

## Guildford Residents Associations

Response to consultation on ‘Changes to the current planning system’ Sept 2020

*Q1 Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?*

No, we do not agree with the introduction of housing stock into the standard method. The existing housing stock is generally not a good indicator of demand. We do support the use of 10-year average household projections.

We are also concerned about ensuring that housing targets should also take into account the forecasts of households by size. We cannot assume that market forces will take care of matching supply to need, e.g. a higher proportion of one-person households.

*Q2 In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate?*

No. Better not to use existing stock in the baseline calculation. The average net additions to housing stock over recent years can be considered an indicator of local demand, and where this is higher than household projections it could provide an alternative baseline. This approach has been explored by NMSS+Stantec.

*Q3 Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate?*

Yes.

*Q4 Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved?*

Yes, but we think that the proportional change in the affordability index is a more useful measure than the absolute level of affordability, an approach recommended by NMSS+Stantec. We seriously question the statement that ‘the affordability of homes is the best evidence that supply is not keeping up with demand’. The situation is often more complex than this. The market can be influenced by many factors including finance (interest rates), buy to let, second homes, and constraints on land use such as AONB.

*Q5 Do you agree that affordability is given an appropriate weighting within the standard method?*

No. We understand that the baseline total produced by the propose new standard method is 174,000. The total national housing need is quoted in para 40 to be 337,000, which means that the affordability adjustment accounts for 48% of the total. We believe that this makes it not so much an adjustment than an equal partner to the ‘baseline’, and that giving it such significance is unwarranted. The assessment of local need is more complex than is provide for in the proposed new standard method.

*Q8 The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):*

- i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.*
- ii) Negotiation between a local authority and developer.*
- iii) Other (please specify)*

We favour option i) because it is the method in line with intentions expressed in local plans.

*Q14 Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability?*

Yes. However, there should be a defined maximum limit to the proportion of market housing.

*Q15 Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?*

No. The small site threshold is there for good reasons.

*Q16 Do you agree that the First Homes exception sites policy should not apply in designated rural areas?*

Yes.

*Q17 Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?*

No.

*Q22 Do you agree with the Government's proposed approach to setting thresholds in rural areas?*

Yes.

*Q24 Do you agree that the new Permission in Principle should remove the restriction on major development?*

No. This would be a step too far. In the White Paper, the broadening of the scope for Permission in Principle is within the context of the categorisation of land, and the development management policies established at national level, which is not the case currently.

Q25-34

We do not want to see Permission in Principle extended, so these questions have not been addressed.