

HOUSING WHITE PAPER

CONSULTATION RESPONSE

29th April 2017

About WElink

WElink Group is an international provider of renewable energy and low-carbon construction solutions. Founded in 2007, WElink's roots are in renewable energy with extensive experience of solar project development around the world. WElink of today has evolved into a leading innovator, developer, financial aggregator, and facilities manager of modern, energy efficient modular construction working in collaborations with the world's leading building materials company, China National Buildings Material (CNBM). We've combined our success in renewable energy to create modern building structures and community dwellings which are not only low-carbon and efficient in their construction but low-carbon and efficient in their application and operation.

Our construction expertise combines energy efficient materials, modular construction methods, and renewable energy in a range of building structures and applications including: residential living (social, affordable and private), commercial development, student accommodation, and community and care amenities.

WElink currently operates in the UK, Europe, South America, and Asia.

£2.5bn modular housing deal

Our most recent significant announcement was the £2.5bn deal with northern based housing association, Your Housing Group, to deliver 25,000 low carbon modular homes by 2022 in the north west of England. We also announced plans to build six modular housing factories and explore partnerships with housing associations, local authorities, or with Government bodies with a view to delivering 25,000 low carbon modular homes per year by 2022.

Our homes will:

- Be constructed using British produced steel frames
- Use modern low carbon panelling
- Be built at scale in factories to encourage significant cost reductions
- 75% energy independent with standard renewable and energy efficiency built in
- Create localised, dynamic supply chains and new employment opportunities.

The delivery of this revolutionary partnership and others we are seeking is being underpinned by private sector financial investment which means, whilst the UK Government has committed to supporting an increase in house building, it is not dependent on being financially incentivised by the UK Government.

International Trade Minister, Greg Hands MP, said of the deal:

“This is a clear endorsement of the UK’s attractiveness as a place for inward investment. This announcement has the potential to benefit local communities across the country, creating jobs, boosting local economies and creating homes.

“The Department for International Trade has worked closely with the consortium to highlight the strengths of the UK and played a fundamental role in bringing together the partners in this exciting joint venture.”

CNBM’s Chairman Peng remarked:

‘CNBM is the world’s leading construction materials company and with CTIEC have in house a Fortune 200 Engineering group whose approach is to work with local providers and draw upon local expertise for our projects around the world. We are delighted to continue our investment in the UK through innovative housing design and construction methods which we see as world leading.

However, the key to unlocking the opportunities to address the housing needs of the UK is through the development and delivery of an industrialisation strategy at significant scale. To this end, CNBM is also committing to six factories across the UK to deliver modern housing agreed in this deal on a national level.’

Consultation Answers

Question 1

(Paragraph 156. Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: ● the homes and jobs needed in the area; ● the provision of retail, leisure and other commercial development; ● the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); ● the provision of health, security, community and cultural infrastructure and other local facilities; and ● climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.)

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?

Answer 1

1a - Agree

1b – Agree –does this need to be unanimous agreement of combined authorities – can it not just be majority approval – will unanimous allow special interest groups undue influence

1c – Agree

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?

Answer 2

Local Plans should link together and avoid one competing against the other which causes conflict and unnecessary delay. High level summary plans could be produced in advance to allow key aspects to be considered and amended before detailed plans submitted – this should not however impact on total plan production time. WELink's view is keep it simple and straightforward.

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?

Answer 3

3a – We agree with this which can help developers understand local need and what the local authorities plans / policies are to address them. It will, however, need to reflect the forecast local demographic to be relevant. Needs to be careful not be at the expense of sustainable mix communities. Applied appropriately it will increase chances of the right type and amount of development for local need.

3b – We strongly agree with this as consistency will save time and efficiency and support greater development to get built.

Question 4

(Foot note 9 of the National Planning Policy Framework: For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of

Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion)

Do you agree with the proposals to amend the presumption in favour of sustainable development so that:

a) authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?;

b) it makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?;

c) the list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the National Planning Policy Framework (so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?

d) its considerations are re-ordered and numbered, the opening text is simplified and specific references to local plans are removed?

Answer 4

4a – We strongly agree with this proposals as it will help the delivery of appropriate developments and will make best use of land available.

4b – We agree with this unless there are VERY strong reasons against.

4c – We agree that this should be the case.

