 million of infrastructure investment. Ultimately, Malthouse says the government wants to draw up similar housing deals with authorities "along the whole corridor right the way through to Cambridge". "Fundamentally, that's how we are going to make these things happen," he says. He says the government is in "active conversation" on new housing deals, and hopes to announce some more "before Christmas".

One of the key planning initiatives launched under previous communities secretary Sajid Javid was the programme of local plan intervention. Under this initiative, councils found by MHCLG to have inadequate justification for delays in local plan-making were threatened with having their strategies prepared by the government instead. In

March, the ministry sent a team in to three councils - Wirral in Merseyside, Thanet in Kent and Castle Point in Essex - to scrutinise their local plan processes. But since then, there's been little news from Whitehall.

Malthouse says the government has not yet decided what to do next: "We are considering the options and discussing them with the locally-elected representatives in each of those three cases," he says. Malthouse says 24 January is a deadline for further action. How effective does Malthouse think such sanctions have been in improving planning performance? "We hope it sharpens people's minds," he says. "We hope that the carrot of being in control of your planning will be enough. If, in certain circumstances, a stick is required, then hopefully that will push people over the line."

However, it is not just council performance that is under the microscope. A gripe among many developers, and some council planners, is the time it can take the government and its agencies, such as the Planning Inspectorate, to make planning decisions. This is particularly so when local authorities have been put under pressure to make decisions and prepare plans in a timely way.

All communities secretaries have struggled to meet the three-month statutory deadline for the determination of ministerial decisions announced by then-chancellor George Osborne in March 2016. A quarter of such decisions missed the deadline last year, according to government figures. Meanwhile, despite improving its performance in 2017/18, PINS still missed six of its nine headline targets for deciding application and enforcement appeals.

Malthouse says: "I'm looking at the data about what's happening. Obviously, we want to get things done as quickly as we possibly can and we don't want to be an unnecessarily constraint. But some of these planning decisions that come up to the secretary of state are so strategic that you do need to look at every nook and cranny because it will have an impact over the generations. I don't necessarily apologise for that."

Kit Malthouse political CV

1998: Elected as a member of Westminster City Council, serving as Conservative group chief whip, chairman of social services, deputy leader and cabinet member for finance before standing down in 2006.

2008: Elected as London Assembly member for the West Central seat, serving as Boris Johnson's deputy mayor for policing and vice-chairman of the Metropolitan Police Authority.

2012: Re-elected to London Assembly, serving as Johnson's deputy mayor for business and enterprise.

2015: Elected MP for North West Hampshire with a 58 per cent share of the vote, taking over from former planning minister Sir George Young.

2017: Re-elected as MP on a 62 per cent share of the poll.

January 2018: Appointed parliamentary under-secretary at the Department for Work and Pensions with responsibilities including financial support for housing.

July 2018: Appointed housing and planning minister, including responsibility for planning policy, casework oversight and supporting the secretary state on housing supply and policy and delivery.