

West Hill Parish Council
Gorsecroft, West Hill Road

West Hill

Ottery St Mary

EX11 1TU

Simon Jupp MP House of Commons London SW1A 0AA

7th October 2020

Dear Mr Jupp

White Paper: Planning for the Future

West Hill Parish Council (WHPC) has serious concerns about the implication of the Government's White Paper "Planning for the Future" – not only for our village but also the whole of East Devon.

Throughout the White Paper, democratic accountability is reduced. There will be centrally set housing numbers, national design guides and codes and standardised development management policies. Powers will be taken away from local authorities where local information and consultation with the public could have a real influence. The ability for local people to comment on planning applications will also be severely curtailed.

Is this the end of localism? Only 10 years ago, Eric Pickles said "Communities will no longer have to endure the previous government's failed Soviet tractor style top-down planning targets - they were a terrible, expensive, time-consuming way to impose house building and worst of all threatened the destruction of the green belt." The current proposals would see a return to a system that has already failed.

There is emphasis on the need for more housing nationally. But the White Paper has the wrong answers to the wrong questions. The current planning system has consistently delivered more planning approvals than the building industry can build. The answer is not to demand more planning approvals, but to increase build-out rates for those sites already with planning approval. The Government's own Letwin Review suggests some answers, which include giving more powers to local authorities. The White Paper is taking the opposite approach and centralising decision-making.

Standard Method for Assessing Housing Need

The algorithm used in the standard method is deeply flawed:

- It takes no account of local factors and local need, best assessed by the local planning authority.
- It is based on ONS household projections. These are just projections, not forecasts, and reflect recent growth patterns. In East Devon there has been



significant housebuilding over recent years – this feeds into the ONS projections and creates an artificially high housing number.

- Affordability is the other main indicator in the standard method. But the supply and demand principle does not work for the supply of housing. If builders / developers build more houses than they can sell, they do not reduce their prices, they simply stop building more until the market catches up. So building more houses does not improve affordability. This has been borne out by local experience a slight improvement in the house price/income ratio has been achieved, but because of the creation of more higher paid jobs, not by the price of housing coming down.
- The proposed method produces a completely unreasonable housing number for East Devon. Under current methodology, 918 houses/year are required already a high number which is difficult to achieve. The new method increase this to 1614/year, a 76% increase.
- Most of our surrounding planning authorities have similarly high increases. This
 wide scale growth should only follow a proper national or regional strategy which
 has been properly planned, based on a full assessment, considering economic
 factors, infrastructure, environment and social factors, not just the application of a
 national formula.
- Looking at the implications of the proposed method for housing in the whole country, many planning authorities in the south, including rural areas such as East Devon, are facing huge increases, but large cities in the Northern Powerhouse areas see a decrease in housing requirement. This is completely illogical and contrary to what the Government has said they want to achieve.
- It is difficult to see how such a large increase in housing in East Devon could be achieved. Two-thirds of the district is covered by AONBs, a World Heritage Site coastline, and important designated wildlife sites and heritage importance. There are also significant constraints from limited infrastructure, particularly transport links, schools and health services.
- It is also difficult to see how so many houses could actually be built. Apart from the
 issue of finding suitable land, there is no evidence that house builders would wish
 to build so many houses, and no evidence that there are enough people who would
 wish to buy or rent them.

Neighbourhood Planning

Many people have got involved in neighbourhood plans (including Ottery St Mary and West Hill) since they were created. It is not clear from the White Paper how they fit into the new system. There is a real risk that the current effort devoted to neighbourhood plans could be bypassed and it is vital that the government makes clear what the future scope and power of neighbourhood plans is going to be.

East Devon District Council has produced a robust criticism of the White Paper in its consultation response. WHPC agrees with their comments and fully supports them. If the



White Paper proposals are implemented, there would be devastating consequences for our beautiful District, and the Government will not be forgiven.

WHPC therefore asks you to work with other MPs locally and elsewhere in the country to ensure that these damaging proposals are not implemented.

WHPC will publish this letter on our website and Facebook Page, and will also publish your reply so that our residents can be fully informed of your views.

Yours sincerely

Cllr Margaret Hall

Chairman, West Hill Parish Council

West Hill Parish Council

Tel 01404 232 100

Email clerk@westhillparishcouncil.gov.uk