

The Rt Hon Robert Jenrick MP  
Secretary of State for the Ministry of Housing, Communities and Local Government  
2 Marsham Street  
London  
SW1P 4DF

28 July 2020

Dear Mr Jenrick,

### **North East Surrey Authorities – Local Plan preparation**

We are writing collectively as the administrations of Elmbridge Borough Council and Mole Valley District Council to raise our serious concerns about the calculation and underlying data used for assessing the requirements for new homes. We are aware that Epsom and Ewell have also written to you separately on the same subject and Elmbridge have recently written to your colleagues, Mr Rabb and Mr Spencer.

We appreciate that the Government provides the Standard Methodology for housing as a starting point for plan making. We are aware that whilst it is possible to use a different approach to setting out housing need this would be tested very aggressively by Planning Inspectors and as such presents a significant risk to Plan making. The current all or nothing process of examination makes such a risk untenable for most local authorities.

In terms of the application of the Standard Methodology we were very aware of the government's position not to take account of the 2016 housing projections and, whilst disagreeing with the decision and the reasoning, plan making continued in accordance with the national advice. However, we now have the 2018 projections and these confirm the 2016 position was not a blip or anomaly but rather a very strong indicator.

It is absolutely crucial in plan making to ensure that residents understand the reasoning behind decisions that are made, particularly when often those decisions will affect where they live for decades to come. It must also be a prerequisite of proper planning to ensure that we plan for genuine needs and react accordingly. It is therefore an untenable position to move forward with housing needs figures that have no basis in reality and feel based in a formulaic approach rather than proper planning.

It is a fundamental principle of town planning that it seeks to forecast demands and meet them whilst simultaneously shaping places, building communities and garnering community acceptance. It is simply unacceptable to expect constituents to accept levels of housing that bear no relationship with housing need. We have collective concern that any attempt to manipulate the Standard Methodology to maintain alignment with previous government commitments on house building without properly taking account of the housing need projections will be met with derision by Councils and anger by residents. The failure to properly address this issue in 2016 now means that draft Local Plans such as ours will appear predicated on a lie. Acuteness of housing need is a strong factor driving green belt authorities to move their green belt boundaries. It would be exceptionally damaging to do so on the basis of flawed mathematics and we fear this unnecessary destruction of the Green Belt based on unjustified evidence will begin to resonate with residents.

We also fear a breakdown of the Duty to Cooperate. It will be impossible to cooperate on the delivery of housing over wider areas where there is evidence that the need for housing is unjustified. We will end up with a disconnect between the mathematical equivalence of housing need and actual infrastructure requirements. How will it be possible to plan for school places when the numbers of houses significantly exceed the need? The same applies to primary care and many other fundamental forms of infrastructure. How will it impact on the funding streams for infrastructure if we plan for numbers of houses that are not needed? The income from CIL and Section 106 Agreements will not come on stream as thought if delivery of housing slows to meet the actual need, leaving many projects underfunded and promises to residents being broken. It would all reflect very poorly on Local Government and the Planning system.

The government has spoken often recently about 'levelling up' and yet it would appear that this approach to housing will continue to 'overheat' the southeast with an unjustified growth strategy, presumable to the detriment of other areas.

Our officers are rightly advising us on the practical issues we will face depending on the government's reaction to the 2016 and 2018 housing projections. The impact on plan making would seem to be stark. Those figures cannot be put back in the box. They raise serious questions about the levels of development we have been planning for and the knock on consequences. The experiment of a standard methodology where the output adds up to 300,000 dwellings has failed and it needs replacing with something fit for purpose, that makes sense to residents, remains stable and is based in reality.

We cannot impress upon you enough the negative impact failure to recognise that many authorities now have actual housing need that is half what the standard methodology states. This will be easy for residents to understand and cannot be defended. Whether any authorities will try to justify this more accurate figure through their plans remains to be seen but it should not be for cash strapped local authorities to 'test' the system with residents' money on the chance that an Inspector may side with reality rather than government guidance.

We look forward to your reply. We urge that your reply gives a commitment that housing need requirements will now reflect the projections provided to the government by using the 2016 and 2018 figures. Failing that we ask that guidance is provided for local councils that find themselves explaining why a flawed approach is being perpetuated placing them in an invidious position with the electorate.

Yours sincerely



Cllr Margaret Cooksey  
Cabinet Member for Planning  
Mole Valley District Council