



Rt Hon Robert Jenrick MP
Secretary of State for Housing, Communities and
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Dear Secretary of State

Re: 'Changes to the current planning system' consultation

Kent has long supported the Government's growth ambitions, consistently delivering more new homes than its counterparts across the entire south east region. Kent County Council, alongside its district partners, is also in well-established discussions with your officials regarding an 'Infrastructure First' proposition. This builds upon the pioneering Kent and Medway Growth and Infrastructure Framework and aims to accelerate planned levels of growth, in return for the upfront investment in necessary infrastructure to support high quality development.

We must now write to express the County Council's strongest concerns regarding the proposals outlined in the above consultation and, in particular, the changes put forward to the standard method for assessing housing numbers. These proposals would be severely detrimental to Kent's commitment to deliver a genuine infrastructure led approach to new housing and economic growth for the benefit of residents, communities and businesses across the county.

We do recognise the Government's manifesto commitment to deliver nationally 300,000 new homes per year. However, we have significant concerns about the proposed approach set out in the consultation and its implications for Kent. It will only serve to compound a series of severe pressures experienced in areas across the county on all forms of infrastructure, and on our cherished natural and historic environments. For the purposes of this letter, we set out our principal concerns and officers have responded to the technical consultation.

Firstly, local planning authorities across the county have already been tasked with the enormous challenge to meet the substantial increases in housing need derived from the initial introduction of the standard method in 2018. The latest proposal would result in yet another step change, far beyond housing targets in adopted Local Plans - even the most conservative figures highlight an overall increase of over 30%. The figures for individual authorities are even more stark; 115% in Dover, 86% in Dartford and 71% in Tonbridge and Malling. Given the genuine planning constraints which do exist in various parts of the county, coupled with the capacity of the market, these figures are simply not deliverable.

Secondly, the nature of the formula applied - which starts to look like a second “mutant algorithm”, to apply the Prime Minister’s phrase - effectively penalises the majority of areas across the county which have already delivered significant amounts of growth. This is partly the result of the longstanding use of the household projections which simply extrapolate past trends, the proposed changes to the adjustment for market signals and the removal of the 40% cap applied in the previous standard method. The cumulative impact of the proposed changes will dramatically increase levels of housing need to the most alarming, unsustainable levels, and reap further misery on residents, communities and businesses in Kent who are simply not experiencing the benefits of growth.

Thirdly, the inherent failings in the proposed approach lead to the starkest variations in the levels of housing need, and completely undermine the Government’s wider policy objectives. The proposals assume that “levelling up” will fail across many parts of the country. For the North East, the North West and Yorkshire and the Humber, housing need actually remains below recent rates of housing delivery in those regions. This is in sharp contrast to the South East and other areas around London, reflecting the significance of the weighting given to affordability.

And finally, we do accept that the planning system has its limitations. However, it is a sector that is completely exhausted by consultation and fatigued by change. Local planning authorities in Kent require certainty and confidence to make plans in response to genuine local needs if areas across the county are to really flourish. It is not at all clear where this latest set of proposed changes will leave authorities who are already in the process of reviewing or updating their Local Plans, and this is in the backdrop of the proposals outlined in the Housing White Paper to introduce a new approach to setting housing requirements. We have every intention of writing separately to you on the White Paper proposals in due course.

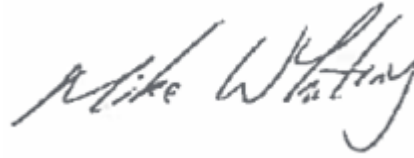
We are fully aware of the Government’s commitments on housing delivery but we strongly urge you to abandon this latest set of changes to the planning system and meet with us to discuss alternatives which are proportionate, realistic and strive to improve the quality of life for people and communities across Kent.

We look forward to hearing from you at your earliest convenience.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Roger Gough'.

Roger Gough
Leader of Kent County Council

A handwritten signature in black ink, appearing to read 'Mike Whiting'.

Mike Whiting
Cabinet Member for Economic Development