# 

Hampshire MP name & address

25 August 2020

Dear (Hampshire MP name),

We wanted to get in touch early in the current consultations for the Planning White Paper (PWP, deadline 29th October) and the accompanying Changes to the Planning System (C2PS, deadline earlier 1st October), so that we could let you know of our concerns and those of our many members.

CPRE Hampshire was recently party to a meeting with Robert Jenrick MP and he confirmed that he was listening to CPRE’s long experience of planning and our wisdom and views were much appreciated.

There are many aspects of the PWP that we would support. The ambition to bridge the generational divide; the emphasis on strict design codes; the commitment to streamlining the Local Plan process and the determination to involve many more local people and their communities into the Planning process are all welcomed.

However, we also have substantial concerns about the proposals and many of them stem from the consequences of the algorithms used in the various calculations which may be unintended. These algorithms produce a number of distortions which fundamentally undermine the stated intentions of the Government’s proposals.

These proposals would:

1.     **Transfer development from urban to rural areas**

The proposed new standard method (para 30 of the C2PS) would shift housing numbers from the cities to the rural districts. In Hampshire, there would be increases in Winchester by 58%, East Hampshire by 50%, Test Valley by 40%; and decreases in Southampton by 17%, Portsmouth by 14%.

This cannot be consistent with the stated aims of achieving sustainable development and maximising re-use of brownfield land. It also does not account for any constraints in terms of National Parks, other designations, nor water resources, or access to public transport hubs. In Hampshire, these are critical.

**2.**     **Make housing in Hampshire even less affordable**

The algorithm used to calculate the adjustment/affordability factor (para 32 of the C2PS) creates a built-in incentive for developers to continue to build more houses at a price above the median price because this would ensure that the LPA is then required to allocate even more land for even more homes. The effect will be to make the average house even less affordable for the younger generation.

**3.**     **Deprive the most disadvantaged regions of investment**

The algorithm used to calculate the Infrastructure Levy will distort the geographic distribution of the investment. The way it is currently structured, the vast majority of the investment will accrue to the richest areas of the country. The more deprived areas of the country will yet again be disadvantaged.

But the overwhelming flaw that our members see in the proposals is that the changes proposed are not necessary to meet the Government’s stated target.

According to the PWP, the Government is committed to meeting ‘the national housebuilding target of 300,000 new homes annually, and one million homes by the end of the Parliament.’ But this can be achieved without these reforms. **At present, there are one million homes that already have planning permission** that have not been built. In order to meet the target that Government has set and to address, with urgency, the major issue of the generational divide, we believe that the focus of Government action should be to ensure that these existing planning permissions are built out immediately. The low absorption rates identified in the Letwin report should no longer be tolerated.

We would welcome an opportunity to discuss these points further with you. Happy to meet in person or by Zoom or Microsoft Teams if you would like to discuss this further.

Yours sincerely

Dee Haas

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