

The Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities & Local Government

jenrickr@parliament.uk

TechnicalPlanningConsultation@communities.gov.uk

Sent by email

1 October 2020

Dear Mr Jenrick

RE: Changes to the current planning system

Richmond Council is deeply troubled by the 'Changes to the current planning system' proposals published by the Ministry of Housing, Communities & Local Government on 6 August 2020.

The Council has set out its full response to the consultation in the attached form, but our response is constrained by the technically detailed nature of the questions. In due course, we will submit the Council's full response to the Planning White Paper / Planning for the Future consultation, which proposes a series of fundamental changes to the planning system. In the interim, I would like to set out our concerns.

We recognise the need to address the housing crisis, but the proposed changes are overly focused on housing matters at the expense of other pressing issues such as the climate emergency, sustainable economic growth, and the future of our town centres. None of these are discussed in detail, yet the proposed changes – particularly those set out in the White Paper – will have fundamental impacts on these areas.

Housing affordability has indeed been worsening in many parts of the country, especially in London, but I entirely disagree with your proposed solution that most homes should be built in areas of high demand. This is a very limited economic approach to housing, which overlooks not only the human factor but also environmental and physical constraints. We do need more affordable housing; however, it is already difficult for local authorities to secure affordable housing under the current planning system. Any further changes to, for example, the site size threshold or prioritising non-low cost homeownership options above affordable rent products will only serve to exacerbate the problem. Both the proposed 25% requirement for First Homes and the increase in the site size threshold will fundamentally undermine Richmond's ability to deliver much needed, genuinely affordable and low-cost housing. Much of Richmond's supply comes from small sites, as recognised in our up-to-date Local Plan, which allows affordable homes to be secured from any scheme where there is a net increase in dwellings. Your proposed temporary solution has the potential to wipe out our supply pipeline of affordable homes in an area of high need and shows that a nationalised approach to such policy issues does not work at a local level. Our communities will rightly consider that the government is imposing policy from the centre without regard for our local area or our need to develop policy based on our own challenges and ambitions.

We have a duty to ensure the right type of housing is delivered. The pandemic has very starkly emphasised the contrast between those living in flats with limited access to outside space and those living in more roomy accommodation with gardens and the ability to adapt to home working. Economic recovery is understandably at the forefront of the government's agenda, but profits must

not be the only imperative. If proposed changes to the planning system are driven only by housing numbers, and do not address the significant element of need for low-cost rental housing for the least affluent in our communities, including homeless households, then this will sadly be a missed opportunity.

The proposed Standard Method is fundamentally flawed: it results in a fivefold increase in the housing target not only for Richmond borough but for a significant number of other authorities in London and the South East. Richmond is genuinely committed to housing delivery, with a priority for affordable housing, but it is simply inconceivable to deliver over 2,000 homes per annum here. Past delivery has averaged around 400 homes a year without significantly compromising the many designated assets in the borough, such as the Royal Parks and the Royal Botanic Gardens Kew World Heritage Site. Inflating the need figures will not in itself deliver additional dwellings, but it will result in unrealistic delivery figures and take away the Council's ability to determine applications based on its recently adopted Local Plan. This will ultimately lead to unsustainable development in unsuitable locations. The introduction of a new Standard Method in advance of the development of a methodology giving full consideration to constraints leaves local authorities in a very difficult position – the two should be aligned.

Furthermore, it has been consistently proven that there is already a sufficient supply of planning permissions across the country, with the problem being not the planning system itself but the lack of implementation of the permission and the build-out of schemes. Unfortunately, the published proposals fail to address the issue of land banking or the control that developers exert over the market through low build-out rates, as touched on in the Letwin Review.

In short, the proposed measures would not improve the effectiveness of the existing system but have the opposite effect, as evidenced in our comprehensive response to the specific questions asked in the consultation on 'Changes to the current planning system'. The existing system would be poorer as a result of these proposals – adversely impacting Richmond and its residents.

I ask that further detailed consideration is given to the proposed formula for the Standard Method and request that Government then brings forward a further opportunity for comment through a consultation, which should then inform the Planning White Paper proposals on which this Council will be making comment in due course.

Yours sincerely,



Cllr Julia Neden-Watts
Chair of the Environment, Sustainability, Culture and Sports Committee

cc

Munira Wilson MP; munira.wilson.mp@parliament.uk

Sarah Olney MP; sarah.olney.mp@parliament.uk