



CRISPIN BLUNT MP
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HOUSE OF COMMONS
LONDON SW1A 0AA

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Planning for the Future Consultation
Ministry of Housing, Communities and Local Government
3rd Floor, Fry Building
2 Marsham Street
London SW1P 4DF

Our reference CB/GO

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Dear Sir/Madam,

Response to Consultation on Planning for the Future White Paper

As the MP for Reigate, a constituency that lies entirely within the London Metropolitan Green Belt, please accept this letter as my response to the current consultation on the Planning for the Future White Paper.

Whilst agreeing that changes need to be made to make the planning process simpler and more efficient, I remain extremely concerned about the lack of any stronger measures to protect Green Belt land from erosional development, and am especially concerned about the apparent lack of finesse to be adopted in determining housing numbers imposed on Green Belt local authorities (such as in my constituency).

The paper proposes a new nationally-determined, binding housing requirement that local planning authorities would have to deliver through their Local Plans. This would be focused on areas where affordability pressure is highest to stop land supply being a barrier to enough homes being built.

I note that this requirement 'would factor in land constraints, including the Green Belt,' but clarity is required. The methodology for calculating housing numbers remains opaque.

The current methodology for calculating local housing requirement (The Standard Housing Method or SHM) has imposed excessive demands on Green Belt local authorities and has led to much Green Belt land being released for development in order that target housing numbers can be achieved. This has caused a national trend of Green Belt erosion due to the high value of much Green Belt land, which attracts developers, aware that it may be ultimately forced to be released for development. The resulting developments are normally high value homes which are not in the 'affordable' category.



The focus should be on re-developing Brown Field sites in urban areas and building affordable, but not inappropriately dense high-rise homes in more deprived areas of the country where there is a genuine shortage of housing, to support the economic development of these areas, not to enable high value developments in sought-after affluent areas of Green Belt that is already overdeveloped.

In view of this, the adjustment factor for Green Belt local authorities like Reigate and Banstead needs to be carefully considered and made transparent. My strong suggestion would be to create an additional logarithm that takes the generic, formula driven, housing demand figure and reduces this proportionately based on the area of undeveloped green belt land within each borough/district/planning authority area. This would allow reductions to local new housing requirements in local planning authorities that are currently being forced to allocate Green Belt land for possible future development because there is no other land available to meet existing targets, whilst not affecting the target numbers for areas where there is ample land is available for development.

Other Surrey MPs, including myself, also have deep concerns about the impact that the Standard Housing Method (SHM) is having on our communities, urban and rural, and are disappointed that proposed changes to the SHM will do nothing, overall, to improve the situation. The numbers of houses that we are asked to provide in Surrey using the current SHM already far exceed the county's previous combined local plan requirements. As a result, there is the greatest pressure on our urban areas to accommodate more and more inappropriate developments at too high densities and as a result, our precious Green Belt, Area of Outstanding Natural Beauty and other rural areas are being eroded.

We do welcome the use of the most up-to-date household statistics in the proposed revisions to the SHM. However, the substantial reductions in housing numbers which result from the use of this data in Surrey is just about counteracted by the removal of the affordability cap, for no apparent reason. If this cap was deemed necessary when the SHM was first introduced, why is it now no longer thought to be necessary? Indeed, we would question the rationale behind using an affordability uplift at all as we see no evidence in Surrey that, by building more houses, their prices fall.

The result of both the current and proposed SHMs is that new homes will continue to be delivered in areas that have already seen the highest housing growth in recent years. For example, those local authorities with a significant area of London Metropolitan Green Belt within their boundaries would see a 29% increase in their housing targets under the proposed SHM revisions. These are areas where road infrastructure and public transport is creaking, where school places are under pressure, and where access to GP appointments is proving increasingly difficult. By comparison, housing numbers required for cities and towns in the Northern Powerhouse area would, generally, reduce if the proposed revisions to the SHM are enacted. This would not serve the Government's 'levelling up' agenda.



Furthermore, there is considerable doubt about the construction industry's capacity to build at the rates required to meet current and future targets and the capacity of local planning authorities to adapt to the proposed changes quickly enough.

On a wider note, I would comment that the overall proposals in the White Paper constitute a failed opportunity to move to a plan led not developer led system. The Duchy of Cornwall has been in a position to do this, with huge success, but few other landowners are, or the landowners are the development industry who have land banked.

Yours sincerely,

Crispin Blunt.

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