

Thakeham Parish Council

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Mssrs Andrew Griffith MP and Jeremy Quin MP
House of Commons
London,
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c/o andrew.griffith.mp@parliament.uk / jeremy.quin.mp@parliament.uk

01 April 2020

Dear Andrew and Jeremy

Housing number targets

When drafting our response to Horsham District Council's Local Plan consultation it was clear to us that plans in the South-East are distorted by unrealistically high central Government housing targets. Unless there is a serious policy rethink, this will result, in the medium term, in a series of damaging, and indefensible, unintended consequences. Only you locally as Thakeham's and Horsham's MPs have the ability to influence Government.

We agree with the need for strong and consistent policies to grow the UK housing supply, in a measured well-planned way. However, we question the relationship between the current specific district-level housing targets and the evidence-base for future economic growth and demographic movements. These targets go beyond what is required to address suppressed demand within the South-East, and assume major population migration into mainly rural counties like West Sussex, attracted by continuous strong economic growth. Those assumptions fly in the face of current evidence and also conflict with other stated policies of this Government.

No recent mainstream economic forecasts relating to the post-Brexit scenario support the growth projections for the South-East that underpin the current housing targets. The additional economic damage of Covid-19, which may have long-term as well as short-term impacts, now renders the assumptions underlying current targets redundant.

Ongoing economic migration into rural south-eastern counties runs counter to the Government's stated manifesto commitment to levelling-up the prosperity of the north of England. There is no prospect of sufficient overall growth to deliver *both things*.

Continuing to impose these housing targets on district-level plans will result in most districts being set up to fail on delivery – and particularly so for Horsham District, as it is also under pressure to take large numbers of new houses from neighbouring districts under 'duty to cooperate' rules. In adverse economic conditions developers will be slow to build the types of housing that communities want, in the right locations. Local authorities, in the main, do not build houses. Individual developers will wait until the district housing supply plans are deemed to have failed and target ad hoc speculative schemes geared to suit their own financial return.

This will be a disaster politically as well as in planning terms. Residents of West Sussex will watch the character of the district being badly damaged by speculative, adversarial development. With district plans set aside, the wrong houses will be built in the wrong places. Other new houses will stand empty, as buyers will be scarce in a context of economic recovery and low inward migration. The county will gain no compensating economic, infrastructure or social benefits. The neighbourhood planning process and constructive local engagement with planning in general will wither for lack of trust.

As Heathrow Runway 3 has shown, the current aggressive housing number targets are vulnerable to legal challenge on the grounds that they are incompatible with UK legal obligations relating to carbon emissions reductions under the 2015 Paris Agreement. There is no meaningful analysis or macro-level planning to offset the carbon impact of the huge volume of housing planned. (Just 'mitigating' this emissions impact will not be legally adequate.) Successful legal challenges are therefore likely and will add to a chaotic planning situation.

In short, sticking with current central government housing targets has become untenable. Please use your influence within the Government to get agreement that the assumptions and models underlying these targets should be thoroughly reviewed and new targets issued, as Horsham District Council has requested. The current Covid-19 situation provides ample reason to halt all new plan development while this work is done. Current plans could be extended by using current numbers targets for another year.

We hope this request is received in the constructive spirit intended. A full version of our HDC Local Plan consultation response is attached, for information.

Yours sincerely

Caroline Instance

Caroline Instance
Chair of Thakeham Parish Council

cc. Chanctonbury area District Councillors: Mssrs John Blackall, Philip Circus, Jack Saheid
Chief Executive, Horsham District Council, Mr Glen Chipp

Attached: full Thakeham Parish Council response to HDC Local Plan Regulation 18 consultation