



HOUSE OF COMMONS

LONDON SW1A 0AA

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Rt Hon Christopher Pincher MP  
Minister of State for Housing  
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1 October 2020

Dear Secretary of State and Minister of State,

**Changes to the current planning system: Improving the new Standard Method**

1. Further to my recent meetings with you both individually I am writing in response to the Government's "Changes to the current planning system" consultation. Please accept this letter as my formal response to the consultation, which I will be making public.
2. I welcome the Government's manifesto commitment to deliver more homes across the country and it is right that everyone, especially young people and growing families, has an opportunity to own their own home, not just live with their parents or rent indefinitely. They must have the same opportunity to own a home that other generations already enjoy across the Havant Constituency and the country. But this must be done in a way that is both sustainable and deliverable with regard to local conditions.
3. The Local Planning Authority that covers my constituency, Havant Borough Council (HBC), describes itself as a "pro-development local authority" with a pro-growth and pragmatic approach to delivering new homes for our area. The Havant Constituency is popular with young professionals, growing families, and older people moving from other parts of the country to retire or downsize their existing home. HBC are progressing well with their new Local Plan, which has been overwhelmingly approved at Full Council on a cross-party basis, and which they expect to be ready for submission to the Secretary of State early next year. While HBC say in their own response to this consultation that they expect to be able to meet the current annual target for new dwellings set out in their new Local Plan under the original standard housing method, they believe that any significant further increase would be unachievable due to the Havant Constituency being a physically



constrained and already heavily urbanised area with a range of environmentally-sensitive sites within it .

4. As I made clear during my meetings with you both, I share HBC's concerns regarding the first draft of the new standard method for calculating local housing need. I hope that following this consultation and the feedback your Department will receive, improvements can be made to ensure the new system is workable and does not place undue burden on physically- and environmentally-constrained local authorities like HBC.
5. To help achieve that ambition, I am an active founding member of a group of Conservative MPs that has a shared desire to reform and improve the first draft of the new standard method and shape the wider planning reforms. While we represent a diverse range of constituencies across the country, from urban to suburban and rural, we all recognise that there are limitations to the first draft of the new standard method. In particular, there is a concern that, unamended, the first draft of the new standard method could deliver unrealistic new housing targets for local authorities in the South East, while reducing targets for some authorities in the North West and North East. Not only would this disincentivise much-needed housebuilding in these regions but would also prevent the corresponding investment for infrastructure that accompanies new development being delivered there.
6. While I accept that the housing target figures recently quoted in the media and by pressure groups and other organisations are purely speculative given the new standard method is being consulted on and therefore has not been finalised, there has been genuine concern expressed by some residents and community groups in my constituency and by HBC. Therefore, I believe that the finalised new standard method should not be blind to important or unique local factors. Every local authority area has different needs, requirements and constraints. Many of these local authorities from across the country will be raising these factors with you during your consultation phase and I hope that you take these into consideration when you finalise the new standard method. In particular, I believe there are a number of improvements to the first draft of the new standard method that need to be considered and implemented to ensure the new system is appropriate for HBC which I set out below.

### **Retaining the role of local democracy in decision-making**

7. The role of local councillors in the planning decision-making process is of vital importance for the functioning of local democracy. This country has for a long time had a principle that planning decisions should, where possible, be taken by locally-elected councillors. It is vital that through changes to the standard method, councillors retain the ability to decide local housing numbers and development locations through the well-established planning permission process.

### **Calculating Housing Need vs Housing Delivery and Housebuilding**

8. The standard method figure is a calculation of theoretical housing need taking into account technical factors such as affordability and population growth and does not equal the number of houses that are actually built in reality. As HBC make clear in their consultation response, they have granted



1,701 outstanding planning permissions (as at April 2019) which remain unused, which was enough to meet the Council's housebuilding target 3.5 times over. Across the country there are more than one million granted planning permissions that have not been developed and remain unbuilt. This makes it clear that pragmatic, "pro-development" local authorities such as HBC are indeed making the effort to ensure planning permissions are granted. However, this does not always mean houses are then actually built due to various reasons including market forces. Therefore, simply increasing the housing target through a new standard method will not in and of itself produce the dwellings anticipated. Another way of looking at this would be that even if a higher housing need figure were produced under the new and finalised standard method (compared to the proposed HBC Local Plan figure) it would not mean a higher number of houses would actually be built in reality in the Havant Constituency.

