

By email:

Rt Hon Sajid Javid MP
Secretary of State for Communities and Local
Government
House of Commons
London
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7th November 2017

Dear Mr Javid

Planning for the right homes in the right places: consultation proposals

I am writing on behalf of the Leaders of Surrey local authorities in response to the consultation on '*planning for the right homes in the right places*'. Authorities will be commenting individually on the various proposals in the consultation, but we wanted to emphasise the importance of one of those proposals to us all - the use of a standardised methodology to calculate local housing need.

The current process of calculating objectively assessed housing need leaves substantial room for interpretation. We therefore support the principle of a standardised methodology which would remove dispute over how housing need is calculated and speed up the local plan process. However, the use of the affordability ratio as a modifier is of concern. It is overly simplistic and does not reflect the complex nature of the housing market. We urge the Government to consider other factors that should be taken into account when calculating local housing need. A more nuanced standard methodology would more accurately reflect actual housing need.

As important is the need to take account of constraints on new development. Most of Surrey is heavily constrained by the Green Belt and other important designations. These designations impose severe limitations on our ability to meet local housing need. In the interests of transparency and consistency, it is essential that constraints on development are taken into account when determining the number of homes for which each authority is expected to plan.

We note that the data table accompanying the consultation includes a figure for each local authority area of land that is constrained, but this figure plays no part in the standardised methodology. We believe that the local housing need figure needs to be modified by the constraints in each authority. This would provide a mechanism that recognises the Government's dual goals of meeting housing demand wherever possible, while at the same time protecting the Green Belt and other important constraints, such as Areas of Outstanding Natural Beauty and sites protected under the Birds and Habitats Directives. Recognition of important constraints in setting a housing need figure could replace the arbitrary 40% cap proposed in the consultation, and further speed up the local plan process by removing another area that is often subject to dispute at examination. It should not, however, prevent authorities' local circumstances being taken into account in arriving at a housing target, where those circumstances are robust and justified.

It is vital that there is greater clarity and consistent messages from across Government as to the role of local planning authorities in protecting the Green Belt from development pressures. The standardised methodology has the potential not only to simplify and speed up local plan preparation, but also to address the balance to be struck between meeting housing need, and protecting the Green Belt and other important constraints. We look forward to clear and unambiguous guidance on this issue, which is of particular importance to Surrey.

Yours sincerely



Councillor Moira Gibson
Leader of Surrey Heath Borough Council and
Chairman of the Surrey Leaders' Group