4d – We strongly agree.

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?

Answer 5

We do agree, as long as the reasons for disposing at below fair value are explicit, we also believe they should include ways of selling land with consent as part of a joint venture and linking the sale to ensure Developers commitments are achieved.

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)?

Answer 6

Pooling may allow a more comprehensive development to be undertaken and allow local authorities access to private sector development skills and funding. Local authorities ownership and statutory powers can also be used to speed up and unlock development opportunities. Adjacent land / local plans should read as one, thus avoiding potential conflict.

Question 7

Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard?

Answer 7

We strongly agree and add that the Merton rule should be used and crucially enforced. (*The Merton Rule, named after the council that in 2003 adopted the first prescriptive planning policy, requires new commercial buildings over 1,000 square meters to generate at least 10% of their energy needs using on site renewable energy equipment.*)

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?; and

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?

Answers 8

8a – We agree - small sites should be a priority to avoid neglected waste land.

8b – We agree.

8c – We agree.

8d – We agree.

8e – We agree and add that there should be measures in place that encourage developers not to land bank sites in order to artificially inflate house prices.

8f – We agree and add that more flexibility is required to move sites faster.

Question 9

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

Answer 9

Streamlined planning helps to create certainty early in the development process, linking this to early infrastructure provisions gives confidence to the private sector to invest. The streamlining process should be linked to levels of development completions and scale of delivery. On a specific topic, we believe this can be achieved through the use of criteria where life cycles of houses are taken into account both in terms of quality and energy efficiency. Passive house insulation standards should be applied to 2 and 3 storey housing along with triple glazing to ensure heat loads are kept to a minimum. Also heating systems should take account of the fact that houses are likely to be in position for 100 years + and present gas supplies likely to run low half way through this century. We believe that renewables should be written into Planning rules

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?

Answer 10

10a – We agree, however, areas of Green Belt that have previously been industry sites should be brought back into use for housing.

10b – We believe that a specification for energy efficiency and renewables could be used as ‘compensation’ for building on Green Belt. Access should also be maintained to other green belt.

10c – We agree especially as ‘green’ burials are becoming increasingly popular.

10d – We agree.

10e – We agree, but more powers may be needed if poor quality objections are raised.

10f - We strongly agree with this as much of the Green Belt especially on the peripheries of large towns and cities are former industrial sites such as railway yards, factories etc.

Question 11

Are there particular options for accommodating development that national policy should expect authorities to have explored fully before Green Belt boundaries are amended, in addition to the ones set out above?

Answer 11

None

Question 12

Do you 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?;

b) make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) are expected to 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?;

c) emphasise the importance of early preapplication discussions between applicants, authorities and the local community about design and the types of homes to be provided?;

d) makes clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in statutory plans?; and

e) recognise the value of using a widely-accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be reflected in plans and given weight in the planning process?

Answer 12

12a – Yes, we agree but timelines should be set and adhered to.

12b – Yes, we agree as clarity will help to ensure an efficient process and prevent expensive abortive work .

12c – We agree - standard house types appropriate for the area should be developed early in the planning process/application. External cladding and features should remain in keeping with the local area.

12d – We agree. Developers will spend much time and expense developing designs appropriate to standards that are set. If these are then objected to at planning the process, the rationale for setting out clear design expectations would have failed its purpose.

12e – We agree - Internals of houses are pretty standard in size and layout, how it fits in the area is what makes developments attractive. Facade and roof profiles together with materials should be appropriately selected.

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?

Answers 13

13a – We agree and is most acute in urban areas with high land values.

13b – We agree, but public transport and infrastructure needs to be grown and improved in tandem to prevent these areas becoming a problem location in the future.

13c – We strongly agree.

13d – We agree.

Question 14

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

Answer 14

In areas where public transport and amenities can support a growing population, this is often in areas where land values are high and there is a need for affordable housing.

Question 15

What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can best be supported through planning (using tools such as policy, local development orders, and permitted development rights)?

Answer 15

There are clear opportunities within many public-sector sites for intensification of development and the inclusion of more housing. Priority should be given to achieving this although not to the detriment of public services. Redundant public sector sites, and not restricted to urban locations, should be brought to the market whilst sites to be built or existing uses should be assessed to determine whether measures to increase density of use are practical and economic. Suitable designs and selection of appropriate materials are key to making sensible use of land and creating new areas where people want to live. Local Development Orders and permitted development rights should be used where appropriate.