### **Protection for environmentally-sensitive areas**

9. The Havant Constituency is fortunate to include a range of environmentally-sensitive sites, listed buildings, registered parks and scheduled monuments. These not only make the area a special place to live, work and visit but they also serve as habitats for birds and animals, or are of special heritage value. These include AONBs, SPAs, SACs, Ramsar sites and SSSIs, which are present across the constituency and limit housebuilding as separate legislation protects them from harm from development. Any changes to the planning system must ensure these special areas are protected, so that they can continued to be enjoyed by future generations.

### **Recognition for areas with physical/geographical constraints such as Hayling Island**

10. Physical and geographical constraints in a local authority area must be taken into account in the new standard method and play a key role in deciding (and lowering) housing need numbers. For example, a physical shortage of land on which to build new houses, which is the case in many parts of the Havant Constituency, should be given weight in the new standard method. In its new Local Plan HBC has brought forward all the realistic housing land within the local authority area. As a constituency that is both highly urbanised in many areas and also home to a range of environmentally-sensitive areas where housebuilding is not possible, there are few further sites that can be identified for new housebuilding. In addition, Hayling Island, one the UK's largest inhabited islands, is a particularly constrained part of my constituency. With only a single road and bridge connecting it to the mainland, the Island is home to a range of environmentally-sensitive sites which constrain the number of new homes that can be built. These features should be taken into consideration, and there should be a mechanism for local authorities to use these mitigating circumstances to reduce the housing need figure required under the new standard method.

### **Duty to co-operate by allowing local councils to share housing need regionally**

11. Directly related to the recognition of the constrained nature of certain local authority areas such as the area covered by HBC, is the essential need to maintain the duty to co-operate or establish a similar new alternative mechanism. Removing the duty to co-operate, or not implementing a similar mechanism, for local authorities to share housing needs across borders, would hinder



sustainable development. For example neighbouring areas such as East Hampshire, Chichester, Fareham, Gosport, Eastleigh, Winchester, Portsmouth and Southampton may contain sufficient locations within their local authority boundaries to permit sustainable development and take housing that cannot be accommodated in the physically-constrained HBC area.

## **Housing Cap**

12. The existing standard method implements a cap on the housing need figure to prevent it from increasing too dramatically. This cap of 40%, if applied to the new standard method, would limit HBC's housing need figure. Removing it completely would, in a physically-constrained constituency such as Havant, leave the local authority in an impossible position in terms of achieving their housing target. Retaining mechanisms such as the duty to co-operate and housing cap would create an opportunity for HBC to meet its housing need target and would mean that market dynamics are recognised in the process. Having a cap on housing need targets is already well established, as it is widely accepted that a sudden increase in the number of new houses on the market risks saturation, which housebuilders would seek to avoid. Therefore, it is important that the housing cap is maintained.

## **Brownfield-first approach to development**

13. Residents across the Havant Constituency value the green spaces that are used for recreation or relaxation, and therefore it is important that any changes to the standard method help to incentivise regeneration and the delivery of new housing on brownfield sites rather than in already-urban areas or environmentally-sensitive or constrained areas. Mixed residential and business developments such as the former Colt site in central Havant and close to Leigh Park is an example of how we can unlock brownfield developments. Rather than asking local authorities to simply increase housing supply by developing high housing-yield greenfield sites, further encouragement and incentives should be introduced to the new standard method to encourage more new housing to be located on brownfield sites.

## **Conclusion**

14. This consultation rightly highlights the need for more housing so more people – especially young people and growing families – can own their own home. This strong desire to achieve home ownership is exhibited by many people that I meet across the Havant Constituency, including in areas such as Havant, Bedhampton, Hayling Island and Emsworth where there are physical and environmental constraints on housebuilding. We must deliver on our manifesto commitment to level-up the country and provide more homes but this should be delivered in a way which takes account of local needs and conditions. As the new standard method is developed and finalised based upon the feedback from this consultation, I hope that you will include vital mitigation measures that would ensure that all local authorities can deliver new homes whilst taking account of local constraints.
15. The first draft of the new standard method is not appropriate for the Havant Constituency, and I strongly recommend that it is amended and improved to take account of the issues I have raised in this submission and during the in-person meetings we have had to date.



16. I would be happy to meet you both again in the future, and HBC's officers have told me they are also willing to meet with relevant officials from your Department to discuss how the new standard method could be developed and finalised to work well for HBC and the Havant Constituency.

Yours sincerely,

*Alan Mak*

**Alan Mak MP**  
**Member of Parliament for the Havant Constituency**