

**Working Group M – ‘Changes to the current planning system’ consultation
24 August 6.30pm**

Present:

Janice Henwood (Chair)
Andrew Barrett Miles
Peter Chapman
Robert Duggan
Robert Eggleston
Lee Gibbs
Simon Hicks
Tofojjul Hussain
Sylvia Neumann

The Working Group discussed the four points listed in the ‘Scope of the Consultation’ of the document, and commented as follows.

1. Changes to the standard method for assessing local housing need:

There was a discussion where the following points were raised:

- Standardising the method is sensible
- The mechanics/algorithm were unclear and dubious
- 140 local authorities would be required to take more housing – would this include Mid Sussex?
- As the A level results situation had showed, algorithms were not always reliable
- Would the Covid-19 situation be taken into account, as this would affect employment and therefore demand for housing
- Gatwick Airport was a huge employer in the area, and source of income, which affected the demand for housing. It would be a long time before Gatwick recovered from the Covid-19 situation, and this impact should be reflected in the methodology.
- The algorithm was based on the status quo/previous history, and did not reflect the current and likely future situation.
- There were concerns that the document stated affordable housing would not be prioritised
- A ‘one-size-fits-all’ approach wouldn’t necessarily match what was being done and what was needed locally.
- There were concerns over the zoning proposal, this could mean for example that one side of the town would get all new housing.
- There was no evidence to a lot of the proposals
- The onus should be on the writers of the paper to provide proof that their solutions would work, rather than on the consultants to prove they wouldn’t.
- Did supply and demand apply to housing? For example landlords with large numbers of properties to let could distort this
- How well does the algorithm work in defining the supply? The evidence should be provided, and the numbers should be illustrated.
- There was not enough information given

- There were an estimated 1/2million housing sites with existing planning permission which had not yet been developed. Areas could be zoned and developers could develop these sites, overlooking their existing sites with permissions
- There was nothing about forcing developers to use the land. If the market was depressed, the developers would not deliver these houses, then the allocations would say not enough houses had been built and would seek more land.
- Each authority needed to know how they would be affected.

The following response would be submitted:

The Town Council had the following general response to the section of the consultation regarding 'Changes to the standard method for assessing local housing need'.

The Town Council felt it was sensible to have a standard method for assessing local housing need, but questioned the methodology.

The proposal only reflects the pre-covid situation, what allowances have been made to reflect the current and future situation with the virus, particularly taking into account the proximity of Gatwick Airport, a large employer in the area which would be affected. There was no onus on the developers to build on the sites they had been granted permission for. A fundamental flaw in the proposal was that this is only about the land supply, not about the developers actually building.

There needs to be a standard we can trust and understand, and that the public will understand. Each local authority needs to know how they will be affected.

The Town Council had several specific questions on this point, regarding questions 1-5 of the consultation document:

- **Do you have geographic data that shows this is a valid solution?**
- **Can you show that, where you have examples of lack of supply and low affordability that this new method adequately improves supply and affordability; can you further demonstrate that in other areas there will not be an oversupply?**
- **Regarding the results of revised standard method, [paragraphs 40, 41, 42], Will these assessments be independently reviewed?**

2. Securing of first homes through developer contributions

There was a discussion where the following points were raised:

- This would have an impact on the provision of affordable/social housing.
- 25% of the developer contributions will go to first homes, which will not be to people on social/affordable housing list. This would have a negative impact on those who are not able to afford housing.

- As of 23 August 2020, on the MSDC list, there were 835 people/family units needing a 1 bedroom property, and 634 needing a 2 bedroom property.
- People in need of affordable housing would not be able to purchase these first homes.
- There was a difference between affordable housing and social housing for a subsidised rent. Focusing on affordable housing bought two risks – focusing on affordable housing to be bought on a mortgage may come at the expense of standards. Affordable housing to be bought on a mortgage had a different benchmark price for the developer to social housing for rent. The developer may be able to avoid social housing for rent development as they would still get a premium on affordable housing to be bought. This would lead to a danger of losing social housing for rent.
- In the district plan there was a minimum of 30% affordable housing for developments. Looking at the waiting list, it was clear that there was a need for more social housing for rent. How would this be differentiated from affordable housing to be bought?
- Looking at social housing compared to affordable housing, the terms were often used interchangeably. Currently social housing at a subsidised rent level and shared ownership properties were conflated together. What was predominantly needed was social housing at a subsidised rent level.
- The requirements for affordable housing was currently locally set, this would be a national 'one-size-fits-all'.

The Town Council had the following general response to the section of the consultation regarding 'Securing of First Homes through Developer Contribution':

This proposal will have a negative effect on and will significantly reduce the social housing provision. 25% of developers provisions will now be going to private housing, and will therefore be lost to social housing provision.

3. Temporarily lifting the small sites threshold.

There was a discussion where the following points were raised:

- Changing the rules on where affordable housing kicks in means that more houses can be built without being required to build affordable housing, this is a backwards step.
- It is possible for a house builder with scope for a larger number of homes to split it up into separate sites to avoid contributions. Precautions against this were proposed in the consultation document, however there is no assurance that this will come forward.
- The threshold should not be raised to 40 or 50, sites of 11 or more houses should be required to have affordable housing.
- Raising the threshold would only make more profit for the developer, there was no benefit for the end buyers/renters
- Any rush to start new developments due to this raising of the threshold would not outweigh the loss of the developer contributions.

- It was written that this would be for a limited time period as the economy recovers from Covid-19, however this statement was not evidenced or guaranteed.

The Town Council had the following general response to the section of the consultation regarding ‘Temporarily lifting the small sites threshold’:

The Town Council do not support any raising of the threshold for provision of affordable housing, given the need in Mid Sussex for affordable/social housing. As of 23 August 2020 there were 1800 people/family units currently on the waiting list for social housing. How is it foreseen that the needs of our community will be met by raising the threshold?

This raising of the threshold conflicts with the second point, on delivering affordable housing, as it will reduce the social housing provision.

There is no evidence provided for this proposal. It is open for abuse by developers. The Committee has no confidence in the approach to control phasing by developers. There is no evidence that this will lead to economic development.

4. Extending the current permission in principle to major development

There was a discussion where the following points were raised:

- Once you have permission in principle, the amount of influence that local councils have on what is then developed is limited. Currently they are not considered in enough detail, this will open the floodgates.
- Saying that transport is not a material consideration could mean you could put a development anywhere without proper transport links.
- The policy abandons any pretence of criteria for development sites, any developer that owns land can bring forward a site with potential for development, and if it is within a development zone then it will be approved without being fully considered. This could lead to sites without proper infrastructure.
- Principle of development only needs to be established once, and an application would only be commented on once, at the first stage, when the least amount of information has been provided.
- Where does the Neighbourhood Plan come into play? This undermines the principle of Neighbourhood Plans, which will not be able to have any impact on housing.
- MSDC will also be consulting on these documents. The town Council would ask to see their response, and would send their response to MSDC.

The Town Council had the following general response to the section of the consultation regarding ‘Extending the current permission in principle to major development’:

Permission In principle for major development lowers the criteria for developments, limits any influence from local Councillors and the public, and

eliminates any local knowledge or experience. It undermines Neighbourhood Plans. It negates the responsibility of the developer to provide evidence of feasibility for any development.

The meeting ended at 19.30