



## **Changes to the Current Planning System**

While I have long argued that our planning system is broken (and am therefore very pleased indeed to see the Government's recognition that it needs significant reform), I am writing to outline my concerns (and the concerns of many within my constituency and elsewhere across the country) with regards to the reforms proposed in the Government's 'Changes to the Current Planning System'.

The Public rightly expect planning to be just that: the co-ordination of the location, layout, design, mix – and associated physical and public service infrastructure – of housing and commercial development.

There is widespread public anger about the lack of real local planning in recent years and the move to a system in which local council control and discretion is reduced, infrastructure funding is cut, and large scale out-of-town volume housebuilders are able to make billions from lazily dumping large scale commuter housing on the outskirts of villages and towns with wholly insufficient infrastructure.

Whilst these reforms contain \*some\* good measures – especially on design codes and trees – the disproportionate concentration of massive numbers of houses in rural areas, on greenfield farmland, AND the removal of the local infrastructure levy, is a recipe for infrastructure chaos.

These reforms, I believe, serve to strengthen the hand of those aggressive development companies and fail to address the fundamental issues that the current planning system perpetuates, and which have been/continue to be the basis on which I, and so many others, have called for proper reform.

Left unchecked, these proposals will worsen the situation and, despite some minor positives, add a plethora of new problems to our planning system – at the great detriment of communities across the country, as well as the Government and Party politically on an enormous scale.

Here I shall set out the reasons why I have reached these conclusions.

### **1. The reforms target significantly, and disproportionately, rural areas**

The proposed new algorithm will result in some of England's most rural districts seeing an average of 59% increase in their housing need calculation – compared to a much more modest average of 20% in our major urban areas.

In my own largely rural constituency of Mid Norfolk, it is in fact even worse for the two districts: Breckland and South Norfolk.

As Lichfield have calculated, under the current Standard Method, Breckland is required to deliver 661 new homes (and has delivered, on average over the last three years, 692 homes a year – some 80 homes more than the current Local Plan requirement). The new Standard Method would increase the number of homes Breckland must deliver to 1,070 – which equates to a **c.62% rise**.

Under the current Standard Method, South Norfolk is required to deliver 893 properties a year (and has delivered, on average over the last three years, 1,164 a year – some 301 homes more than the current Local Plan requirement). The new Standard Method would increase the number of homes South Norfolk must deliver to 1,832 – which equates to a **c.105% increase**. (Although South Norfolk is considered part of the Greater Norwich development area, this represents a startling figure).

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8 Damgate Street, Wymondham, NR18 0BQ



Having spoken to district councillors, officials, parish councillors, residents and business groups (not to mention planning experts and colleagues across the House), I am struck by the level of shock and concern about the impact that the new algorithm will have on rural districts across England.

Rather than tackling the issues that have seen the planning system used by aggressive developers to lay siege to rural land that they would otherwise not have had any chance of developing, these hugely increased figures will give them renewed strength and pave the way for development that fails to actually address the national crisis we face.

While targets might be met, the proposals will not encourage the proper planning development this country so desperately needs – instead incubating a whole host of social and economic problems for the not so distant future.

## **2. A liberalisation of permissions does not guarantee supply**

Despite 80 per cent of residential applications being granted, between 2010 and 2017 nearly half of all permissions remained unbuilt. There are currently up to 1m permissions not yet completed. This is outrageous.

Not only does the evidence suggest that the increase in permissions has *not* led to a corresponding increase in starts, I know first-hand from conversations with the leadership and officials at Breckland and South Norfolk in my constituency that this is indeed the case.

As I and many across the House have been arguing for years, we **need to incentivize building out**, ending disincentives, **not reward developers for their behaviour**. This should be combined with other strategies including compulsory purchase of empty homes, and brownfield development priority.

The new proposals completely fail to address this problem.

## **3. The new Standard Method perpetuates historic inequity and imbalance in development and misses a historic opportunity to change it.**

The new Standard Method does not take local policy objectives, supply constraints, or environmental impact into account. It pressures authorities to meet the calculated housing need forced on them by the Standard Method algorithm, but does not look at factors that might constrain the ability to deliver those targets.

Indeed, over my decade as the MP for Mid Norfolk, I have seen how such factors have at times, and in different ways, constrained Breckland, South Norfolk and countless other districts as they sought to deliver housing in their communities. A failure to recognise this will seriously undermine any reforms to the planning system.

