



CRANLEIGH PARISH COUNCIL

30 September 2020.

Via email: TechnicalPlanningConsultation@communities.gov.uk

Changes to the Planning Systems Consultation

Thank you for providing the opportunity to comment on the proposed changes to the current planning system.

Cranleigh Parish Council is situated on the south eastern boundary of the borough of Waverley in Surrey. One of the largest village's in England, Cranleigh has a population of approximately 12,000 people. Waverley Borough Council's Local Plan was adopted on 02 February 2018 and allocates 1,700 new homes for the parish of Cranleigh, and another 2,600 homes at Dunsfold Aerodrome in the neighbouring of parish and one of the government's new garden villages. Cranleigh and the very close surrounding villages of Dunsfold, Alfold and Ewhurst has already been allocated over 40% of the total housing allocation for the entire borough concentrated into the eastern villages purely because they are on countryside beyond the green belt.

Introducing a new standard methodology for calculating housing need would increase Waverley's annual allocation for 590 dwellings to 835 dwellings. The new standard methodology is another desktop algorithm for setting targets that are unrealistic and fail to consider the local housing market perspective. This proposal appears to earmark London and the South East as the most concentrated area for growth however it is also one of the most constrained areas with the Metropolitan Green Belt. This puts further enormous pressure on the limited areas of countryside beyond the green belt, like Cranleigh. There is no consideration for the consequences of delivering large numbers of houses in these ever-decreasing concentrated areas. It is clear that these areas continue to be selected not because they are sustainable locations but purely because they do not have the policy constraints of the green belt.

Developers have no incentive to build excessive housing in these areas as their objective is to maintain high housing prices, they therefore trickle feed the housing which does not keep in line with the housing delivery numbers required by the Government and forces planning authorities to grant more planning permissions as a 5-year housing supply becomes impossible to maintain. This proposal does nothing to address this and puts even more pressure on small market towns and villages which do not have the supporting infrastructure and effectively creates unsustainable dormitory towns with a heavy reliance on the private car.

It is also difficult to understand why Waverley's targets are increased by 40% under this proposal but Woking's numbers will be reduced, despite Woking's supporting comprehensive infrastructure, and particularly when Waverley's allocated housing numbers were increased to meet 50% of Woking's unmet need.

With Government committing under the delayed Environment Bill that new English developments will be required to demonstrate a 10% increase in biodiversity on or near development sites this new proposal seems to be completely contrary to that commitment. The natural environment and the climate emergency should be a focal point of this proposal in order to have any chance of meeting the Government's target for net zero by 2050.

Climate change is already having a very real and increasing impact on our parish. We are in an area of water stress and this is becoming more apparent each year when residents have repeated interruptions in water supply, necessitating the reliance on deliveries of bottled water.

The new standard methodology does not take adequate account for the impact on the economy and on our residents from Covid-19 and it would appear that any methodology based on 2018 figures should now be considered fundamentally flawed. In fact, it would seem completely the wrong time to make such radical changes to the planning system when people's minds are focused on the health and well-being of their family and friends and protecting their livelihoods. The future of the economy is at the moment subject to so many variables, including a downward trend of house prices, or even a collapse, which could result in policy which is not fit for purpose and we all remember the ghost estates in Ireland in 2010. We do not support this proposed change.

The First Homes proposal could undermine the delivery of more affordable rented homes, diverting support away from those most in need and exacerbating the housing crisis. Existing shared ownership schemes are also more affordable than First Homes and imposing a 25% level of First Homes on development sites would also negatively impact on their delivery.

There is very little detail within the consultation of how this scheme will work in practice and there is a risk that these homes will be of a lower quality than more expensive market housing. If developers are to fund this scheme *without* additional expenditure and the properties are CIL exempt this appears to put even more pressure on the proposed single national infrastructure payments to deliver all that was funded in the past by S106 and now CIL, schools, health care projects, environmental improvements and road safety measures as well as affordable homes. Although Local authorities have some discretion to increase the discount from 30% to 40% or 50% it is not at all clear how this would be funded. Additionally, we would like details of the mechanism to keep the First Homes affordable after the first purchaser, and thus the affordability be retained in perpetuity on these properties. Whilst we welcome a scheme that provides discounted homes for local people without more detail, we would be unable to support this proposal.

Increasing the small sites threshold from 10 to 40/50 dwellings would detrimentally impact the amount of affordable housing that is delivered. This does not consider boroughs like Waverley that rely on many small sites to deliver new affordable housing. There is a real risk that developers will submit multiple applications under the threshold to avoid the requirement to provide affordable housing. This proposal would reduce the number of affordable homes delivered locally and we could not support it in its present form.

The proposal to remove the restriction in the current Permission in Principle regulations on major development appears in the main to be linked to the initial cost to developers only. Major development has far more impact on an area and far bigger potential profits to the developer, the technical reports required for outline permission on major sites are critical to assess the impact on wildlife, infrastructure, and flooding. These need to be assessed at the very earliest stage. This approach would also limit the ability of local residents to comment on these applications which will have significant effects on their local area. We do not see the benefits of this proposal to our residents and could not support this proposal at this time.

Yours faithfully
CRANLEIGH PARISH COUNCIL

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