# DR BEN SPENCER MP RUNNYMEDE AND WEYBRIDGE



Changes to the current planning system consultation
Ministry of Housing, Communities and Local Government
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51 October 2020

## To whom it may concern

I am writing in response to the 'Changes to the Current Planning System' consultation, in my capacity as Member of Parliament for Runnymede and Weybridge. I will also be responding to the 'Planning for the Future' consultation.

The comments below relate to changes to standard methodology and the need to ensure our planning policy delivers outcomes tailored to the needs of local communities. In particular, where development faces significant but very important constraints relating to protection of greenbelt, areas of outstanding natural beauty, and high flooding risk. The availability of truly affordable housing is rightly a priority and a broad range of policy approaches should be taken to deliver this.

#### Changes to the standard methodology

Both Local Authorities within my constituency have expressed concerns over the impact of the proposed changes outlined in this consultation.

There is clearly a need for a national calculation to support our target of building 300,000 homes per year. However, to meet the needs of our diverse communities this should also incorporate the ability to make adjustments to reflect the local environment.

In high demand areas such as those in proximity to major employment areas and/or benefitting from strong transport links, such as Runnymede and Weybridge, the result of these proposed changes would be to significantly increase housing numbers. Yet many smaller urban areas also face limited development opportunities. Under the current proposals there appears no means by which these constraints, such as significant areas of flood plain or Green Belt, could be factored into the assessment of housing numbers. Areas of high risk of flooding and Green Belt are specifically excluded from development in the proposals under the 'planning for the future' white paper.

In areas such as Runnymede and Weybridge this could result in housing targets which are unachievable without significant change to Government policies designed to minimise flooding risks or protect our natural environment. Given the already high flood risk faced by many and the importance of protecting our Green Belt, any such changes would be highly damaging to our local communities.

### **Affordability**

Planning policy has only limited scope to resolve affordability concerns, as solutions must address the issue not just of supply but also demand. Broader Government policy focused on 'levelling up' economic opportunities have a key role to play in addressing affordability. Investing in faster and better infrastructure and encouraging investment across the UK should increase demand outside of the South East and ease demand locally. We undoubtedly need to build more homes; however, we must be able to use a range of interventions to build for future demand as we level up. Planning policy alone is unable to reflect this broader vision and used alone may result in simply increasing the number of high cost housing in existing high-density areas.

This is further supported by evidence that 40% of homes with planning consent since 2011 have not been built. Current planning policy alone cannot address this, therefore we must also look to incentivise local authorities while requiring local developers to deliver approved projects in a timely manner if we are to resolve some of the issues around affordability.

#### Affordable housing

It is right that planning policy ensures the development of affordable housing. In high value areas such as Runnymede and Weybridge, where the median house price is £415,000, 'affordable housing' is out of reach for many. To provide further context, in Runnymede and Weybridge house price to earning ratio stands at of 11.6, compared to a ratio of 8 nationally.

Planning policy must retain the flexibility to reflect local need. Given the extremely high prices (74% above national median house prices), the greatest local need is for affordable and social rent, not First Homes, which due to local high values often cannot deliver genuinely affordable housing. Planning policy should allow local planning authorities to use their knowledge and expertise to negotiate the best options to deliver affordable housing which meets the needs of their local communities.

### Small sites

In areas of significant development constraints, as outlined above, small sites play an important role in the delivery of local housing requirements. Proposals to change the small sites threshold could have a significant impact on the ability to deliver affordable housing in areas such as Runnymede and Weybridge.

#### Permission in Principle for major developments

Major developments, by their very nature, have a significant impact on the local area. The size and scale of a development naturally affects the impact it has upon the surrounding environment, in terms of transport and infrastructure, natural environment, and flooding if



surface water drainage is affected. The potential impact of major developments requires detailed consideration based upon technical information and should therefore not be included in the PiP process.

I look forward to your consideration of these points in the response to the consultation.

Yours sincerely,

Dr Ben Spencer MP Runnymede and Weybridge