The new proposals should consider additional and constraining factors, including:

- National landscapes and environmental designations; support for landscape conservation
- Land constraints, such as floodplain
- The democratic mandate to prevent urban sprawl and greenfield development, or to change approach to housebuilding
- Demographic factors and varying components of household projections, which can skew the circular algorithm, and result in flawed affordability calculations
- Unsustainable pressure on infrastructure and services

Planning authorities facing these constraints need sensitive local assessments and more flexibility to change their method of assessing housing need.

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8 Damgate Street, Wymondham, NR18 0BQ



**4. As a result of these failings, the new Standard Method exacerbates infrastructure and environmental pressures in both rural and urban constituencies**

The targets outside of London see many of the most acute step-changes in housebuilding in areas constrained by environmental designations. Those land-constrained authorities may be forced to pave the way to car-dependent housing estates, away from jobs and services, as the only means of meeting their target.

In Norfolk (and particularly in Breckland and South Norfolk), we are increasingly seeing huge housing estates dumped on communities without the necessary jobs and services to support them. Rapidly, public anger is rising – with existing residents upset at seeing their rural town or village transformed into a commuter/dormitory settlement with little community spirit and unable to cope with the influx of new residents, while new residents find they have spent hundreds of thousands of pounds on a property somewhere unable to properly support them. The social impacts of this will be far-reaching – and neither forgiven nor forgotten.

In London, the targets add a whole new degree of extraordinary pressure which would see the equivalent of several new towns built in urban central/West London and suburban outer London. When considered overall, the ten biggest absolute increases in housing need in England, as compared to current local plan targets, are Tower Hamlets, Westminster, Barnet, Camden, Hackney, Greenwich, Lewisham, Newham, Southwark and Kensington and Chelsea. Several analyses find that the new targets in London are not realistic.

At the same time, Northern towns and cities are rightly demanding attention and investment to regenerate large-scale urban, brownfield sites. The clear danger is that, despite Government reassurances, infrastructure money will continue to flow to the shires and the South to support housebuilding there, rather than deliver much-needed regeneration to the North.

**5. Nationally, the affordability adjustment is considered to have little to no impact on affordability or supply of homes for those in a housing crisis. Again, this effects both rural and urban constituencies.**

The new Standard Method inflates the baseline housing need in areas with worsening affordability, with no moderation for delivery constraints. However, recent increases in housebuilding have had “little discernible impact on prices.” It is far from evident that simply increasing the housebuilding target, and thus supply, will result in a meaningful increase in affordability, or the *types* of houses needed most. **This applies to all areas and all constituencies to varying degrees.**

Indeed, in areas like Norfolk, two of the key problems is the amount of affordable housing and the lack of the *types* of houses most needed. As a result, we are increasingly seeing our young, and families that have lived in the area for generations, forced to move away because they can neither afford the housing in the area nor find the *types* of houses they need. The social and demographic challenges this is creating are profound. We cannot afford for rural regions like Norfolk to become giant ‘retirement homes’.

**6. The targets for housing need undermine the ‘levelling up’ agenda across England, damaging both Northern and Southern constituencies.**

Despite some improvements in the North as a whole, the proposed new algorithm concentrates the biggest falls in requirements in the urban North and Midlands – the very areas we pledged as a Party to ‘level up’ (an agenda which I, myself, am hugely supportive of and a passionate advocate for).

By comparison, the algorithm puts many of the biggest increases in requirements in London and the South. 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” according to the Local Government Association (LGA).

**Constituency Office**  
8 Damgate Street, Wymondham, NR18 0BQ



**George Freeman MP**  
Member of Parliament for Mid Norfolk  
House of Commons, London SW1A 0AA  
Tel: 01953 600617

Manchester, Liverpool and Newcastle upon Tyne districts, for example, have declined in population by 22.9%, 36.8% and 15.8% respectively since 1961. Their new housing need targets (by local planning authority) are not just lower than those produced by the *Standard Method*, but 30%, 48% and 56% lower respectively than the *2018/19 delivery rate* in each authority.

If 'levelling up' means anything, it means an integrated Government plan to support infrastructure, job creation and housebuilding to revive the Midlands and North, especially towns overlooked in recent decades, and to stop the endless drift of jobs and people to the shires and to the South and South East specifically.

### **Conclusion**

While the desire to reform a long broken planning system is welcomed by myself, the proposals here fail to properly address the fundamental issues at hand – and in fact serve to exacerbate the current situation and existing frustrations by creating additional problems.

I would like to request that the proposals are paused, reconsidered (in consultation with MPs and others) and amended before they are taken any further.

**George Freeman MP**  
**Member of Parliament for Mid Norfolk**

**Constituency Office**  
8 Damgate Street, Wymondham, NR18 0BQ