HURSTPIERPOINT & SAYERS COMMON
PARISH COUNCIL

PARISH OFFICE · TRINITY ROAD · HURSTPIERPOINT · HASSOCKS · WEST SUSSEX BN6 9UY
TEL: 01273 833264 · E-MAIL: OFFICE@HURSTPIERPOINT-PC.GOV.UK
WEB SITE: WWW.HURSTPIERPOINT-PC.GOV.UK

Email to: technicalplanningconsultation@communities.gov.uk
Ministry of Housing, Communities and Local Government
3rd Floor, South East Fry Building
2 Marsham Street
LONDON
SW1P 4DF

1 October 2020

Dear Sir/Madam,

Response to Consultation on Changes to the Current Planning System

Deadline for Responses: 23:45 on 1 October 2020

The Parish Council met on 24 September 2020 and considered all the questions and points raised by the Government's consultation on the proposed changes to the current planning system

Please find below our responses to the consultation. We have grouped the questions together under their four main headings and have responded with specific comments rather than attempting to answer each question individually with yes/no answers.

i. **Q1-Q7 – Re: Changes to the Standard Methodology for Assessing Local Housing Need:** There was concern over the proposed algorithm, which both Andrew Griffith MP and West Sussex County Council have talked about publicly. It would not "level-up" the house building in the north with the number in the south of the country and, instead, it would lead to even greater numbers in the south. Locally, more and more homes are being squeezed in between the High Weald AONB and the South Downs National Park (i.e.in the Low Weald) and increasing the pressure on already limited local infrastructure from roads to available water supply. Concern was also raised over the density of new homes being built and lack of garden/amenity space for young children.

   We therefore object to the proposal to change the demand calculation basis. A great deal of time and money was spent arriving at District and Neighbourhood Plan numbers and these should not be swept away by a couple of sentences in a white paper. In addition, the District Plan uplifted numbers do not yet have a delivery plan. Any increase in this so far unmet requirement increases the risk of District losing its claim to have a five-year land supply and the District Plan giving way to a free for all as a result.

   It was agreed that we should stay with the current methodology as the new proposal would not benefit the parish.

Conclusions/Observations:

There should be no change to the use of the Standard Method currently used.
The proposed change will result in a major increase in housing numbers currently projected which would adversely impact upon already severely limited local infrastructure.
The methodology put forward is unproven.

ii. **Q8-Q16 – Re: Securing of First Homes through developer contributions in the short term until the transition to a new system:** Although affordable housing was supported there was concern that with no restrictions on selling on at a profit, any provision should be protected as future affordable housing. An inflation only profit could be proposed, or maybe rented affordable homes is a better solution. The Parish Council does not need to try and find the solution, but we want to stress the need for affordable housing and locking it in for the future, so people cannot profit from it. It was noted that private rents can be more expensive than mortgages.

Conclusions/Observations:

The Parish Council is concerned that this could negatively impact on the delivery of much needed social /affordable housing and selling at a 30% discount, with no restriction on subsequent sales, would lead to early sales to realise quick profits.

iii. **Q17-Q23 – Re: Supporting small and medium-sized builders by temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing:** The Parish Council objects to the reduction in the number of affordable homes to be required to be built by developers. Any development with 11 homes or over should include at least 30% affordable housing. If raised to 40, many larger developers would benefit by using their phase building approach of 30 - 40 houses. Keeping the numbers low (below 11) is more likely to benefit small builders as they are the only ones who would wish to take on a small site of this size. Developers pay a price to the landowner commensurate with the value of the land, which will still be more valuable to the landowner than agricultural or garden use.

Conclusions/Observations:

The raising of the small sites threshold will substantially reduce the number of social/affordable housing and result in a significant increase in the unmet need in the Parish. It will also encourage a phased building approach to circumvent the threshold.

iv. **Q24-Q35 – Re: Extending the current Permission in Principle to major development:** The Parish Council objects to the proposal that the permission in principle be extended to greenfield sites. Members wished to see brownfield sites promoted over greenfield sites. The Parish Council supports the permission in principle to be extended to brownfield sites.

Conclusions/Observations:

The proposals lower the criteria for development and will not require evidence relating to sustainability, viability, and impact on the surrounding settlements. Meaningful local consultation should be retained.

We do hope these observations are helpful in reaching your decisions on any changes to the current planning system.

Yours faithfully,

Sarah Groom

Sarah Groom
Clerk to the Council

c.c. Andrew Griffith MP
c.c. Councillor Joy Dennis, West Sussex County Council