Question 16

Do you agree that:

- a) where local planning authorities wish to agree their housing land supply for a one-year period, national policy should require those authorities to maintain a 10% buffer on their 5 year housing land supply?;
- b) the Planning Inspectorate should consider and agree an authority's assessment of its housing supply for the purpose of this policy?
- c) if so, should the Inspectorate's consideration focus on whether the approach pursued by the authority in establishing the land supply position is robust, or should the Inspectorate make an assessment of the supply figure?

Answer 16

16a - This approach is restrictive and does not allow good planning or getting the most from the sites. Long term planning and use of land is required.

16b - Clear rules should be set up to allow easy self-assessment and avoid the need for a Planning Inspectorate to be called in which only adds another layer to the system and could add to delays for developments.

16c - Better for rules to be set out clearly and for the Inspectorate to focus on establishing that land supply position is robust.

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?

Answer 17

17a – We agree.



17b – We agree, it is simple to follow rules and guidance of this nature.

17c – Allocations in the plan should focus on meeting the local housing need.

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.

Answer 18

18a - A fee should be set at an appropriate level along with clear rules so ensure appeals are minimised. Some Planners and planning committees may need additional guidance and support to ensure appeals are seen as a last resort rather than a delaying or infringement tactic which some developers believe they have experienced in the past.

18b – We believe if an appeal is successful then the whole fee should be returned.

18c - Yes fees should be set at appropriate levels, but again clear rules would minimise the use of appeals.

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?

Answer 19

We strongly agree, digital infrastructure should be provided as part of the development and required by Planning.

Question 20

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

a) the status of endorsed recommendations of the National Infrastructure Commission is made clear?
and

b) authorities are expected to identify the additional development opportunities which strategic infrastructure improvements offer for making additional land available for housing?

Answer 20

20a – We agree.

20b – We agree.

Question 21

Do you agree that:

a) the planning application form should be amended to include a request for the estimated start date and build out rate for proposals for housing?

b) that developers should be required to provide local authorities with basic information (in terms of actual and projected build out) on progress in delivering the permitted number of homes, after planning permission has been granted?

c) the basic information (above) should be published as part of Authority Monitoring Reports?

d) that large housebuilders should be required to provide aggregate information on build out rates?

Answer 21

21a - Yes and an expected completion time should also be included to encourage developments that are successful in planning to go ahead.

21b - No, planning permission should include a build out program and planning should be rescinded or the local authority can invoke compulsory purchase after an agreed period.

21c - Yes and fully monitored and enforced.


21d – We agree, build out rates should apply to all Planning Applications.

Question 22

Do you agree that the realistic prospect that housing will be built on a site should be taken into account in the determination of planning applications for housing on sites where there is evidence of non-implementation of earlier permissions for housing development?

Answer 22

We strongly agree to prevent land banking in order to force up house prices.



Question 23

We would welcome views on whether an applicant's track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development.

Answer 23

We strongly agree, particularly where developers apply to change the housing mix after they have started the development. The difficulty will come when house building is done by individual SPV's, none the less it would be a useful tool to monitor the large house builders who provide the bulk of the housing supply,

Question 24

If this proposal were taken forward, do you agree that the track record of an applicant should only be taken into account when considering proposals for large scale sites, so as not to deter new entrants to the market?

Answer 24

Yes, track record should account for large schemes.

Question 25

What are your views on whether local authorities should be encouraged to shorten the timescales for developers to implement a permission for housing development from three years to two years, except where a shorter timescale could hinder the viability or deliverability of a scheme? We would particularly welcome views on what such a change would mean for SME developers.

Answer 25

We support shortening the timescales for developers to implement planning permission and would advocate a full build program to be submitted as part of the Planning Application, variations to the build plan should only be allowed as a result of unforeseen problems e.g poor ground conditions, site services, prolonged poor weather conditions.

Question 26

Do you agree with the proposals to amend legislation to simplify and speed up the process of serving a completion notice by removing the requirement for the Secretary of State to confirm a completion notice before it can take effect?

Answer 26

We strongly agree – the process needs to be speeded up and by removing the need for the secretary of state to confirm a completion notice will help to get housing complete..

