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Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities and Local Government
Ministry for Housing, Communities and Local Government
2 Marsham St
Westminster
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1st October 2020

Dear Robert,

With reference to the first consultation 'Changes to the current planning system' within the 'Planning the Future White Paper' please note my points below.

As the Member of Parliament for the beautiful rural constituency of Stroud, I have received a significant amount of correspondence about the serious issue of planning. I have consulted with constituents, Stroud District Council and my Gloucestershire colleagues to consider how the proposed planning changes will impact our local area.

I believe the planning system needs reform and welcome the government's ambition to achieve bold change. The system currently frustrates constituents and developers alike, with councillors often caught in the middle. Work to ensure there is local involvement, appropriate build design, protect the countryside and provide for first time buyers is so often undermined there is now little confidence in any aspect of the process. New buildings are also failing to adopt the latest green technology and necessary communications technology to make them fit for the future.

I am however concerned that the reforms proposed in this consultation are not satisfactory and in particular, the Standard Method algorithm would have a negative impact on Stroud and Gloucestershire generally.

1. Extensive work has been done to create an updated Local Plan for the Stroud District. The current algorithm proposals disregard what we have learned from months of consultations about what the constituents want and what the area needs. It also makes sense for existing local plans to be allowed to progress to completion before a new system is put in place.
2. The proposed algorithm would lead to the Stroud District needing to increase our local housing plan by 24%. This would not be accepted by constituents who already feel current housing allocation is too high and the proposals would create extensive pressure on our countryside. By comparison, Gloucester, the closest city to Stroud will be required to decrease their housing plans by 13%. The Cotswolds, which neighbours my constituency would be required to increase housing by 148% to meet the proposals plans. It is worth noting that the Cotswold District Council has unanimously voted to reject Government the proposals.
3. It is counter intuitive that urban areas that require more housing are being asked to reduce development and rural areas with the poorest access to key services are being asked to increased housing. Further, the proposals ignore the importance of countryside in the fight against climate change, biodiversity, wildlife and other government commitments, for example to increase tree coverage.

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4. I understand from parliamentary colleagues that the proposals create similar issues around the country. The targets for housing appear to damage both Northern and Southern constituencies. They please nobody and fail to address the need for homes in the North.
5. The Local Government Association said the new Standard Method 'will lead to London and the South seeing a housing boom while swathes of the North will see fewer homes built'. This will compound the historic inequity and imbalance in development and misses an opportunity to address the problems.
6. The Government has stated the AONB will be protected, which is very welcome and important. This leads to question how the Stroud District and the Cotswolds generally would have capacity for such increased housing.
7. I fear the current proposals will pressure local authorities to meet a significantly enhanced housing requirement forced on them by the Standard Method algorithm without taking into account what we need and what makes our area special. The assessment of housing need and capacity should consider local landscapes, environmental designations, conservation, flood plains, the LNP tree strategy, demographic factors and varying components of household projections which can impact the algorithm affordability calculations, infrastructure and services.
8. Earlier this year several areas of my constituency were flooded, including Nailsworth, Longney, Epney and Elmore. I met with constituents who had been affected by the floods. It was devastating that their houses and businesses were damaged. It is highly likely that to meet the proposed algorithm's housing requirement, properties would need to be built on flood plains. This is unacceptable and unnecessary.
9. The intention of the new affordability adjustment is to identify undersupply where high house prices signify an imbalance between supply and demand. It is also to put more pressure on authorities which have seen worsening affordability over a 10 year timeframe. However, I am not convinced the proposals will have the desired impact on property affordability or the supply of homes for those in a housing crisis.
10. Nearly half of all planning permissions granted remain unbuilt. There are currently up to 1million permissions awaiting completion. With this in mind, I believe a liberalisation of permissions does not guarantee supply. I am not satisfied that this issue is sufficiently addressed. We need to incentivise building out, end disincentives and not reward failing to build.

I hope the above points give you some insight into my concerns about why the current proposals are not suitable for Stroud as drafted. I reserve the right to provide more information about concerns regarding the planning proposals.

Yours ever,

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