



# MERROW RESIDENTS' ASSOCIATION

[www.merrowresidents.org.uk](http://www.merrowresidents.org.uk)

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29<sup>th</sup> September 2020

## **Changes to the current planning system** **Consultation on changes to planning policy and regulations**

Herewith comments from the Merrow Residents' Association on some of the questions in the consultation on changes to the current planning system.

Kind regards

Andrew Strawson  
Chairman

<b>Qu. No.</b>	<b>Question</b>	<b>Response</b>
1.	Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is <i>whichever is the higher of</i> the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?	<p>No - as this doesn't allow for differing local circumstances. The policy should be more targeted to build homes in areas where there is both a real need and where there is land available for development without adversely impacting the area and the environment. This could be achieved with a little ingenuity to ensure that development does take place in the most appropriate places.</p> <p>Guildford should not be required to lose even more Green Belt by raising housing targets in this arbitrary manner.</p> <p>There is a real problem with the use of latest household projections as they are notoriously unreliable and vary far too much from period to period. This could be overcome by using the ONS's alternative set of projections which uses a 10-year trend period.</p> <p>We take the view that the number of new homes delivered in recent years is a sensible measure of demand that can be used as an alternative to household projections, where it is higher.</p> <p>We are also concerned about ensuring that housing targets should also consider 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.</p>

4.	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?	<p>No</p> <p>We fail to understand this obsession with affordability when the homes that are supposed to be affordable aren't affordable to the younger generation.</p> <p>The emphasis should be changed to promote the construction of small new start up homes that the younger generation can afford to buy. This won't be popular with developers who seek justification to build larger homes where they can make more profit.</p> <p>We are aware of the Government's ongoing affordable building programme where the emphasis is on new build affordable housing but the bar is too high and although it will assist some through the various elements of the scheme it doesn't cater for those who are on lower incomes or in high cost areas such as the south east of England.</p> <p>Any new scheme should encourage the construction homes that are 2050 compliant- as part of a strategic recovery plan</p>
5.	Do you agree that affordability is given an appropriate weighting within the standard method?	<p>No</p> <p>It appears that the baseline total figure has been inflated very significantly which is not supported in any way by the evidence presented.</p>
8.	<p>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):</p> <p>i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.</p> <p>ii) Negotiation between a local authority and developer.</p> <p>iii) Other (please specify)</p>	<p>See comments for Q4.</p> <p>The whole issue of affordability needs to be reviewed and this question confuses the issue of affordability and First Homes since First Homes need to be actually affordable and they are not- certainly in our area in the south east of England.</p>
15.	Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework?	<p>No since the small size threshold is there for very good reasons</p>
17.	Do you agree with the proposed approach to raise the small sites threshold for a time-limited period?	<p>No.</p> <p>The threshold should not be changed.</p>
20.	Do you agree with linking the time-limited period to economic recovery	<p>No.</p>

	and raising the threshold for an initial period of 18 months?	
24.	Do you agree that the new Permission in Principle should remove the restriction on major development?	No. This should be considered in the context of the White Paper where we have real concerns on the approach being considered.
25.	Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.	See answer to Q24.
26.	Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?	No. See answer to Q24.
27.	Should there be an additional height parameter for Permission in Principle? Please provide comments in support of your views.	No. See answer to Q24.
28.	Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be: i) required to publish a notice in a local newspaper? ii) subject to a general requirement to publicise the application or iii) both? iv) disagree	No. See answer to Q24.