Question 27

What are your views on whether we should allow local authorities to serve a completion notice on a site before the commencement deadline has elapsed, but only where works have begun? What impact do you think this will have on lenders' willingness to lend to developers?

Answer 27

We agree, developers should keep to program and allowing completion notices to be sent after a start has been made but before the commencement deadline has expired will help to stop token starts. Lenders may be nervous about being forced to lend when market values may not justify commencement of development. Lenders are however used to having non utilisation provisions in loan documentation so should understand similar provisions being included for commencement of development

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?

Answer 28

28a – agree – but Local authorities should be obliged to keep plans up to date

28b – agree although as stated above Local authorities should be obliged to maintain its annual housing requirement up to date

28c - Yes, and should be easily predicted based on Planning Permissions. No more land banks as its distorting market prices and housing delivery.

28d – Agree, it is reasonable to use a rolling three year program to mitigate peaks and troughs.

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%?

Answer 29

29a – We agree and must be enforced.

29b – Agreed

29c – Agreed

29d - Agreed

29e - Agreed

Question 30

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

Answer 30

Increase local authorities planning resource capability and set out clear and unambiguous targets for delivery of planning consents, housing plans, targets etc. Delays and uncertainties cause development problems that end up incurring significant and unnecessary costs.

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)?

Answer 31

31a - Yes

31b – Agree – may be appropriate to look at more regional variations in income cap levels.

31c – We agree.

31d – We agree.

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?

Answer 32

32a – No, it should be dependant on need in the the area.

32b - Suggest any more than 3, 10 is too large a threshold.

Question 33

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

Answer 33

No

Question 34

Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18-219 of the National Planning Policy Framework, together constitute the Government's view of what sustainable development means for the planning system in England?

Answer 34

Agree

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?

Answer 35

35a – Agree, climate change cannot be ignored and could adversely impact on households including insurances later on in the homes’ lifespan.

35b – Agree but needs to be research and consensus based.

Question 36

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

Answer 36

We agree.

Question 37

Do you agree with the proposal to amend national policy to emphasise that planning policies and decisions should take account of existing businesses when locating new development nearby and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development?

Answer 37

We agree.

Question 38

(Paragraph 98: When determining planning applications, local planning authorities should: ● not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and ● approve the application¹⁸ if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should also expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.)

Do you agree that in incorporating the Written Ministerial Statement on wind energy development into paragraph 98 of the National Planning Policy Framework, no transition period should be included?

Answer 38

Should energy supply fall short it may be necessary to review this policy.

Additional Consultation Comment

Planning System

Since the financial crash in 2008, local planning departments have been cut back both in terms of numbers and expertise as planning applications reduced significantly and to save money as local authorities were squeezed. As the economy has improved and construction investment has increased in many areas local authorities have not been able to invest in their planning departments as funds diverted to front line council services. Therefore, our key message is that any significant changes to the planning system including adding stringent measures to local plans, must take into account the financial constraints of planning departments to meet new demands.

Local authorities should be supported to deliver planning legislative requirements and deliver positive planning decisions as quickly as possible which will allow for more homes to be built.

In addition:

- *There should also be simpler rules around key allocated housing sites to speed up planning permissions and housing delivery.*
- *New measures should be explored that will ensure the Section 106 commitments by Developers is delivered within a defined delivery time.*

Local Authority contracting rules / procurement rules

Our recent experience in liaising with local authorities to explore joint venture opportunities has been enlightening. Most authorities are extremely enthusiastic in how low carbon modular housing can deliver their ambitious housing targets as well as create local supply chains. However, we then are thwarted in some cases of taking our proposals further by stringent procurement requirements including satisfying OJEU. Present Framework agreements entered into by local authorities are preventing new Developers getting access to sites without using a Framework Contractor particularly where modular housing is favoured to address local housing need.

Local authority housing procurement can be a complex and timely exercise and may put off developers coming forward. In addition, Framework Contractor agreements can hinder modular housing developers because of their unique contractor and subcontractor requirements. Therefore, we recommend a review of local authority procurement processes and Framework Contract Agreements to ensure they are fit for purpose and do not unnecessarily hinder the delivery of local housing plans and local housing need.

For more information or clarification please contact:

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